City of Evanston
PY2019 CARES Act
Action Plan
Second Substantial Amendment
to include the second allocation of ESG-CV funding
Approved by City Council on July 13, 2020

Amended sections:

The second allocation of ESG-CV funding in the amount of $419,890 was included, increasing total ESG-CV resources to $966,314, in the following charts:

AP-15—Expected Resources to Source of Funds, Other ESG-CV

AP-20—Annual Goals and Objectives to Goal 7, COVID-19 Emergency/Urgent Needs

AP-38—Project Summary to Project 13, ESG20 - Evanston
Amended to add the second allocation of ESG-CV CARES Act funding to the PY 2019 Annual Action Plan.

Executive Summary

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

1. Introduction

Evanston’s 2019 Action Plan implements the fifth 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

The 2019 Action Plan was updated to include actual grant amounts ($1,803,432 for CDBG, $355,216 for HOME and $151,731 for ESG) received on April 12, 2019. The City developed its draft Action Plan based on estimated grant amounts and follows its Citizen Participation Plan for the 30-day public comment period prior to January 1, 2019 to fulfill the requirements to be able to charge pre-award costs to our federal grants.

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 2019 CDBG grant amount, which was larger than estimated, staff developed recommendations for the Housing and Community Development Act Committee’s consideration at its meeting on April 23, 2019. The recommendations followed the process described in the draft 2019 Action Plan (included as additional text below). Staff recommendations included increases to three public services recipients: Connections for the Homeless/Drop In Program, Youth Job Center/Youth Employment Program, and YWCA Evanston/North Shore, following the committee’s statement at the October 9, 2018 allocation meeting. Increases were also recommended to Administration, Code Enforcement, and Public Facilities & Infrastructure projects. The recommendations were approved as proposed.
The CDBG, HOME and ESG funding increases did not constitute a substantial amendment because no goal was increased or decreased by more than 20%, so a second 30-day public comment period was not needed.

The amended Action Plan was approved by City Council on May 13, 2019. No public comment was received therefore there were no comments or views that were not accepted.

**Draft Action Plan Funding Process**

The draft 2019 Action Plan was developed using estimated amounts ($1.650 million for CDBG, $280,000 for HOME and $140,000 for ESG) as the timing of the 2019 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 January 1, 2019 to fulfill the requirements to be able to charge pre-award costs to our federal grants. The plan will be updated to include 2019 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 2019 CDBG grant amount, staff will develop recommendations for the Housing and Community Development Act Committee’s consideration to either increase or decrease funding allocations to specific activities. If the actual grant amount is larger than estimated, funding would not increase for all activities on a pro rata basis. 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 would affect the viability of the program or project. The Housing and Community Development Act Committee noted that if the City’s 2019 CDBG grant resulted in substantial additional funding than estimated, the YWCA, Connections for the Homeless and the Youth Job Center programs would be considered for additional funding, as they were funded significantly below their request and below 2018 levels. If the actual CDBG grant amount is less than the estimate, reductions to activity funding would be considered on a case-by-case basis, taking into account the same factors.

HOME and ESG funding is not allocated to specific activities until the City receives its grant amounts; changes to those amounts would not constitute a substantial amendment unless the amounts were to be so substantial that funding for any goal were increased or decreased by more than 20%.

In the event any adjustment to the draft Action Plan 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 2019 that change funding for a goal by less than 20% shall be considered “non-substantial” and 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: This continues to be the City’s highest priority. Maintaining and increasing the supply of affordable rental units is increasingly difficult due to reductions in funding and increases in the cost of real property. Increased construction costs impact capacity to preserve affordable housing. Housing Rehab and Public Works will partner on a pilot program in 2019 to address lead hazards by replacing the homeowner portion of lead water service lines for income eligible homeowners in areas where the City is upgrading the water mains and replacing the City’s portion of the lead water service lines in the public right of way. Code enforcement in the CDBG Target Area remains an important tool to maintain decent, safe housing and address blight. Properties cited for violations are referred to the Housing Rehab program for assistance; the City continues to pursue demolition of vacant and blighted properties. Demolition is managed by the Housing Rehab staff with demolition costs funded with Abandoned Property grant funds from IHDA when possible. Cook County Torrens Lead funding is layered with CDBG on eligible housing rehab projects as additional leverage.

Homelessness: The City will use HOME funding for its Tenant-Based Rental Assistance (TBRA) program. 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 funding to improve public infrastructure and facilities to revitalize neighborhoods and improve service delivery. 2019 funding has been allocated for: installing drainage and paving an unimproved alley in a primarily low- and moderate-income neighborhood; new perimeter fencing to improve safety for children in a park; and for two projects that
will improve the facilities of non-profits serving primarily low- and moderate income residents. In addition, several Public Facilities projects funded in prior years are expected to be completed in 2019.

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 using CDBG funding allocated in prior years 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 availability of needed services including, but are not limited to, mental health, dependent care and youth programs, and job training is a goal. Reductions in State of Illinois funding, particularly for child care, the homeless, the disabled, mental health and substance abuse programs, has impacted non-profits’ service capacity and expanded unmet needs; lack of state funds and delayed payments on contracts continue to threaten the stability of numerous agencies. Additionally, the City is grappling with a budget deficit for 2019. The proposed 2019 budget includes a reduction in City grant funds for social services organizations of $250,000 to $486,300; if approved, this would amount to a reduction of about one third from 2018.

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 needs and leverage outside resources to achieve goals. In 2018, a two-unit affordable acquisition and rehab project funded with HOME and local Affordable Housing Funds (AHF) was completed and rented by Community Partners for Affordable Housing (CPAH). The HOME funded unit was rented to a household with a total income at or below 60% AMI and the unit funded with AHF dollars was rented to a household with a total income at or below 80% AMI in order to generate cash flow needed for rising property taxes and other expenses.

The Housing Rehabilitation program continued to use zero interest loans, often with payment deferred until title transfer, to help income eligible homeowners who are unable to qualify for market rate financing to maintain decent, sanitary housing. Program priorities are to address code violations and immediate life safety issues that could result in property being determined uninhabitable, make accessibility improvements for seniors and persons with disabilities, as well as address aging mechanical systems to ensure a functional lifespan of ten years.

Due to the late release of 2018 entitlement funds and the high demands for recreation space in summer, renovations to Foster Field, a heavily programmed facility in the City’s Neighborhood Revitalization Strategy Area (NRSA), will be undertaken in 2019. In addition, several Public Facilities
projects of non-profit partners funded in 2017 and 2018 started in 2018 and are expected to complete in 2019. Public Facilities projects completed or substantially completed in 2018 include: Mason Park Field House Roof Replacement, an Alley Paving and Street Resurfacing project; all three are located in the NRSA. Safety improvements at Rice Center, a residential facility for severely abused and neglected children, are expected to complete by end of 2018. Other non-profit Public Facilities projects funded in prior years expected to complete in 2019 include: an addition to Infant Welfare Society’s Baby Toddler Nursery to provide needed indoor gross motor play space, new HVAC and accessibility improvements at Reba Early Learning Center, and lighting improvements in common areas of the McGaw YMCA Residence Facility for very low income men.

Ongoing challenges include identifying projects that are clearly defined and shovel ready. Evanston continues to try to fund larger, more impactful projects, rather than deferred maintenance, by prioritizing projects for facilities that have not been funded in the last three years. In 2019, funding was allocated to CJE Senior Life to install an alarm system on external doors at their facility that houses their day program for adults with Alzheimer's and the Senior Transportation program. Additional funding was allocated for the IWSE gross motor play addition.

The City continued to use CDBG and local funds to support a wide range of social services. Evanston agencies are challenged to meet the increasing demand for services and maintain organizational stability given 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. 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. Based on the Continuing Resolution passed by Congress to avoid a partial shutdown of the federal government that expires on December 7, 2018, the City anticipates receiving its 2019 grant amount after the start of its fiscal year on January 1, 2019.

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

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

No public comments were received during the extended public comment period that ran from October 13 to December 10, 2018.

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

No public comments were received during the extended public comment period that ran from October 13 to December 10, 2018, therefore, no comments or views were not accepted.

7. Summary
PR-05 Lead & Responsible Agencies – 91.200(b)

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

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

<table>
<thead>
<tr>
<th>Agency Role</th>
<th>Name</th>
<th>Department/Agency</th>
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<tr>
<td>CDBG Administrator</td>
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<td>Community Development</td>
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<td>HOME Administrator</td>
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<td>ESG Administrator</td>
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<td>Community Development</td>
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</table>

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
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 2019 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(l))

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 local and 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 until 2020.

The City’s application process for 2019 CDBG Public Services and City Mental Health Board funding is unified to allocate funds to the highest priority needs of the community and encourage collaboration among community partners. Additionally, reporting and monitoring practices are also unified 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 Finance and Governance Committees of the Alliance. Evanston agencies have staff who are Alliance members including Connections for the Homeless and Impact Behavioral Health Partners (formerly Housing Options for the Mentally Ill); these representatives 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 2019 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 2019 the Alliance will continue 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 2019 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, participates as a member of the Alliance on many levels. Connections staff serve on the HMIS Committee meeting and the monthly prevention meetings.
Participation on the Board and committees help to ensure clear communication of goals and priorities and decrease redundancies as they relate to ESG funding.

As discussed previously, the City prioritizes rapid re-housing. Due to high rent costs in Evanston, people housed with rapid re-housing often require a longer subsidy than other parts of the Continuum to become self-sufficient. Connections for the Homeless participated in the HUD survey of Rapid Re-Housing Programs. 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.

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. Access to HMIS for City staff that administer the General Assistance program is being arranged to better identify people receiving services through the Continuum and eliminate duplication of services. The City’s Human Services Specialist continues to further coordinate housing, health, mental health, and other social services for low- and moderate-income residents and at-risk residents and works closely with community partners including Connections for the Homeless to address housing needs and link clients to a wide variety of additional supportive services. Services can include, but are not limited to food, child and senior care, substance abuse cessation support, as well as mental and physical health services and services for individuals with developmental, intellectual and physical disabilities.

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

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<td><strong>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</strong></td>
<td>Attended planning meetings to develop needs assessment and provided data for relevant sections of the 2019 Action Plan.</td>
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<td>Housing Need Assessment</td>
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</tr>
<tr>
<td></td>
<td>Public Housing Needs</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Homeless Needs - Chronically homeless</td>
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<tr>
<td></td>
<td>Homeless Needs - Families with children</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Homelessness Needs - Veterans</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Homelessness Needs - Unaccompanied youth</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Homelessness Strategy</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Market Analysis</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Economic Development</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Anti-poverty Strategy</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Lead-based Paint Strategy</td>
<td></td>
</tr>
<tr>
<td>Agency/Group/Organization</td>
<td>Chicago Metropolitan Agency for Planning (CMAP)</td>
<td></td>
</tr>
<tr>
<td>---------------------------</td>
<td>-----------------------------------------------</td>
<td></td>
</tr>
</tbody>
</table>
| 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 2019 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**

<table>
<thead>
<tr>
<th>Name of Plan</th>
<th>Lead Organization</th>
<th>How do the goals of your Strategic Plan overlap with the goals of each plan?</th>
</tr>
</thead>
<tbody>
<tr>
<td>Continuum of Care</td>
<td>Alliance to End Homelessness in Suburban Cook County</td>
<td>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.</td>
</tr>
<tr>
<td>2016 Annual Comprehensive Housing Plan</td>
<td>Illinois Housing Development Authority</td>
<td>The City of Evanston works with IHDA to ensure continued access to affordable housing for Evanston's low and moderate income residents.</td>
</tr>
<tr>
<td>Name of Plan</td>
<td>Lead Organization</td>
<td>How do the goals of your Strategic Plan overlap with the goals of each plan?</td>
</tr>
<tr>
<td>--------------</td>
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<td>---------------------------------------------------------------------------</td>
</tr>
<tr>
<td>Red and Purple Line Modernization</td>
<td>Chicago Transit Authority</td>
<td>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.</td>
</tr>
<tr>
<td>Go To 2040</td>
<td>Chicago Metropolitan Agency for Planning</td>
<td>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.</td>
</tr>
<tr>
<td>2000 Evanston Comprehensive General Plan</td>
<td>City of Evanston</td>
<td>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.</td>
</tr>
<tr>
<td>Evanston Plan 2030</td>
<td>City of Evanston</td>
<td>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.</td>
</tr>
<tr>
<td>STAR Community Rating System</td>
<td>STAR Communities</td>
<td>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 &amp; energy, economy &amp; jobs, education, arts &amp; community, equity &amp; empowerment, health &amp; safety, and natural systems.</td>
</tr>
<tr>
<td>West Evanston Master Plan 2007</td>
<td>City of Evanston</td>
<td>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.</td>
</tr>
<tr>
<td>West Side Neighborhood Planning - 2005</td>
<td>City of Evanston</td>
<td>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.</td>
</tr>
<tr>
<td>Name of Plan</td>
<td>Lead Organization</td>
<td>How do the goals of your Strategic Plan overlap with the goals of each plan?</td>
</tr>
<tr>
<td>--------------------------------------------------</td>
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</tr>
<tr>
<td>EPLAN 2016-2021 Community Health Assessment</td>
<td>City of Evanston</td>
<td>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.</td>
</tr>
<tr>
<td>Evanston Climate Action Plan</td>
<td>City of Evanston</td>
<td>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 &amp; Land Use, Energy Efficiency &amp; Buildings, Renewable Energy Resources, Waste Reduction &amp; Recycling, Forestry, Prairie &amp; Carbon Offsets, Food Production &amp; Distribution, Policy &amp; Research, Education &amp; Engagement and Communications &amp; Public Relations.</td>
</tr>
<tr>
<td>Plan for Affordable Housing</td>
<td>City of Evanston</td>
<td>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.</td>
</tr>
<tr>
<td>Analysis of Impediments to Fair Housing Choice</td>
<td>City of Evanston</td>
<td>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.</td>
</tr>
<tr>
<td>Cook County Consolidated Plan 2015-2019</td>
<td>Cook County</td>
<td>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.</td>
</tr>
<tr>
<td>HACC 5 Year PHA Plan and Annual Plan</td>
<td>Housing Authority of Cook County</td>
<td>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.</td>
</tr>
</tbody>
</table>
Table 3 – Other local / regional / federal planning efforts

Narrative (optional)

All major agencies providing a full range of services in and around the City of Evanston were consulted or contacted to request comments/input.
AP-12 Participation – 91.105, 91.200(c)

1. Summary of citizen participation process/Efforts made to broaden citizen participation
Summarize citizen participation process and how it impacted goal-setting

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

The City of Evanston invited public comment on the draft 2019 Action Plan in a 30-day period from October 15 to November 13, 2018, 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. Non-profits and individuals who have requested information on the City’s Consolidated Plan receive an email notifying them of the opening of the public comment period for the draft Action Plan. A link to the draft Action Plan on the City’s website, as well as the location where printed copies of the plan may be reviewed is included in all forms of communication. People may 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 December 10, 2018 at 5:30pm.

No comments were received on the 2019 Action Plan, so none are summarized in Section 5. Summary of Public Comments, above.

See items 7 and 8 for information on the citizen participation process and input relating to the CARES Act Substantial Amendments.
## Citizen Participation Outreach

<table>
<thead>
<tr>
<th>Sort Order</th>
<th>Mode of Outreach</th>
<th>Target of Outreach</th>
<th>Summary of response/attendance</th>
<th>Summary of comments received</th>
<th>Summary of comments not accepted and reasons</th>
<th>URL (If applicable)</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Public Meeting</td>
<td>Non-targeted/broad community</td>
<td>No attendees were present.</td>
<td>No comments were received.</td>
<td></td>
<td><a href="https://www.cityofevanston.org/government/agendas-minutes/special-council-committees/housing-community-development-act-committee">https://www.cityofevanston.org/government/agendas-minutes/special-council-committees/housing-community-development-act-committee</a></td>
</tr>
<tr>
<td>Sort Order</td>
<td>Mode of Outreach</td>
<td>Target of Outreach</td>
<td>Summary of response/attendance</td>
<td>Summary of comments received</td>
<td>Summary of comments not accepted and reasons</td>
<td>URL (If applicable)</td>
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</tr>
<tr>
<td>2</td>
<td>Newspaper Ad</td>
<td>Minorities Non-targeted/broad community</td>
<td>Display ad in the October 4, 2018 issue of the Evanston RoundTable, a newspaper of general circulation, that the draft 2019 Action Plan is available on the City’s website and in printed format at the Civic Center beginning October 15, 2018 for the 30-day public comment period. The ad also highlights the meeting of the Housing and Community Development Act Committee on November 13, 2018, at which input from the public was being sought. The Evanston</td>
<td>No comments were received.</td>
<td>Annual Action Plan 2019</td>
<td><a href="http://www.cityofevanston.org/2019actionplan">http://www.cityofevanston.org/2019actionplan</a></td>
</tr>
<tr>
<td>Sort Order</td>
<td>Mode of Outreach</td>
<td>Target of Outreach</td>
<td>Summary of response/attendance</td>
<td>Summary of comments received</td>
<td>Summary of comments not accepted and reasons</td>
<td>URL (If applicable)</td>
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</tr>
<tr>
<td>3</td>
<td>Internet Outreach</td>
<td>Non-targeted/broad community</td>
<td>News item on the City's homepage and in an e-newsletter story that the 2019 Action Plan draft was available on the City website and also in printed format beginning October 13, 2018. No response could be attributed specifically to the internet outreach.</td>
<td>No comments received.</td>
<td></td>
<td><a href="http://www.cityofevanston.org/2019actionplan">http://www.cityofevanston.org/2019actionplan</a></td>
</tr>
<tr>
<td>4</td>
<td>Internet Outreach</td>
<td>Non-targeted/broad community</td>
<td>Non-targeted/broad community people who are active on social media</td>
<td>No comments were received.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Sort Order</td>
<td>Mode of Outreach</td>
<td>Target of Outreach</td>
<td>Summary of response/attendance</td>
<td>Summary of comments received</td>
<td>Summary of comments not accepted and reasons</td>
<td>URL (If applicable)</td>
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</tr>
<tr>
<td>5</td>
<td>Bulletin board postings at community centers and the Public Library</td>
<td>Minorities</td>
<td>No comments were received.</td>
<td></td>
<td></td>
<td><a href="http://www.cityofevanston.org/2019actionplan">http://www.cityofevanston.org/2019actionplan</a></td>
</tr>
<tr>
<td>6</td>
<td>Outreach through ward alderman at ward meetings and via email</td>
<td>Minorities, Ward has significant Black/African-American and Hispanic population</td>
<td>No comments were received.</td>
<td></td>
<td></td>
<td><a href="http://www.cityofevanston.org/2019actionplan">http://www.cityofevanston.org/2019actionplan</a></td>
</tr>
<tr>
<td>Sort Order</td>
<td>Mode of Outreach</td>
<td>Target of Outreach</td>
<td>Summary of response/attendance</td>
<td>Summary of comments received</td>
<td>Summary of comments not accepted and reasons</td>
<td>URL (If applicable)</td>
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</tr>
<tr>
<td>7</td>
<td>Internet Outreach</td>
<td>Non-targeted/broad community</td>
<td>CARES Act Substantial Amendments were posted on the City website, in a news item on the homepage, in an opt-in email to individuals/organizations about ConPlan-related activities, and posted on the City’s Facebook and Twitter accounts for the 5-day public comment period starting June 1, 2020. Betty Bogg provided comment on behalf of Connections for the Homeless via email about the need for transparency relating to how funds will be used, including reimbursement for City and NPO expenses not covered by FEMA. It was also requested that the City disclose the intended recipients of the money allocated for all projects/activities, specifically.</td>
<td>All comments submitted are accepted. The amended Citizen Participation Plan for CARES Act funding outlines the public process that will be followed for all funding allocations.</td>
<td><a href="https://www.cityofevanston.org/home/showdocument?id=57546">https://www.cityofevanston.org/home/showdocument?id=57546</a></td>
<td></td>
</tr>
</tbody>
</table>
| Sort Or
der | Mode of Outreach | Target of Outreach | Summary of response/attendance | Summary of comments received | Summary of comments not accepted and reasons | URL (If applicable) |
<table>
<thead>
<tr>
<th></th>
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<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>8</td>
<td>Public Meeting</td>
<td>Non-targeted/broad community</td>
<td>The public comment period on the CARES Act Substantial Amendments was closed at the conclusion of public comment at the virtual City Council meeting on June 8, 2020. City Council voted unanimously to approve the Substantial Amendments at that meeting.</td>
<td>No comments on the CARES Act Substantial Amendments were made at the June 8, 2020 City Council meeting during public comment.</td>
<td></td>
<td><a href="https://www.cityofevanston.org/home/show">https://www.cityofevanston.org/home/show</a> document?id=57600</td>
</tr>
</tbody>
</table>

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 2019 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**

<table>
<thead>
<tr>
<th>Program</th>
<th>Source of Funds</th>
<th>Uses of Funds</th>
<th>Expected Amount Available Year 1</th>
<th>Narrative Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>CDBG</td>
<td>public - federal</td>
<td>Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services</td>
<td>Annual Allocation: $1,803,432, Program Income: $131,497, Prior Year Resources: $24,947, Total: $1,959,876</td>
<td>Prior year resources include $24,947 in reallocated funds, and $131,497 in program income.</td>
</tr>
<tr>
<td>Program</td>
<td>Source of Funds</td>
<td>Uses of Funds</td>
<td>Expected Amount Available Year 1</td>
<td>Narrative Description</td>
</tr>
<tr>
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<td>-----------------------</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Annual Allocation: $</td>
<td>Program Income: $</td>
</tr>
<tr>
<td>HOME</td>
<td>public - federal</td>
<td>Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA</td>
<td>355,216</td>
<td>29,541</td>
</tr>
<tr>
<td>Program</td>
<td>Source of Funds</td>
<td>Uses of Funds</td>
<td>Expected Amount Available Year 1</td>
<td>Narrative Description</td>
</tr>
<tr>
<td>-------------------------------</td>
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<tr>
<td></td>
<td></td>
<td>Annual Allocation: $151,731 Program Income: $0 Prior Year Resources: $0 Total: $151,731 Remainder of ConPlan: $0</td>
<td>There are no ESG funds from prior years reallocated in this plan.</td>
<td></td>
</tr>
<tr>
<td>ESG</td>
<td>public - federal</td>
<td>Conversion and rehab for transitional housing Financial Assistance Overnight shelter Rapid re-housing (rental assistance) Rental Assistance Services Transitional housing</td>
<td>151,731 0 0 151,731 0</td>
<td></td>
</tr>
<tr>
<td>Competitive McKinney- Vento Homeless Assistance Act</td>
<td>public - federal</td>
<td>Housing Rapid re-housing (rental assistance) Rental Assistance Services Transitional housing</td>
<td>1,100,000 0 0 1,100,000 0</td>
<td>Funding through the Continuum of Care for Evanston based projects and programs.</td>
</tr>
<tr>
<td>Program</td>
<td>Source of Funds</td>
<td>Uses of Funds</td>
<td>Expected Amount Available Year 1</td>
<td>Expected Amount Available Remainder of ConPlan</td>
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<td>-----------------------------------------------</td>
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<tr>
<td></td>
<td></td>
<td></td>
<td>Expected Allocation: $</td>
<td>Program Income: $</td>
</tr>
<tr>
<td>Other</td>
<td>public - federal</td>
<td>Other</td>
<td>2,046,557</td>
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</tr>
<tr>
<td>Other</td>
<td>public - local</td>
<td>Acquisition</td>
<td>750,000</td>
<td>0</td>
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<tr>
<td></td>
<td></td>
<td>Homebuyer</td>
<td></td>
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<td></td>
<td></td>
<td>assistance</td>
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<td></td>
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<td></td>
<td></td>
<td>Housing</td>
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<td></td>
<td></td>
<td>Multifamily</td>
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<td></td>
<td></td>
<td>rental new</td>
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<td></td>
<td></td>
<td>construction</td>
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<td></td>
<td>Multifamily</td>
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<td></td>
<td>rental rehab</td>
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<td></td>
<td></td>
<td>New construction for ownership</td>
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<td></td>
<td></td>
<td>Overnight shelter</td>
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<td></td>
<td></td>
<td>Public Services</td>
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<td></td>
<td></td>
<td>Rental Assistance</td>
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<td></td>
<td>TBRA</td>
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<td></td>
<td></td>
<td>Transitional housing</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Other</td>
<td>public - local</td>
<td>Public Services</td>
<td>486,000</td>
<td>0</td>
</tr>
</tbody>
</table>

Table 5 - Expected Resources – Priority Table

Annual Action Plan 2019
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 publicly 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, the new home of Theo Ubique, is opening in December 2018, 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 and the City's NRSA. Between six and eight of these parcels are expected to be acquired by early 2019 and will 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

<table>
<thead>
<tr>
<th>Sort Order</th>
<th>Goal Name</th>
<th>Start Year</th>
<th>End Year</th>
<th>Category</th>
<th>Geographic Area</th>
<th>Needs Addressed</th>
<th>Funding</th>
<th>Goal Outcome Indicator</th>
</tr>
</thead>
</table>
| 1          | Affordable Housing | 2015       | 2019     | Affordable Housing | Entire Jurisdiction | Access to Rental Housing
Maintain and Improve Rental Housing
Homeownership                                                                 | CDBG: $822,190
HOME: $247,036 | Rental units rehabilitated: 2
Household Housing Unit
Homeowner Housing
Rehabilitated: 10 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: $15,020
HOME: $102,200
ESG: $140,352 | Tenant-based rental assistance /
Rapid Rehousing: 30 Households Assisted
Homeless Person Overnight Shelter: 300 Persons Assisted
Homelessness Prevention: 5 Persons Assisted
Other: 200 Other |
<table>
<thead>
<tr>
<th>Sort Order</th>
<th>Goal Name</th>
<th>Start Year</th>
<th>End Year</th>
<th>Category</th>
<th>Geographic Area</th>
<th>Needs Addressed</th>
<th>Funding</th>
<th>Goal Outcome Indicator</th>
</tr>
</thead>
<tbody>
<tr>
<td>3</td>
<td>Creating Livable Communities</td>
<td>2015</td>
<td>2019</td>
<td>Non-Housing Community Development</td>
<td>Entire Jurisdiction</td>
<td>Public Infrastructure Public Facilities</td>
<td>CDBG: $486,761</td>
<td>Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 5000 Persons Assisted Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit: 2 Households Assisted</td>
</tr>
<tr>
<td>4</td>
<td>Economic Development</td>
<td>2015</td>
<td>2019</td>
<td>Non-Housing Community Development</td>
<td>CDBG TARGET AREA</td>
<td>Economic Development</td>
<td>Businesses assisted: 1 Businesses Assisted</td>
<td></td>
</tr>
<tr>
<td>5</td>
<td>Public Services</td>
<td>2015</td>
<td>2019</td>
<td>Non-Homeless Special Needs Non-Housing Community Development</td>
<td>Entire Jurisdiction</td>
<td>Public Services</td>
<td>CDBG: $275,219</td>
<td>Public service activities other than Low/Moderate Income Housing Benefit: 30000 Persons Assisted</td>
</tr>
<tr>
<td>6</td>
<td>Planning and Administration</td>
<td>2015</td>
<td>2019</td>
<td>Planning and Administration</td>
<td></td>
<td></td>
<td>CDBG: $360,686 HOME: $35,521 ESG: $11,379</td>
<td></td>
</tr>
<tr>
<td>Sort Order</td>
<td>Goal Name</td>
<td>Start Year</td>
<td>End Year</td>
<td>Category</td>
<td>Geographic Area</td>
<td>Needs Addressed</td>
<td>Funding</td>
<td>Goal Outcome Indicator</td>
</tr>
<tr>
<td>------------</td>
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<td>------------------------</td>
</tr>
<tr>
<td>7</td>
<td>COVID-19</td>
<td>2020</td>
<td>2022</td>
<td>Affordable Housing Homeless</td>
<td>Entire Jurisdiction</td>
<td>Access to Rental Housing</td>
<td>CDBG: $97,400</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Emergency/Urgent Needs</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Economic Housing</td>
<td>CDBG-CV: $1,080,243</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Development</td>
<td>ESG-CV: $966,314</td>
<td></td>
</tr>
</tbody>
</table>

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 rehousing, and tenant based rental assistance. During 2019, 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. Economic development activities undertaken in 2019 will be funded with CDBG allocated for these activities in prior years; no 2019 funds were allocated for this goal. |
| 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. |
| 7 | Goal Name | COVID-19 Emergency/Urgent Needs |
|   | Goal Description | This goal has been added in the substantial amendment to the FY2019 Action Plan to prevent, prepare for, and respond to the coronavirus using CDBG-CV and ESG-CV funding from the CARES Act and FY2019 CDBG entitlement that is being reallocated to this goal. |
Projects

AP-35 Projects – 91.220(d)

Introduction

The City has identified the following projects to be implemented in 2019 to achieve the goals in the Consolidated Plan. This includes activities funded in prior years which will be completed and/or funds disbursed in 2019. The Emergency Solutions Grant project will address the needs of homeless individuals, families and households fleeing domestic violence. The Tenant Based Rental Assistance (TBRA) project will address the needs of homeless families with children with direct rental and utilities assistance. The Rental Housing Project combines both HOME and CDBG activities, both which are for rental rehabilitation.

Projects

<table>
<thead>
<tr>
<th>#</th>
<th>Project Name</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>ESG</td>
</tr>
<tr>
<td>2</td>
<td>Tenant Based Rental Assistance (TBRA)</td>
</tr>
<tr>
<td>3</td>
<td>Rental Housing</td>
</tr>
<tr>
<td>4</td>
<td>Homeowner Rehabilitation</td>
</tr>
<tr>
<td>5</td>
<td>Code Enforcement</td>
</tr>
<tr>
<td>6</td>
<td>Public Services</td>
</tr>
<tr>
<td>7</td>
<td>Economic Development</td>
</tr>
<tr>
<td>8</td>
<td>Public Facilities and Infrastructure</td>
</tr>
<tr>
<td>9</td>
<td>Administration</td>
</tr>
<tr>
<td>10</td>
<td>CV-Public Services</td>
</tr>
<tr>
<td>11</td>
<td>CV-Economic Development</td>
</tr>
<tr>
<td>12</td>
<td>CV-Administration</td>
</tr>
<tr>
<td>13</td>
<td>ESG20 - Evanston</td>
</tr>
</tbody>
</table>

Table 7 - Project Information

Describe the reasons for allocation priorities and any obstacles to addressing underserved needs
AP-38 Project Summary
Project Summary Information
<table>
<thead>
<tr>
<th></th>
<th>Project Name</th>
<th>ESG</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Target Area</strong></td>
<td>Entire Jurisdiction</td>
<td></td>
</tr>
<tr>
<td><strong>Goals Supported</strong></td>
<td>Homelessness</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>Public Services</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Planning and Administration</td>
</tr>
<tr>
<td><strong>Needs Addressed</strong></td>
<td>Access to Rental Housing</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>Public Services</td>
</tr>
<tr>
<td><strong>Funding</strong></td>
<td>ESG: $151,731</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>Competitive McKinney-Vento Homeless</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Assistance Act: $1,100,000</td>
</tr>
<tr>
<td><strong>Description</strong></td>
<td>Homeless prevention, rapid re-housing,</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>street outreach, and overnight shelter.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Administration of ESG program.</td>
</tr>
<tr>
<td><strong>Target Date</strong></td>
<td>7/1/2021</td>
<td></td>
</tr>
<tr>
<td><strong>Estimate the number and type of</strong></td>
<td>Street outreach is anticipated to serve</td>
<td></td>
</tr>
<tr>
<td></td>
<td>families that will benefit from</td>
<td>50 homeless individuals; overnight</td>
</tr>
<tr>
<td></td>
<td>the proposed activities**</td>
<td>shelter is anticipated to serve 320</td>
</tr>
<tr>
<td></td>
<td></td>
<td>persons/families who are generally</td>
</tr>
<tr>
<td></td>
<td></td>
<td>without income to 30% AMI; prevention</td>
</tr>
<tr>
<td></td>
<td></td>
<td>is expected to serve 5 households up to</td>
</tr>
<tr>
<td></td>
<td></td>
<td>30% AMI; rapid rehousing is expected to</td>
</tr>
<tr>
<td></td>
<td></td>
<td>serve 10 households that are literally</td>
</tr>
<tr>
<td></td>
<td></td>
<td>homeless.</td>
</tr>
<tr>
<td><strong>Location Description</strong></td>
<td>Street Outreach is conducted at places</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>where homeless individuals are known to</td>
</tr>
<tr>
<td></td>
<td></td>
<td>gather, including the public libraries,</td>
</tr>
<tr>
<td></td>
<td></td>
<td>24-hour fast food restaurants, and in</td>
</tr>
<tr>
<td></td>
<td></td>
<td>parks, under bridges and on the beaches</td>
</tr>
<tr>
<td></td>
<td></td>
<td>in warmer months, as well as Connections</td>
</tr>
<tr>
<td></td>
<td></td>
<td>for the Homeless and the YWCA Evanston-</td>
</tr>
<tr>
<td></td>
<td></td>
<td>North Shore facilities. Interfaith</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Action Emergency Overnight Shelter</td>
</tr>
<tr>
<td><strong>Planned Activities</strong></td>
<td>Direct rental assistance, supportive</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>services, shelter operations, and street</td>
</tr>
<tr>
<td></td>
<td></td>
<td>outreach. ESG Administration is also</td>
</tr>
<tr>
<td></td>
<td></td>
<td>shown in this project and is not reflected</td>
</tr>
<tr>
<td></td>
<td></td>
<td>in the Administration project.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th></th>
<th>Project Name</th>
<th>Tenant Based Rental Assistance (TBRA)</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Target Area</strong></td>
<td>Entire Jurisdiction</td>
<td></td>
</tr>
<tr>
<td><strong>Goals Supported</strong></td>
<td>Homelessness</td>
<td></td>
</tr>
<tr>
<td><strong>Needs Addressed</strong></td>
<td>Access to Rental Housing</td>
<td></td>
</tr>
<tr>
<td><strong>Funding</strong></td>
<td>HOME: $102,200</td>
<td></td>
</tr>
<tr>
<td><strong>Description</strong></td>
<td>Direct rental and utility assistance.</td>
<td></td>
</tr>
<tr>
<td><strong>Target Date</strong></td>
<td>9/1/2020</td>
<td></td>
</tr>
<tr>
<td>Estimate the number and type of families that will benefit from the proposed activities</td>
<td>It is anticipated that 20 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.</td>
<td></td>
</tr>
<tr>
<td>---</td>
<td>---</td>
<td></td>
</tr>
<tr>
<td>Location Description</td>
<td>Households will choose rental units throughout the city based on factors such as what schools their children attend and where adults work.</td>
<td></td>
</tr>
<tr>
<td>Planned Activities</td>
<td>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.</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Project Name</th>
<th>Rental Housing</th>
</tr>
</thead>
</table>
| Target Area | Entire Jurisdiction
Evanston NRSA - Proposed |
| Goals Supported | Affordable Housing |
| Needs Addressed | Maintain and Improve Rental Housing |
| Funding | CDBG: $60,000
HOME: $247,036
Affordable Housing Fund: $250,000 |
| Description | Rental housing development or rehabilitation. |
| Target Date | 12/31/2020 |
| Estimate the number and type of families that will benefit from the proposed activities | An estimated two units of rental housing will be acquired or improved. Tenants will be at or below 60% AMI if HOME funded and at or below 80% AMI if CDBG funded. HOME CHDO REserve funds from 2018 and 2019 are included in this project. |
| 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. |

<table>
<thead>
<tr>
<th>Project Name</th>
<th>Homeowner Rehabilitation</th>
</tr>
</thead>
</table>
| Target Area | CDBG TARGET AREA
Entire Jurisdiction
Evanston NRSA - Proposed |
<p>| Goals Supported | Affordable Housing |</p>
<table>
<thead>
<tr>
<th><strong>Needs Addressed</strong></th>
<th>Maintain and Improve Owner Occupied Housing</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Funding</strong></td>
<td>CDBG: $347,190</td>
</tr>
<tr>
<td><strong>Description</strong></td>
<td>Rehabilitation of owner-occupied homes throughout Evanston, owned and occupied by low and moderate income households.</td>
</tr>
<tr>
<td><strong>Target Date</strong></td>
<td>12/31/2019</td>
</tr>
<tr>
<td><strong>Estimate the number and type of families that will benefit from the proposed activities</strong></td>
<td>It is estimated that ten units of owner-occupied housing will be rehabbed using CDBG throughout the City's Housing Rehab program. This includes the new Lead Service Line replacement program. Household income may not exceed 80% AMI.</td>
</tr>
<tr>
<td><strong>Location Description</strong></td>
<td>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.</td>
</tr>
<tr>
<td><strong>Planned Activities</strong></td>
<td>Homeowner Rehabilitation Program, including direct rehabilitation loans and program administration.</td>
</tr>
</tbody>
</table>

5

<table>
<thead>
<tr>
<th><strong>Project Name</strong></th>
<th>Code Enforcement</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Target Area</strong></td>
<td>CDBG TARGET AREA</td>
</tr>
<tr>
<td></td>
<td>Evanston NRSA - Proposed</td>
</tr>
<tr>
<td><strong>Goals Supported</strong></td>
<td>Affordable Housing</td>
</tr>
<tr>
<td></td>
<td>Creating Livable Communities</td>
</tr>
<tr>
<td><strong>Needs Addressed</strong></td>
<td>Maintain and Improve Rental Housing</td>
</tr>
<tr>
<td></td>
<td>Maintain and Improve Owner Occupied Housing</td>
</tr>
<tr>
<td><strong>Funding</strong></td>
<td>CDBG: $415,000</td>
</tr>
<tr>
<td><strong>Description</strong></td>
<td>Code enforcement inspections in the CDBG Target Area to identify code violations. Demolition/clearance undertaken to address code violations identified by code enforcement inspectors is also included in this project.</td>
</tr>
<tr>
<td><strong>Target Date</strong></td>
<td>12/31/2019</td>
</tr>
<tr>
<td><strong>Estimate the number and type of families that will benefit from the proposed activities</strong></td>
<td>CDBG Code Enforcement will directly benefit the residents of the 2,000 units anticipated to be inspected. In addition, the CDBG Target Area in which code inspections are undertaken is primarily low/moderate income.</td>
</tr>
<tr>
<td><strong>Location Description</strong></td>
<td>CDBG Code Enforcement is undertaken in the CDBG Target Area. See map. The NRSA is included in the CDBG Target Area.</td>
</tr>
<tr>
<td><strong>Planned Activities</strong></td>
<td>Code enforcement inspections in the CDBG Target Area, including necessary building demolition/clearance or rehabilitation as identified by code enforcement inspectors.</td>
</tr>
<tr>
<td></td>
<td>Project Name</td>
</tr>
<tr>
<td>---</td>
<td>--------------</td>
</tr>
<tr>
<td></td>
<td>Target Area</td>
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<td></td>
<td>Goals Supported</td>
</tr>
<tr>
<td></td>
<td>Needs Addressed</td>
</tr>
<tr>
<td></td>
<td>Funding</td>
</tr>
</tbody>
</table>

### Project Name: Public Services

| **Target Area** | CDBG TARGET AREA  
Entire Jurisdiction  
Evanston NRSA - Proposed |
| **Goals Supported** | Homelessness  
Creating Livable Communities  
Public Services |
| **Needs Addressed** | Public Services |
| **Funding** | CDBG: $290,239  
Affordable Housing Fund: $75,000  
MHB Funds: $486,300 |
| **Description** | Public services are provided to low- and moderate-income residents throughout the City of Evanston, including youth programs, senior services, employment services, legal services, graffiti removal, and domestic violence services. |
| **Target Date** | 12/31/2019 |
| **Estimate the number and type of families that will benefit from the proposed activities** | It is anticipated that 30,000 income eligible people 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 NRSA and CDBG Target Area. |
| **Planned Activities** | The following activities are the public services allocated CDBG grants in 2019: Target Area Graffiti Removal, Summer Youth Employment Program, Certificate of Rehabilitation and Record Sealing, After School Youth Program, Legal and Social Services to Youth and Families, Home Delivered Meals, Grandparents Raising Grandchildren, Youth Workforce Training, College Readiness for Teens, services for PSH residents, domestic violence case management and services. In addition, the emergency overnight shelter is included here. |

### Project Name: Economic Development

| **Target Area** | CDBG TARGET AREA  
Evanston NRSA - Proposed |
| **Goals Supported** | Economic Development |
| **Needs Addressed** | Economic Development |
| **Funding** | Economic Development |

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OMB Control No: 2506-0117 (exp. 06/30/2018)
<table>
<thead>
<tr>
<th>Description</th>
<th>Economic development activities include technical assistance, loans or grants to startups and microenterprises, and new or expanding businesses. 2019 CDBG is not allocated for economic development activities; prior year funding will be used for any activities funded.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Target Date</td>
<td>12/31/2019</td>
</tr>
<tr>
<td>Estimate the number and type of families that will benefit from the proposed activities</td>
<td>It is anticipated that one business will be assisted.</td>
</tr>
<tr>
<td>Location Description</td>
<td>Businesses in west Evanston and on Howard Street will be prioritized for assistance.</td>
</tr>
<tr>
<td>Planned Activities</td>
<td>The City of Evanston uses CDBG to provide technical assistance to microenterprises and entrepreneurs, and for grants or loans to eligible businesses.</td>
</tr>
<tr>
<td>Project Name</td>
<td>Public Facilities and Infrastructure</td>
</tr>
</tbody>
</table>
| Target Area | CDBG TARGET AREA  
Evanston NRSA - Proposed |
| Goals Supported | Creating Livable Communities |
| Needs Addressed | Public Infrastructure  
Public Facilities |
| Funding | CDBG: $486,761 |
| Description | Activities take place throughout the City, concentrated in low- and moderate-income neighborhoods with LMI population at or above 45.13% (exception criterion). Most of the improvements will take place in the CDBG Target Area and/or the proposed NRSA. |
| Target Date | 12/31/2019 |
| Estimate the number and type of families that will benefit from the proposed activities | It is estimated approximately 5,000 primarily low- and moderate-income persons will benefit from these activities. |
| Location Description | Activities take place throughout the City, concentrated in low- and moderate-income neighborhoods with LMI population at or above 45.13% (exception criterion). Most of the improvements will take place in the CDBG Target Area and/or the proposed NRSA. |
Planned Activities | Activities funded in 2019 are: Alley Paving, Park Improvements, and two non-profit facilities improvements. All projects are identified as high priority needs in the City's Consolidated Plan. Activities funded in prior years that will carry over in 2019 include improvements to Infant Welfare Society, Reba Early Learning Center, McGaw YMCA Men's Residence common areas, and Foster Field Improvements, as well as Alley Special Assessment Assistance.

<table>
<thead>
<tr>
<th>Project Name</th>
<th>Administration</th>
</tr>
</thead>
<tbody>
<tr>
<td>Target Area</td>
<td>Entire Jurisdiction</td>
</tr>
<tr>
<td>Goals Supported</td>
<td>Planning and Administration</td>
</tr>
<tr>
<td>Needs Addressed</td>
<td>Access to Rental Housing, Maintain and Improve Rental Housing, Maintain and Improve Owner Occupied Housing, Economic Development, Public Infrastructure, Public Facilities, Public Services, Homeownership</td>
</tr>
<tr>
<td>Funding</td>
<td>CDBG: $263,285, HOME: $31,521</td>
</tr>
<tr>
<td>Description</td>
<td>Administration of CDBG and HOME.</td>
</tr>
<tr>
<td>Target Date</td>
<td>12/31/2021</td>
</tr>
<tr>
<td>Estimate the number and type of families that will benefit from the proposed activities</td>
<td></td>
</tr>
<tr>
<td>Location Description</td>
<td></td>
</tr>
<tr>
<td>Planned Activities</td>
<td>Administration and financial management of CDBG and HOME grants. ESG Administration is in the ESG Project.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Project Name</th>
<th>CV-Public Services</th>
</tr>
</thead>
<tbody>
<tr>
<td>Target Area</td>
<td>Entire Jurisdiction</td>
</tr>
<tr>
<td>Goals Supported</td>
<td>COVID-19 Emergency/Urgent Needs</td>
</tr>
<tr>
<td>Needs Addressed</td>
<td>Maintain and Improve Rental Housing, Public Services</td>
</tr>
</tbody>
</table>
| **Funding** | CDBG: $97,400  
| | CDBG-CV: $664,194 |
| **Description** | To prevent, prepare for, and respond to the coronavirus. |
| **Target Date** | 12/31/2022 |
| **Estimate the number and type of families that will benefit from the proposed activities** | An estimated 5,000 households affected by the coronavirus will benefit from these activities. |
| **Location Description** | Activities will be conducted throughout Evanston. |
| **Planned Activities** | Rent assistance, utilities assistance, food assistance, child care assistance, shelter operations, street outreach, case management, 25% of emergency costs not covered by FEMA. |

**Project Name**: CV-Economic Development

**Target Area**: CDBG TARGET AREA  
| | Evanston NRSA - Proposed |
| **Goals Supported** | COVID-19 Emergency/Urgent Needs |
| **Needs Addressed** | Economic Development |
| **Funding** | CDBG-CV: $200,000 |
| **Description** | Economic development support to prevent, prepare for, and respond to the coronavirus. |
| **Target Date** | 12/31/2022 |
| **Estimate the number and type of families that will benefit from the proposed activities** | An estimated 70 businesses, particularly LMI micro-enterprises, affected by the coronavirus will be assisted. |
| **Location Description** | Activities will be focused in the CDG Target area and NRSA. |
| **Planned Activities** | Forgivable loans/grants to micro-enterprises, direct assistance to for profit businesses, transition to digital marketing. |

**Project Name**: CV-Administration

**Target Area**: Entire Jurisdiction

**Goals Supported**: COVID-19 Emergency/Urgent Needs

**Needs Addressed**: Access to Rental Housing  
| | Economic Development  
<p>| | Public Services |</p>
<table>
<thead>
<tr>
<th>Funding</th>
<th>CDBG-CV: $216,048</th>
</tr>
</thead>
<tbody>
<tr>
<td>Description</td>
<td></td>
</tr>
<tr>
<td>Target Date</td>
<td>12/31/2022</td>
</tr>
<tr>
<td>Estimate the number and type of families that will benefit from the proposed activities</td>
<td>CDBG-CV will benefit families affected by COVID-19, estimated at 10,000 households, through a broad range of activities to prevent, prepare for, and respond to the coronavirus.</td>
</tr>
<tr>
<td>Location Description</td>
<td>CDBG-CV administration will be undertaken throughout the community.</td>
</tr>
<tr>
<td>Planned Activities</td>
<td>Planning, administration and compliance of CDBG-CV funded activities.</td>
</tr>
</tbody>
</table>

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<table>
<thead>
<tr>
<th>Project Name</th>
<th>ESG20 - Evanston</th>
</tr>
</thead>
<tbody>
<tr>
<td>Target Area</td>
<td>Entire Jurisdiction</td>
</tr>
</tbody>
</table>
| Goals Supported | Homelessness  
Public Services  
Planning and Administration  
COVID-19 Emergency/Urgent Needs |
| Needs Addressed | Access to Rental Housing  
Public Services |
| Funding      | ESG: $158,463  
ESG-CV: $966,314 |
| Description  | Homeless prevention, rapid re-housing, street outreach, overnight shelters, and administration of program. |
| Target Date  | 12/31/2022       |
| Estimate the number and type of families that will benefit from the proposed activities | |
| Location Description | Outreach, Rapid Re-housing and Prevention activities will take place throughout Evanston. Shelter activities will take place at existing facilities, including Connections for the Homeless' Hilda's Place and the YWCA. |
| Planned Activities |         |
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

<table>
<thead>
<tr>
<th>Target Area</th>
<th>Percentage of Funds</th>
</tr>
</thead>
<tbody>
<tr>
<td>CDBG TARGET AREA</td>
<td>40</td>
</tr>
<tr>
<td>Entire Jurisdiction</td>
<td>20</td>
</tr>
<tr>
<td>Evanston NRSA - Proposed</td>
<td>40</td>
</tr>
</tbody>
</table>

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

<table>
<thead>
<tr>
<th>One Year Goals for the Number of Households to be Supported</th>
</tr>
</thead>
<tbody>
<tr>
<td>Homeless</td>
</tr>
<tr>
<td>Non-Homeless</td>
</tr>
<tr>
<td>Special-Needs</td>
</tr>
<tr>
<td>Total</td>
</tr>
</tbody>
</table>

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

<table>
<thead>
<tr>
<th>One Year Goals for the Number of Households Supported Through</th>
</tr>
</thead>
<tbody>
<tr>
<td>Rental Assistance</td>
</tr>
<tr>
<td>The Production of New Units</td>
</tr>
<tr>
<td>Rehab of Existing Units</td>
</tr>
<tr>
<td>Acquisition of Existing Units</td>
</tr>
<tr>
<td>Total</td>
</tr>
</tbody>
</table>

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

Discussion

There are a number of housing activities that will be continued in 2019 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 2019.
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 Housing Authority of Cook County and the City are in the concept stages of planning a second housing development with approximately 80-100 units on the parking lot of the Jane R Perlman Senior Apartments. This development would be mixed income, with some units at 50% AMI, some at 60% and 80% AMI and some at market rate. It is being designed to address the “missing middle” income rental market for seniors. In addition, a joint project on South Boulevard just east of Chicago Avenue is being discussed on a City-owned parking lot that is adjacent to a four unit HACC building that has family units (2- and 3-bedrooms). The development would better utilize land in a Transit-Oriented location through the development of a mixed income rental project comprising public housing, moderate income, and market rate units, a mix of studios, 1-, 2-, and 3-bedroom units. Different financing options are being evaluated for both 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 2019 (the fifth year of the 2015-2019 Consolidated Plan) are a continuation of those undertaken in 2018. 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’ team works throughout the community visiting parks, libraries, and places where people who are homeless are known to congregate. The team also works closely with the Evanston Police Department, the Evanston Public Library, hospitals, and other community groups to reach people in need. Connections staff works to develop a relationship with each client in order to complete a full assessment, and, if appropriate, add the person’s name to the Alliance to End Homelessness in Suburban Cook County’s waiting list to access a supportive housing unit for the chronically homeless. Clients can also access Connections’ drop-in services, including case management, food, clothing, laundry, showers, and storage services, as well as health and wellness services, and education and employment supports. Clients work with case managers to develop individual case plans that include a range of goals related to housing, benefits, and finances. Case managers also provide referrals for specialty services including substance abuse treatment and supported employment. Connections works closely with Interfaith Action of Evanston, which runs a daily hospitality center for people who are homeless to access a meal and respite from the weather. Connections offers services to anyone seeking them and does not discriminate on any basis, including race, ancestry, gender identity, religion, disability, age, sexual orientation, veteran status, or any other status.

Addressing the emergency shelter and transitional housing needs of homeless persons

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 2019. 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 2019 and establishing a landlord mitigation fund using Affordable Housing Funds is under evaluation to incentivize landlords to accept assisted households as tenants.

In 2018, 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 2018, 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 5 households with ESG prevention funds in 2019.

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 uses ESG funds to provide operating support for Hilda's Place, Connections for the Homeless' 18-bed congregate living 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. Hilda's Place provides clients with housing for up to one year and the YWCA provides housing for up 90 days. Hilda's Place provides approximately 30 male-identifying clients with housing annually and offers all of their services in accordance with participants' gender identity. This is a reduction from prior years and is due to the increased length of stay to provide needed stability to those using shelter services. Approximately 250 women and children who are victims of domestic violence are provided housing annually by the YWCA. These same levels of services are projected for 2019.

Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: being discharged from publicly

Annual Action Plan
2019
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 2019.

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 2019 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.
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 is partnering in the regional Assessment of Fair Housing (AFH) for which Cook County is the lead agency and Enterprise will provide staffing and technical assistance. The City expects to have data and most of the conclusions of this AFH to inform the development of its 2020-2024 Consolidated Plan. If the AFH is not completed prior to the submission of the City’s new ConPlan, the City will review the final AFH when completed and amend its ConPlan as needed.

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, several rental projects have been approved that are subject to the IHO, resulting in the creation of 41 new rental units and a $2.4 million fee-in-lieu payment between 2018 and 2020. 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. As a result, the City put together a Subcommittee in 2018 to evaluate revisions to the IHO in order 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. Revisions to the IHO are expected to be approved in 2018, with an effective date of January 1, 2019. In addition, the mayor appointed a steering committee in 2018 to oversee the development of an affordable housing plan. It is anticipated that the process will take 12 months, and a draft plan will be completed in the fourth quarter of 2019. The City is currently evaluating and implementing 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 the city. The affordable housing plan will also help to prioritize funding and implementation of the various strategies currently being evaluated. The strategies being considered are listed below:

- 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 existing coach houses/accessory dwelling units (ADUs) to non-family member HHs. A registration and inspection process is currently being implemented.
• 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 than 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. 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 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 has developed 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 was 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.

Concerned about the advancing crisis of climate change, Evanston signed the U.S. Mayors Climate Protection Agreement in 2006, pledging to reduce greenhouse gas (GHG) emissions by 13% by 2012 relative to a 2005 baseline. That goal was achieved in mid-summer of 2013, not by mobilizing Evanston
residents to make their homes more energy efficient or to change their day-to-day behaviors, but rather through the City’s initiatives to reduce its own energy use and by the decision of voters and the City Council to embrace 100% renewable energy for Evanston residents and small businesses. The more ambitious goal of the Livability Plan is a 20% reduction in GHG emissions by 2016. This aligns with the GHG Mitigation objective in the STAR Community Rating System and is key to Evanston’s livability goals of healthy citizens and a healthier environment for all of Evanston. The plan was developed in collaboration between the City of Evanston Office of Sustainability and Sustain Evanston, a network of citizens and over 20 organizations that support initiatives and projects to improve the sustainability of Evanston. Strategies to achieve this goal include energy retrofits of 280 single-family homes each year, as well as multi-family housing and business/commercial retrofits. Energy Impact Illinois, a program offering low-cost home energy assessments and generous instant rebates to cover the cost of weatherization improvements, is a key tool to achieving this, but low and moderate income homeowners often lack the resources to participate in this and similar programs. Staff continues to work on a funding strategy to address this to improve the condition and affordability of Evanston’s housing stock.

**Actions planned to foster and maintain affordable housing**

Evanston continues to research new and alternative ways to create more affordable housing, including rental of accessory dwelling units, to expand affordable housing. The City also began working with the Metropolitan Tenants Organization (MTO) and Lawyers’ Committee for Better Housing (LCBH) in 2018 to strengthen landlord/tenant relations, particularly for low-income households with subsidies, and increase awareness of landlord-tenant rights and responsibilities. Additionally, the partnership with LCBH will provide low-income residents with legal assistance and representation in cases of evictions, retaliation, illegal lockouts, etc.

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 2018, City Council named expanding affordable housing options as one of its goals. Several strategies have been researched and discussed by City Council, such as the creation and rental of accessory dwelling units, zoning changes to allow for smaller lots, and the use of City-owned land for affordable housing development. In addition, City Council approved the creation of a Landlord Rehabilitation Assistance Program, rental of existing coach houses to non-family members, and amendments to the City’s Inclusionary Housing Ordinance. Furthermore, the mayor appointed a steering committee in 2018 to oversee the development of an affordable housing plan. The steering committee will work with the City’s Housing and Homelessness Commission to conduct outreach and solicit feedback on the plan from Evanston residents and stakeholders. It is anticipated that the process will take 12 months, and a draft plan will be completed in the fourth quarter of 2019. The plan will then be used to prioritize affordable housing strategies and funding.
**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. In an effort to reduce lead exposure for low/moderate income households, the City will launch a new program in 2019. The Lead Service Replacement program will fund the replacement of partial lead water service lines at owner occupied homes that meet current HUD income requirements. When the City replaces old water mains, the lead service line from the parkway to the home remains; lead exposure is a heightened concern when the pipe is disturbed. This project would remove the remaining portion of lead service lines and replace them with copper pipe. This service would be offered at locations where the City has already replaced the service from the main to the parkway.

**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 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 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 2019 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 bilingual 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.

Discussion:
Program Specific Requirements
AP-90 Program Specific Requirements – 91.220(l)(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

Annual Action Plan
2019

OMB Control No: 2506-0117 (exp. 06/30/2018)
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 2019; 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 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.
1. Include written standards for providing ESG assistance (may include as attachment)

Please see attached ESG Policies and Procedures for 2019. 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 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 advances, 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
Attachments
Citizen Participation Comments

6/8/2020 
CITY OF EVANSTON Mail - public comment on the Substantial Amendments to the Consolidated Plan and Action Plan for 2019

Sarah Flax <sflax@cityofevanston.org>

public comment on the Substantial Amendments to the Consolidated Plan and Action Plan for 2019

1 message

Betty Bogg <Bbogg@connect2home.org> 
To: "cdbg@cityofevanston.org" <cdbg@cityofevanston.org>

Mon, Jun 8, 2020 at 12:13 PM

The primary concern that Connections for the Homeless would like to raise related to the substantial amendments to the 2015 – 2019 Consolidated Plan and the 2019 Action Plan is that we are seeking transparency in how the new COVID-19-related funding will be spent. We can tell from the Action Plan what the primary projects are:

- CV-Public Services: to be funded by $664,194 in CDBG-CV money and $97,400 in CDBG and covering rent assistance, utilities assistance, food assistance, child care assistance, shelter operations, street outreach, case management, 25% of emergency costs not covered by FEMA.
- CV-Economic Development: to be funded with $200,000 in CDBG-CV funding and covering forgivable loans/grants to micro-enterprises, direct assistance to for-profit businesses, transition to digital marketing
- CV-Administration: to be funded with $216,048 in CDBG-CV money and covering planning, administration and compliance of CDBG-CV funded activities
- ESG-CV: to be funded with $546,424 in ESG-CV funding and $158,463 in ESG funding and covering outreach. Rapid Re-housing and Prevention activities will take place throughout Evanston. Shelter activities will take place at existing facilities, including Connections for the Homeless’ Hilda’s Place and the YWCA.

However, we cannot tell from the Action Plan how much of this funding is intended to reimburse the City for COVID-related expenses as opposed to funding non-profits who will continue the work of serving the City’s homeless population during the remainder of the COVID crisis and beyond. We believe that the CV funding should be directed to non-profits who are providing ongoing shelter and housing for people who would otherwise be homeless. This would include reimbursing the non-profits for the 25% of costs already incurred which are not reimbursable by FEMA, as the non-profits would use the reimbursements to provide additional shelter and support moving forward—something which the City would not do.

We ask that the City disclose the intended recipients of the money, if not the exact amounts, for each project, specifically where the City is going to be using the money for purposes that will not directly contribute to the future shelter and housing of homeless residents.

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BETTY A. BOGG

Executive Director

(she/her/hers)

https://mail.google.com/mail/u/0?ik=d1609b73c&view=pt&search=all&permthid=thread-f%3A1e689517436119568152%7Cmsg-f%3A1e689517439191... 1/2

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Annual Action Plan

2019

OMB Control No: 2506-0117 (exp. 06/30/2018)
Public comment request

1 message

Jessica Wingader 
Wed, Jun 3, 2020 at 11:03 AM

Bcc: bskrasny@gmail.com, hillary.presper@family-focus.org, mayeres@trilogyinc.org, mark.weiner@cjce.net, Adam Finlayson

From: Jessica Wingader <jwingader@cityofevanston.org>

City of Evanston

Jessica Wingader <jwingader@cityofevanston.org>

City of Evanston seeks public comment on the Substantive Amendments to the 2015-2019 Consolidated Plan, 2019 Action Plan and Citizen Public Participation Plan for CARES Activities

https://mail.google.com/mail/u/0?ik=noc6a062e9c4&view=p&search=all&permthid=thread-a%3A1-5701289195267003222%7Cnmsg-a%3A99020245321...
The 5 day comment period for the City of Evanston’s substantial amendments to the 2015-2019 Consolidated Plan, 2019 Action Plan, and Citizen Public Participation Plan is currently open and will close at 4PM on June 8, 2020. Comments may be submitted by email to cdbg@cityofevanston.org or during the virtual City Council meeting on June 8, 2020. All interested persons are encouraged to participate.

The City of Evanston is amending its Citizen Participation Plan, as allowed under the CARES Act and based on HUD’s recognition that the efforts to contain COVID-19 require limiting public gatherings used to obtain citizen participation, and the need to respond quickly to the growing spread and effects of COVID-19 while providing residents and stakeholders reasonable notice and opportunity to comment on the City’s substantial amendment to its 2019 Action Plan for CDBG-CV and ESG-CV funding from the CARES Act.

The substantial amendment to the Consolidated Plan and Action Plan documents may be viewed at: https://www.cityofevanston.org/government/departments/community-development/hud-consolidated-plan.

During the COVID-19 pandemic, Evanston City Council meetings have been modified based on Governor Pritzker’s order that waives some requirements of the Illinois Open Meetings Act to allow local governments and other public bodies to hold “remote” meetings to help control the spread of COVID-19.

Residents who wish to participate in live public comments during the virtual City Council should sign-up online the day of the City Council. Live public comments will be either by phone or by video-conference (via zoom). Online sign-up is available on this page: https://www.cityofevanston.org/government/city-clerk/public-comment-sign-up

Jessica Wingard
Grants & Compliance Specialist
Community Development
Morton Civic Center
City of Evanston
She, Her, Hers

2100 Ridge Ave. | Evanston, IL 60201 | 847-859-7889
jwingard@cityofevanston.org | cityofevanston.org

COVID-19 Face Covering Order
The City of Evanston has issued an Order requiring all persons working in or patronizing “essential businesses and operations,” as defined in the Governor’s Stay-at-Home Order, to wear cloth face coverings.

United States Census 2020

Evanston is counting on you!
Complete the 2020 U.S. Census at my2020census.gov.

Note: The contents of this electronic mail to/from any recipient hereto, any attachments hereto, and any associated metadata pertaining to this electronic mail, is subject to disclosure under the Illinois Freedom of Information Act, 5 ILCS 140/1 et. seq.

https://mail.google.com/mail/u/0?ik=a03b3f90c&view=pt&search=all&permthid=thread-a%3A-5701289195267003222%7Cmsg-a%3A-9020245321...
HUD Consolidated Plan

City of Evanston seeks public comment on the Substantial Amendments to the 2015-2019 Consolidated Plan, PY2019 CARES Act Substantial Amendment Action Plan and Citizen Participation Plan for CARES Act

The 5 day comment period for the City of Evanston’s substantial amendments to the 2015-2019 Consolidated Plan, 2019 Action Plan, and Citizen Public Participation Plan opens June 1 and closes June 8, 2020. Comments may be submitted by email to cdig@cityofevanston.org by 4:30 pm on June 8, 2020, or by telephone or video conference during the live public comment period of the June 8 virtual City Council meeting at 7 pm (or following the conclusion of the Planning & Development Committee meeting). All interested persons are encouraged to participate.

The City of Evanston is amending its Citizen Participation Plan, as allowed under the CARES Act and based on HUD’s recognition that the efforts to contain COVID-19 require limiting public gatherings used to obtain citizen participation, and the need to respond quickly to the growing spread and effects of COVID-19 while providing residents and stakeholders reasonable notice and opportunity to comment on the City’s substantial amendment to its 2019 Action Plan for CDBG-CV and ESG-CV funding from the CARES Act.

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2020-2024 Consolidated Plan and 2020 Action Plan

The City of Evanston’s 2020-2024 Consolidated Plan identifies and prioritizes housing, community and economic development needs and strategies, focusing primarily on the needs of low- and moderate-income residents. The Plan was approved by City Council on April 13, 2020 and has been submitted to the U.S. Department of Housing and Urban Development (HUD) as part of the funding process for Community Development Block Grant (CDBG), HOME Investment Partnership (HOME), and Emergency Solutions Grant (ESG) programs. The statutory goals of the Consolidated Plan are to provide decent housing, a suitable living environment and economic opportunities for low- and moderate-income residents. The 2020 Action Plan outlines how the City will use grant funds from HUD in 2020.

The 30-day comment period for the City’s Consolidated Plan and 2020 Action Plan is now closed; no comments were received. The public comment period began on Monday, November 18, 2019 and closed on Tuesday, December 17, 2019. The City of Evanston’s Housing & Community Development Act Committee held a public meeting to hear comment on the draft 2020-2024 Consolidated Plan and 2020 Action Plan on Tuesday, December 17, 2019, in City Council Chambers of the Morton Civic Center.

**2019 CAPER**

The City of Evanston’s 2019 Consolidated Annual Performance and Evaluation Report (CAPER) was approved by City Council on **Tuesday, March 17, 2020**. Prior to approval, the 2019 CAPER was open for public comment from Monday, March 2 through Tuesday, March 17, 2020. The 2019 CAPER discusses the City’s accomplishments during fiscal year 2019 in meeting its community development and housing goals using federal funds from the U.S. Department of Housing and Urban Development’s Community Development Block Grant (CDBG), HOME Investment Partnerships (HOME) and Emergency Solutions Grant (ESG) programs.

**City of Evanston 2015-2019 Consolidated Plan**

The City of Evanston’s 2015-2019 Consolidated Plan, including its Neighborhood Revitalization Strategy Area Plan and 2015 Action Plan, has been approved by the Chicago Field Office of the US Department of Housing and Urban Development.

**Prior Year Documents**

- 2019 Action Plan
- 2018 CAPER
- 2018 Action Plan
- 2017 CAPER
- 2017 Action Plan
- 2016 CAPER
- 2016 Action Plan
- 2015 CAPER

**2010 - 2014 Consolidated Plan**

- 2010-2014 Consolidated Plan
- 2014 Action Plan Updated with 2014 Grant Amounts
- 2013 Action Plan.pdf
- 2012 Action Plan
- 2011 Consolidated Annual Performance and Evaluation Report (CAPER)
- 06-30-11 CDBG Substantial Amendment Notice
- 2011 Action Plan FINAL
- 2010-2014 Consolidated Plan FINAL APPROVED

• 2009/2010 HUD Consolidated Annual Performance and Evaluation Report (CAPER)
• CDBG Target Area Map

CDBG-R Reporting

2012
• Q3 2012 CDBG-R Report
• Q2 2012 CDBG-R Report
• Q1 2012 CDBG-R Report

2011
• Q4 2011 CDBG-R Report
• Q3 2011 CDBG-R Report
• Q2 2011 CDBG-R Report
• Q1 2011 CDBG-R Report

2010
• Q4 2010 CDBG-R Report
• Q3 2010 CDBG-R Report
• Q2 2010 CDBG-R Report
• Q1 2010 CDBG-R Report

Other CDBG related Publications
• CDBG-R Plan Amendment
• Evanston CDBG-R Plan (Substantial Amendment to 2008 Action Plan)
• 2009 NSP2 Application

1817 Church Street
• 1993 RFP.pdf
• 2010 RFP-1817 Church Street Redevelopment.pdf
• 1817 Church bldg condition Feb 2011.pdf

HPRP Reporting
• OPR Q1 2012
• HPRP Q1 2012 federalreporting.gov report
News List

City Seeks Public Comment on 2019 Action Plan

Post Date: 10/10/2018 9:15 AM

The City of Evanston’s Housing & Community Development Act Committee will hold a public meeting to hear comment on the 2019 Action Plan on Tuesday, November 13, 2018 at 7 p.m. in Room 2402 of the Morton Civic Center, 2100 Ridge Ave. All interested persons are encouraged to attend.

The 2019 Action Plan outlines how the City’s estimated 2019 Community Development Block Grant (CDBG), Home Investment Partnership (HOME) and Emergency Solutions Grant (ESG) funds, along with program income and unspent CDBG funds from prior years, will be used to improve the quality of life primarily for low and moderate income Evanston residents. To submit questions relating to the draft Action Plan, email cdbg@cityofevanston.org or call 847-448-4381 (you may dial 311 if calling while in Evanston).

A draft of the 2019 Action Plan may be viewed beginning October 15, 2018 in Room 2401 of the Morton Civic Center or viewed online at cityofevanston.org/2019actionplan.

The 30-day comment period for the City’s 2019 Action Plan opens on Monday, October 15 and closes Tuesday, November 13, 2018. Comments may be submitted in person at the meeting on November 13 or in writing by 4 p.m. that day to Jessica Wengler, Community Development Dept., 2100 Ridge Ave., Room 3304, Evanston, IL 60201 or emailed to cdbg@cityofevanston.org.

The City of Evanston is committed to making information and public meetings accessible to persons with disabilities or limited English proficiency. For mobility or communications assistance, contact Facilities Management at 847-448-3966 (voice) or 847-328-8052 (TDD).

La ciudad de Evanston está obligada a hacer accesibles todas las reuniones públicas a las personas con impedimentos o quienes no hablan inglés. Si necesita asistencia para comunicarse o ampliarse contacte la Oficina de Administración del Centro al 847-448-3966 (voz) o 847-448-8052 (TDD).
CITY OF EVANSTON SEeks PUBLIC COMMENT ON
2019 ACTION PLAN

The City of Evanston’s Housing & Community Development Act Committee will hold a public meeting to hear comment on the 2019 Action Plan on Tuesday, November 13, 2018. All interested persons are encouraged to attend.

The 2019 Action Plan outlines how the City’s estimated 2019 CDBG, HOME, and ESF funds, along with program income and unspent CDBG funds from prior years, will be used to improve the quality of life primarily for low and moderate-income Evanston residents.

The 30-day comment period for the City’s 2019 Action Plan opens on Monday, October 15, and closes Tuesday, November 13, 2018.

Comments may be submitted in person at the meeting on November 13, or in writing by 4 p.m. that day to Jessica Wingate, Community Development Dept., 2000 Ridge Ave., Room 370A, Evanston, IL 60202 or emailed to cdbg@cityofevanston.org.

The 2019 Action Plan may be viewed beginning Oct. 15, 2018 in Room 3700 at the Morton Civic Center or online at www.cityofevanston.org/2019ActionPlan.

The City of Evanston is committed to making information and public meetings accessible to people with disabilities or limited English proficiency. For a disability or communications access assistance, contact Shelly Jeffries Management at 847-448-4311 (voice) or 847-329-6955 (TDD).

La ciudad de Evanston está obligada a hacer accesibles todas las reuniones públicas a las personas con impedimentos a quienes no hablan inglés. Si usted necesita asistencia con comunicarse o necesita contactar el Oficina de Administración del Centro al 847-448-4311 (voz) o 847-448-6052 (TDD).
Grantee Unique Appendices

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.

Updated October 2018
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. Additionally, funded programs and services provide equal access for individuals in accordance with their gender identity. 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 whose last permanent residence prior to becoming homeless was an Evanston address at which they resided for six or more months (exception may be made to this requirement for households fleeing domestic violence), or who have a child (children) enrolled in Dist. 65 or Dist. 202, or other Evanston based child care, or who are currently employed in Evanston

C. The household must have undergone at least an initial consultation and eligibility assessment with a case manager or other authorized representative who is responsible for determining eligibility and the type and level of assistance needed

D. Based on assessment at intake, household has likelihood of maintaining housing and becoming self-sustaining following the receipt of assistance estimated at 12 months, but could be for a shorter (3 – 6 month) period

E. Head(s) of household must agree to follow the case management plan developed working with the case manager

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 an Evanston resident of six months or more, or who have a child (children) enrolled in Dist. 65 or Dist. 202, or other Evanston based child care, or who are currently employed in Evanston

D. The household must have undergone at least an initial consultation and eligibility assessment with a case manager or other authorized representative who is responsible for determining eligibility and the type and level of assistance needed

E. Based on assessment at intake, household 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

Updated October 2018
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’ 18-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. The YWCA Evanston-North Shore provides shelter for up to 90 days. Hilda’s Place provides shelter for up to one year and serves an estimated 50 single adults; 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.

Updated October 2018
Discharge
Clients may be discharged for three reasons.
1. They have stayed 365 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

Updated October 2018
meeting, the monthly Prevention Committee and the SubCook Zero: 2018 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 compliance with HUD requirements, all funded programs participate in the coordinated entry process known as Entry Point. Entry Point is the Coordinated Entry System for Suburban Cook County Continuum of Care (CoC). The purpose of Entry Point is to ensure that all people experiencing homelessness have fair and equal access to housing, regardless of race, color, national origin, religion, gender, age, familial status, disability, actual or perceived sexual orientation, gender identity, or marital status. The intake process has been standardized and a by-name vulnerability list for the region, which is maintained by the Alliance as the Entry Point Lead Agency, has been employed to prioritize the most vulnerable for the most intensive housing interventions. This process is only used to match individuals to Permanent Supportive Housing. The City of Evanston continues to work with local partners to provide all other services to our at-risk population.

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 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. Individuals may not

**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:

*Updated October 2018*
• 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

Evanston’s ESG program can provide subsidies for up to one year, and are generally estimated at up to $25,200 for families with children and up to $17,000 for single adults or couples. The percent of subsidy paid decreases throughout the year as households move toward stability and are able to assume responsibility for paying full rent at the end of the year. This change was made based on in-market experience due to the following factors:
  1. Households have not been able to maintain their housing independently following six 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 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 twelve month period if a subsidy is still required to maintain housing and extension of funding may be approved by the Program Review Committee based on need and the availability of funding. No client will receive more than 24 months of assistance in a three-year period.

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.

Updated October 2018

Annual Action Plan 2019

OMB Control No: 2506-0117 (exp. 06/30/2018)
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.
## CITY OF EVANSTON
### UNEXPENDED CDBG FUNDS FROM PRIOR YEARS
FOR REALLOCATION IN FY 2019

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<th>Program Year</th>
<th>Project</th>
<th>Amount</th>
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<td>Ridgeville Park District/Brummel Park Play Circuit</td>
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<td>2016</td>
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**Total** $24,947.01
Grantee SF-424's and Certification(s)

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<th>Application for Federal Assistance SF-424</th>
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<tr>
<td>1. Type of Submission:</td>
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<tr>
<td>[ ] Preapplication</td>
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<tr>
<td>[X] Application</td>
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<td>[ ] Revision</td>
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<td>[ ] Other (Specify):</td>
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<td>2. Type of Application:</td>
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<td>[ ] Revision, select appropriate item(s):</td>
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<td>3. Date Received: 03/17/2020</td>
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<tr>
<td>4. Applicant Identifier: 88-8585670</td>
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<td>5. Federal Agency Identifier: 44172221</td>
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<td>6. State/Program Award Identifier: 87085763022</td>
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<td>7. State/Program Application Identifier:</td>
</tr>
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**B. APPLICANT INFORMATION:**

| 1. Legal Name: City of Evanston |
| 2. Employer/Taxpayer Identification Number (EIN/TIN): |
| 3. Organizational DUNS: |
| 4. Address: 1150 Ridge Avenue |
| 5. State: Illinois |
| 6. County/Parish: Evanston |
| 7. City: Evanston |
| 8. Zip/Postal Code: 60201-5716 |
| 9. Organizational Unit: Community Development |
| 10. Name and title of person to be contacted on matters involving this application: |
| First Name: Sarah |
| Last Name: |
| Title: Housing and Grants Manager |
| Telephone Number: 847-468-3884 |
| Fax Number: 847-468-0126 |
| Email: pflint@evanston.org |

Doc ID: 351a57e5a50e35b7d1c5970b4aee8ecbd6927102

Annual Action Plan 2019

OMB Control No: 2506-0117 (exp. 06/30/2018)
Application for Federal Assistance SF-424

[Fields filled out in the form include:]
- Type of Applicant 1: Select Applicant Type: [City or Township Government]
- Type of Applicant 2: Select Applicant Type: [Other (specify):]
- Name of Federal Agency: [Department of Housing and Urban Development]
- Catalog of Federal Domestic Assistance Number: [117619]
- Funding Opportunity Number: [“20C0147”]
- Title: [CDBG-CV]
- Description of Applicant’s Project: [Coronavirus Emergency Response CDBG-CV Grant to prevent, prepare for, and respond to coronavirus.]

Doc ID: 351a57e59b6035b7d1587b4aee8ecbd6927102
### Application for Federal Assistance SF-424

15. Congressional District Of:

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<th>Rural</th>
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Attach an additional list of Program/Project Congressional Districts if needed.

17. Proposed Project:

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<th>End Date</th>
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<td>10/31/2022</td>
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18. Estimated Funding ($):

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<tr>
<td>Applicant</td>
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<td>State</td>
<td>0.00</td>
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<tr>
<td>Local</td>
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<tr>
<td>Other</td>
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<tr>
<td>Program Voids</td>
<td>0.00</td>
</tr>
<tr>
<td><strong>TOTAL</strong></td>
<td>1,030,543.00</td>
</tr>
</tbody>
</table>

19. Is Application Subject To Review By State Under Executive Order 13272 Process?

- [ ] This application was made available to the State under the Executive Order 13272 Process for review on
- [ ] Program is subject to E.O. 13272 but has not been selected by the State for review
- [x] Program is not covered by E.O. 13272.

20. Is the Applicant Delegated On Any Federal Debt? (If "Yes," provide explanation in attachment.)

- [ ] Yes
- [x] No

If "Yes", provide explanation and attach.

21. "By signing this application, I certify (1) to the statements contained in the list of certifications** and (2) that the statements therein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (5 U.S.C. Code, Title 218, Section 183a)

- [x] I AGREE

** The list of certifications and assurances, or an Internet site where you may obtain this list, is contained in the attachment or agency specific instructions.

**Authorized Representatives:**

<table>
<thead>
<tr>
<th>Title</th>
<th>First Name</th>
<th>Last Name</th>
</tr>
</thead>
<tbody>
<tr>
<td>Mayor</td>
<td>Erika</td>
<td>Starlie</td>
</tr>
</tbody>
</table>

**Telephone Number:** 917-656-2526  
**Fax Number:** 917-656-2526

**Email:** erika.scarlett@boston.gov

**Signature of Authorized Representative:**

[Signature]

**Date Signed:** [05/30/2020]

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Doc ID: 351a57e5a50e35b7d1c5870b4aa9e8ecbd6927102

Annual Action Plan 2019  
95

OMB Control No: 2506-0117 (exp. 06/30/2018)
ASSURANCES - CONSTRUCTION PROGRAMS

PUBLIC REPORTING BURDEN FOR THE COLLECTION OF INFORMATION IS ESTIMATED TO AVERAGE 15 MINUTES PER RESPONSE, INCLUDING TIME FOR REVISING INSTRUCTIONS, SEARCHING EXISTING DATA SOURCES, GATHERING AND MAINTAINING THE DATA NEEDS, AND COMPLETING AND REVIEWING THE COLLECTION OF INFORMATION. SEND COMMENTS REGARDING THE BURDEN ESTIMATE OR ANY OTHER ASPECT OF THIS COLLECTION OF INFORMATION, INCLUDING SUGGESTIONS FOR REDUCTION OF THE BURDEN, TO THE OFFICE OF MANAGEMENT AND BUDGET. Paperwork Reduction Project (0490-0042), Washington, DC 20503.

PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.

NOTE: Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the Awarding Agency. Further, certain Federal assistance awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duly authorized representative of the applicant, I certify that the applicant:

1. Has the legal authority to apply for Federal assistance and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project costs) to ensure proper planning, management, and completion of projects described in this application.

2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, the right to examine all records, books, papers, or documents related to the assistance, and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.

3. Will not dispose of, modify the use of, or change the terms of the real property title or other interest in the site and facilities without permission and instructions from the awarding agency. Will record the Federal awarding agency directives and will include a covenant in the title of real property acquired in whole or in part with Federal assistance funds to assure non-discrimination during the useful life of the project.

4. Will comply with the requirements of the issuance and awarding agency with respect to the drafting, review and approval of construction plans and specifications.

5. Will provide and maintain competent and adequate engineering supervision at the construction site to ensure the complete work conforms with the approved plans and specifications and will furnish progress reports and such other information as may be required by the assistance awarding agency or State.

6. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.

7. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.

8. Will comply with the Intravenous Drug Use Prevention Act of 1970 (42 U.S.C. §672d-675) relating to prescribed standards for needle systems for programs funded under one of the 10 statutes or regulations specified in Appendix A of OPAAE Standards for a Methadone Treatment Program (5 C.F.R. 50, Support F).

9. Will comply with the Lead-Based Paint Renovation, Repair, and Painting Act (42 U.S.C. §6641 et seq.), which prohibits the use of lead-based paint in construction or rehabilitation of residential structures.

10. Will comply with all Federal statutes relating to non-discrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color, or national origin. (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1681 et seq., and 1595e1684), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. §774), which prohibits discrimination on the basis of handicap; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Drug Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-610), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§522 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §290 d-3 and 290 ee 3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VII of the Civil Rights Act of 1964 (42 U.S.C. §2000 et seq.), as amended, relating to nondiscrimination in the sale, rental, or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.

[Signature]

Authorized for Legal Reproduction

Standard Form 440 (Rev. 7-87)

Prepared by OMB Circular A-102

Doc ID: 351a57e5a50e35b7d1c567b04aae8ecbd6927102

Annual Action Plan

2019

OMB Control No: 2506-0117 (exp. 06/30/2018)
11. Will comply, or has already complied, with the requirements of Titles I and II of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-640) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal and federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchase.

12. Will comply with the provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.


14. Will comply with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to purchase flood insurance if the total cost of insured construction and acquisition is $10,000 or more.

15. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11998; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) Implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7475(a) et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (42 U.S.C. §§300f); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).


18. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1984 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."

19. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.

20. Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. §1715) which prohibits grant activity recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect; (2) Procuring a commercial sex act during the period of time that the award is in effect; or (3) Using forced labor in the performance of the award or subawards under the award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL

Erika Starlic

APPLICANT ORGANIZATION
City of Florence

DATE SUBMITTED
6/4/1270

SF-4240 (Rev. 7-07) Back

Doc ID: 351a57e5a50e35b7d1c5870b4ae8ecbd6927102

Annual Action Plan 2019

OMB Control No: 2506-0117 (exp. 06/30/2018)
ASSURANCES - NON-CONSTRUCTION PROGRAMS

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimates or any other aspect of this collection of information including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (2506-0117), Washington, DC 20503.

PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.

NOTE: Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the awarding agency. Further, certain Federal awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duly authorized representative of the applicant, I certify that the applicant:

1. Has the legal authority to apply for Federal assistance and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project cost) to ensure proper planning, management, and completion of the project described in this application.

2. Will give the awarding agency, the Comptroller General of the United States, and, if appropriate, the State, through any authorized representative, access to and the right to examine all records, books, papers, or documents related to the award, and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.

3. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.

4. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.

5. Will comply with the Interagency Personnel Act of 1970 (42 U.S.C. §§ 4723 and 4763) relating to prescribed standards for merit systems for programs funded under any of the 13 statutes or regulations specified in Appendix A of OPPE Standards for a Merit System of Personnel Administration (3 C.F.R. 500, Subpart F).

6. Will comply with all Federal statutes relating to nondiscrimination. These statutes are not limited to:
   (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§ 1681-1688), and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 604 of the Rehabilitation Act of 1973, as amended (22 U.S.C. § 791), which prohibits discrimination on the basis of handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§ 6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse and Treatment Act of 1972 (P.L. 92-255), as amended, relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1977 (P.L. 95-609), as amended, relating to nondiscrimination on the basis of alcoholism or alcoholism (g) §§ 3522 and 527 of the Public Health Services Act of 1912 (42 U.S.C. §§ 299 and 290 ee-3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VII of the Civil Rights Act of 1964 (42 U.S.C. §§ 2000-2000 ee), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.

7. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-694) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal or federally assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.

8. Will comply, as applicable, with provisions of the Walsh Act (5 U.S.C. §§ 501-508 and 7321-7322) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.

10. Will comply, if applicable, with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-393) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is $10,000 or more.

11. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) authorization of violating facilities pursuant to EO 11736; (c) protection of waterfowl pursuant to EO 11860; (d) protection of habitat in accordance with EO 11896; (e) assurance of site consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); and, (f) conformance of Federal actions to the National Environmental Policy Act under Section 17(b) of the Clean Air Act of 1963, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).


14. Will comply with P.L. 93-393 regarding the protection of human subjects involved in research, development, and related activities supported by this award of assistance.

15. Will comply with the Laboratory Animal Welfare Act of 1966 (P.L. 89-544, as amended, 7 U.S.C. §§2131 et seq.) pertaining to the care, handling, and treatment of warm-blooded animals held for research, teaching, or other activities supported by this award of assistance.

16. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4901 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.

17. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Auditors of States, Local Governments, and Non-Profit Organizations."

18. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.

19. Will comply with the requirements of Section 106(c) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. §7104) which prohibits grant award recipients or sub-recipients from (1) engaging in severe forms of trafficking in persons during the period of time that the award is in effect; (2) procuring a commercial sex act during the period of time that the award is in effect; or (3) using forced labor in the performance of the award or subawards under the award.
**Application for Federal Assistance SF-424**

9. Type of Applicant 1. Select Applicant Type:
   - City or Township Government

Type of Applicant 2. Select Applicant Type:

Type of Applicant 3. Select Applicant Type:

* Other (specify):

10. Name of Federal Agency:
    - Department of Housing and Urban Development

11. Catalog of Federal Domestic Assistance Number:
    - 14.221

12. Funding Opportunity Number:
    - E20FDH70012

13. Competition Identification Number:

Title:

14. Areas Affected by Project (Cities, Counties, States, etc.):

15. Descriptive Title of Applicant's Project:
   - City of Avondale ES&CV Program to prevent, prepare for, and respond to disasters.

Attach supporting documents as specified in agency instructions

| Add Attachments | Delete Attachments | View Attachments |
Application for Federal Assistance SF-424

16. Congressional District Of:
   a. Applicant [IL-9th]  b. Program/Project [IL-9th]

Attach an additional 1st of Program/Project Congressional District if needed.

17. Proposed Project:
   a. Start Date: 07/24/2023  b. End Date: 09/30/2023

18. Estimated Funding ($):
   a. Federal [956,311.40]
   b. Applicant [3.00]
   c. State [0.00]
   d. Local [0.00]
   e. Other [0.00]
   f. Program Income [0.00]
   g. TOTAL [956,314.40]

19. Is Application Subject to Review by State Under Executive Order 12372 Process?
   a. This application was made available to the State under the Executive Order 12372 Process for review on
   b. Program is subject to E.O. 12372 but has not been selected by the State for review.
   ☑ c. Program is not covered by E.O. 12372.

   ☑ Yes  ☐ No

If "Yes," provide explanation and attach

21. By signing this application, I certify that the statements contained in this list of certifications and the statements contained in the list of certifications are true, complete and accurate to the best of my knowledge. I also provide the required assurances and agree to comply with any outstanding terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 21, Section 1601).

☐ I AGREE

☑ The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

Authorized Representative:
Prefix: In.  First Name: [Jr.]
Middle Name: [Mr.]
Last Name: [Rodlie]
Suffix:
Title: [Interim City Manager]
*Telephone Number: [847-865-2525]
Fax Number:
*Email: [krodelie@cityofescondido.org]
*Signature of Authorized Representative: [Signature]
*Date Signed: [7-14-20]

Annual Action Plan 2019

OMB Control No: 2506-0117 (exp. 06/30/2018)
11. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-641) which provide for fair and equitable treatment of persons displaced as a result of Federal and federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.

12. Will comply with the provisions of the Hatch Act (5 U.S.C. §§1501-1518 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.


14. Will comply with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-235) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is $10,000 or more.

15. Will comply with environmental standards which may be prescribed pursuant to the following: (a) construction activities; (b) wetland protection; (c) endangered species; (d) hazardous materials; (e) surface water quality; (f) air quality; (g) toxic substances; (h) noise emissions; and (i) historic properties.

16. Will comply with the requirements of Section 166(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant or contract recipients from engaging in severe acts of trafficking in persons during the period of time that the award is in effect or (2) imposing a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

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**Signature of Authorized Certifying Official**

Erika Storlie

**Applicant Organization**

City of Evanston

**Date Submitted**

6/9/2020

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Annual Action Plan
2019

OMB Control No: 2506-0117 (exp. 06/30/2018)
ASSURANCES - NON-CONSTRUCTION PROGRAMS

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As the duly authorized representative of the applicant, I certify that the applicant:

1. Has the legal authority to apply for Federal assistance and the institutional, managerial, and financial capability (including funds sufficient to pay the non-Federal share of project cost) to ensure proper planning, management and completion of the project described in this application.

2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, through any authorized representative, access to and the right to examine all records, books, papers, or documents related to the award; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.

3. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.

4. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.

5. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§1728-1763) relating to prescribed standards for intergovernmental personnel services, and all applicable Federal statutes and regulations related to personnel administration, and the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (PL. 91-692) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal or federally-assisted programs.

6. Will comply with all Federal statutes relating to nondiscrimination. These include, but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (42 U.S.C. §§2000a et seq.), which prohibits discrimination on the basis of race, color, or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§2000a et seq.), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. §794), which prohibits discrimination on the basis of handicap; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-257), as amended, relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-350), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§503 and 504 of the Rehabilitation Act of 1973 (42 U.S.C. §§2951 et seq.), as amended, relating to nondiscrimination of disabled persons; and (i) the requirements of any other Federal statute that may apply.

7. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-692) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal or federally-assisted programs. These requirements apply to all interests in real property acquired for public purposes regardless of Federal participation in projects.

8. Will comply, as applicable, with provisions of the Hech Act (§§1901-1904 and 7324-7329) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.

10. Will comply, if applicable, with flood insurance purchase requirements of Section 102(s) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is $10,000 or more.

11. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violators pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11985; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (33 U.S.C. §§401 et seq.); (f) conformity of Federal actions to State Clean Air Implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).


14. Will comply with P.L. 93-348 regarding the protection of human subjects involved in research, development, and related activities supported by this award of assistance.

15. Will comply with the Laboratory Animal Welfare Act of 1966 (P.L. 89-544, as amended, 7 U.S.C. §§2131 et seq.) pertaining to the care, handling, and treatment of warm-blooded animals held for research, teaching, or other activities supported by this award of assistance.

16. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§699 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residential structures.

17. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1981 and OMB Circular No. A-123, "Audit of States, Local Governments, and Non-Profit Organizations."

18. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.

19. Will comply with the requirements of Section 108(a) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or sub-recipient from (1) engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) engaging in a commercial sex act during the period of time that the award is in effect or (3) using forced labor in the performance of the award or subawards under the award.

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<tr>
<th>SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL</th>
<th>TITLE</th>
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<tr>
<td>Erika Starke</td>
<td>Interim City Manager</td>
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<th>APPLICANT ORGANIZATION</th>
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<td>City of Evanston</td>
<td>6/9/2020</td>
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CERTIFICATIONS

In accordance with the applicable statutes and the regulations governing the consolidated plan regulations, the jurisdiction certifies that:

Affirmatively Further Fair Housing — The jurisdiction will affirmatively further fair housing.

Uniform Relocation Act and Anti-displacement and Relocation Plan — It will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, (42 U.S.C. 4601-4655) and implementing regulations at 49 CFR Part 24. It has in effect and is following a residential anti-displacement and relocation assistance plan required under 24 CFR Part 24 in connection with any activity assisted with funding under the Community Development Block Grant or HOME programs.

Anti-Lobbying — To the best of the jurisdiction’s knowledge and belief:

1. No Federal appropriated funds have been paid or will be paid, by or on behalf of it, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan or cooperative agreement;

2. If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, it will complete and submit Standard Form LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions; and

3. It will require that the language of paragraph 1 and 2 of this anti-lobbying certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly.

Authority of Jurisdiction — The consolidated plan is authorized under State and local law (as applicable) and the jurisdiction possesses the legal authority to carry out the programs for which it is seeking funding, in accordance with applicable HUD regulations.

Consistency with plan — The housing activities to be undertaken with Community Development Block Grant, HOME, Emergency Solutions Grant, and Housing Opportunities for Persons With AIDS funds are consistent with the strategic plan in the jurisdiction's consolidated plan.

Section 3 — It will comply with section 3 of the Housing and Urban Development Act of 1968 (13 U.S.C. 170a) and implementing regulations at 24 CFR Part 135.

[Signature]
Signature of Authorized Official

[Title]
Interim City Manager

[Date]
6/9/2020

Doc ID: 351a57e5a50e35b7dc5870b4ae8ecbd6927102

Annual Action Plan
2019

OMB Control No: 2506-0117 (exp. 06/30/2018)
Specific Community Development Block Grant Certifications

The Entitlement Community certifies that:

Citizen Participation — It is in full compliance and following a detailed citizen participation plan that satisfies the requirements of 14 CFR 91.105.

Community Development Plan — Its consolidated plan identifies community development and housing needs and specifies both short-term and long-term community development objectives that have been developed in accordance with the primary objective of the CDBG program (i.e., the development of viable urban communities by providing decent housing and expanding economic opportunities, primarily for persons of low and moderate income) and requirements of 24 CFR Parts 91 and 570.

Following a Plan — It is following a current consolidated plan that has been approved by HUD.

Use of Funds — It has complied with the following criteria:

1. Maximum Feasible Priority. With respect to activities assisted with CDBG funds, it has developed its Action Plan so as to give maximum feasible priority to activities which benefit low- and moderate-income families or aid in the prevention or elimination of slums or blight. The Action Plan may also include CDBG-assisted activities which the grantee certifies are designed to meet other community development needs having particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community, and other financial resources are not available (see Optional CDBG Certification).

2. Overall Benefit. The aggregate use of CDBG funds, including Section 108 guaranteed loans, during program year(s) [a period specified by the grantee of one, two, or three consecutive program years], shall principally benefit persons of low- and moderate income in a manner that ensures that at least 70 percent of the amount is expended for activities that benefit such persons during the designated period.

3. Special Assessments. It will not attempt to recover any capital costs of public improvements assisted with CDBG funds, including Section 108 loan guaranteed funds, by assessing any amount against properties owned and occupied by persons of low and moderate income, including any fee charged or assessment made as a condition of obtaining access to such public improvements.

However, if CDBG funds are used to pay the proportion of a fee or assessment that relates to the capital costs of public improvements (assisted in part with CDBG funds) financed from other revenue sources, an assessment or charge may be made against the property with respect to the public improvements financed by a source other than CDBG funds.

In addition, in the case of properties owned and occupied by moderate-income (not low-income) families, an assessment or charge may be made against the property for public improvements financed by a source other than CDBG funds if the jurisdiction certifies that it lacks CDBG funds to cover the assessment.

Excessive Force — It has adopted and is enforcing:

1. A policy prohibiting the use of excessive force by law enforcement agencies within its jurisdiction against any individuals engaged in non-violent civil rights demonstrations; and

2. A policy of enforcing applicable State and local laws against physically barring entrance to or exit from a facility or location which is the subject of such non-violent civil rights demonstrations within its jurisdiction.
Compliance with Anti-Discrimination laws -- The grant will be conducted and administered in conformity with Title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d) and the Fair Housing Act (42 U.S.C. 3601-3619) and implementing regulations.

Lead-Based Paint -- Its activities concerning lead-based paint will comply with the requirements of 24 CFR Part 35, Subparts A, B, I, K and R.

Compliance with Laws -- It will comply with applicable laws.

Erika Starlie  
Signature of Authorized Official  
[2/9/2020]  
[Date]

Interim City Manager  
[Title]
OPTIONAL. Community Development Block Grant Certification

Submit the following certification only when one or more of the activities in the action plan are designed to meet other community development needs having particular urgency as specified in 24 CFR 570.50(c).

The grantee hereby certifies that the Annual Plan includes one or more specifically identified CDBG-assisted activities which are designed to meet other community development needs having particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community and other financial resources are not available to meet such needs.

Erika Starlic
Signature of Authorized Official

[Signature]

Date

Title

Interim City Manager

Doc ID: 351a57e5a50e35b7d1c5870b4aaa8ecbd6927102
INTERIM ESG-CV Certifications (NON-STATE)

The Emergency Solutions Grants Program Recipient certifies that:

Major rehabilitation/conversion – If an emergency shelter's rehabilitation costs exceed 75 percent of the value of the building before rehabilitation, the jurisdiction will maintain the building as a shelter for homeless individuals and families for a minimum of 10 years after the date the building is first occupied by a homeless individual or family after the completed rehabilitation. If the cost to convert a building into an emergency shelter exceeds 75 percent of the value of the building after conversion, the jurisdiction will maintain the building as a shelter for homeless individuals and families for a minimum of 10 years after the date the building is first occupied by a homeless individual or family after the completed conversion. In all other cases where ESG funds are used for renovation, the jurisdiction will maintain the building as a shelter for homeless individuals and families for a minimum of 3 years after the date the building is first occupied by a homeless individual or family after the completed renovation.

EXCEPTION: In accordance with the CARES Act, the certifications in this paragraph do not apply with respect to CARES Act funding that is used to provide temporary emergency shelters (through leasing of existing property, temporary structures, or other means) to prevent, prepare for, and respond to coronavirus.

Essential Services and Operating Costs – In the case of assistance involving shelter operations or essential services related to street outreach or emergency shelter, the jurisdiction will provide services or shelter to homeless individuals and families for the period during which the ESG assistance is provided, without regard to a particular site or structure, so long the jurisdiction serves the same type of persons (e.g., families with children, unaccompanied youth, disabled individuals, or victims of domestic violence) or persons in the same geographic area.

EXCEPTION: In accordance with the CARES Act, the certification in this paragraph does not apply with respect to CARES Act funding that is used to provide temporary emergency shelters (through leasing of existing property, temporary structures, or other means) to prevent, prepare for, and respond to coronavirus.

Renovation – Any renovation carried out with ESG assistance shall be sufficient to ensure that the building involved is safe and sanitary.

Supportive Services – The jurisdiction will assist homeless individuals in obtaining permanent housing, appropriate supportive services (including medical and mental health treatment, victim services, counseling, supervision, and other services essential for achieving independent living), and other Federal State, local, and private assistance available for such individuals.

Matching Funds – The jurisdiction will obtain matching amounts required under 24 CFR 576.20.

Confidentiality – The jurisdiction has established and is implementing procedures to ensure the confidentiality of records pertaining to any individual provided family violence prevention or treatment services under any project assisted under the ESG program, including protection against the release of the address or location of any family violence shelter project, except with
the written authorization of the person responsible for the operation of that shelter.

**Homeless Persons Involvement** — To the maximum extent practicable, the jurisdiction will involve, through employment, volunteer services, or otherwise, homeless individuals and families in constructing, renovating, maintaining, and operating facilities assisted under the ESG program, in providing services assisted under the ESG program, and in providing services for occupants of facilities assisted under the program.

**Consolidated Plan** — All activities the jurisdiction undertakes with assistance under ESG are consistent with the jurisdiction’s consolidated plan.

**Discharge Policy** — The jurisdiction will establish and implement, to the maximum extent practicable and where appropriate policies and protocols for the discharge of persons from publicly funded institutions or systems of care (such as health care facilities, mental health facilities, foster care or other youth facilities, or correction programs and institutions) in order to prevent this discharge from immediately resulting in homelessness for these persons.

---

**Erika Stadie**  
Signature/Authorized Official

---

**Interim City Manager**

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**6/9/2020**  
Date
APPENDIX TO CERTIFICATIONS

INSTRUCTIONS CONCERNING LOBBYING CERTIFICATION:

Lobbying Certification
This certification is a material representation of fact upon which reliance was placed when this transaction
was made or entered into. Submission of this certification is a prerequisite for making or entering into this
transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required
certification shall be subject to a civil penalty of not less than $10,000 and not more than $100,000 for
each such failure.
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**Document History**

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**Annual Action Plan**

2019
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<td><strong>f. Name and contact information of person to be contacted on matters involving this application:</strong></td>
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**Annual Action Plan 2019**

OMB Control No: 2506-0117 (exp. 06/30/2018)
### Application for Federal Assistance SF-424

**6. Type of Applicant 1: Select Applicant Type:**
- City or Town/Senior Government

**Type of Applicant 2: Select Applicant Type:**

**Type of Applicant 3: Select Applicant Type:**

*NOTE (specify):*

**18. Name of Federal Agency:**
- Department of Housing and Urban Development

**11. Catalog of Federal Domestic Assistance Number:**
- 24.213

**CFDA Title:**
- Community Development Block Grant/Entitlement Grant

**12. Funding Opportunity Number:**
- CZH17P0012

**Title:**
- Community Development Block Grant

**13. Competition Identification Number:**

**Title:**

**14. Areas Affected by Project (Cities, Counties, States, etc.):**

**15. Descriptive Title of Applicant's Project:**
- City of Evanston 2019 Community Development Block Grant Program

*Attach supporting documents as specified in agency instructions.*
### Application for Federal Assistance SF-424

**16. Congressional Districts:***
- *a* Applicant: IL-9th
- *b* Program/Project: IL-9th

Attach an additional list of Program/Project Congressional Districts if needed.

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<td><em>b</em> End Date: 12/31/2018</td>
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<td>d. Local: 0.00</td>
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<td>e. Other: 910,986.83</td>
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<td>f. Program Income: 131,657.62</td>
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<tr>
<td>g. TOTAL: 2,845,072.45</td>
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**19. Is Application Subject to Review By State Under Executive Order 12372 Process?**

- [ ] This application was made available to the State under the Executive Order 12372 Process for review.
- [ ] Program is subject to E.O. 12372 but has not been reviewed by the State for review.
- [x] Program is not covered by E.O. 12372.

**20. Is the Applicant Delinquent on Any Federal Debt?**

[ ] Yes [ ] No

If "Yes," provide explanation in attachment.

| 21. By signing this application, I certify (1) to the statements contained in the list of certifications and (2) that the statements herein are true, complete, and correct to the best of my knowledge. I also provide the required assurances and agree to comply with any resulting terms.
| [ ] I AGREE

**The list of certifications and assurances, or an Internet site where you may obtain this list, is contained in the announcement or agency specific instructions.**

**Authorized Representative:**

- Prefix: Mr.
- First Name: Sally
- Middle Name: 
- Last Name: Beiersdorf
- Suffix: 
- Title: City Manager
- Telephone Number: EXT-800-2031
- Fax Number: 
- Email: city.of.westchicago@cityofwestchicago.org

**Signature of Authorized Representative:** [Signature]

**Date Signed:** 5-19-19

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**Annual Action Plan**

2019
ASSURANCES - CONSTRUCTION PROGRAMS

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (1148-0042), Washington, DC 20503.

PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.

NOTE: Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the Awarding Agency. Further, certain Federal assistance awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duly authorized representative of the applicant, I certify that the applicant:

1. Has the legal authority to apply for Federal assistance, and the institutional, managerial, and financial capability (including funds sufficient to pay the non-Federal share of project costs) to ensure proper planning, management, and completion of project described in this application.

2. Will give the awarding agency, the Comptroller General of the United States, and, if appropriate, the State, the right to examine all records, books, papers, or documents related to the assistance; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.

3. Will not dispose of, modify the use of, or change the terms of the real property title or other interest in the site and facilities without permission and instructions from the awarding agency. Will record the Federal awarding agency directives and will include a covenant in the title of real property acquired in whole or in part with Federal assistance funds to assure non-discrimination during the useful life of the project.

4. Will comply with the requirements of the assistance awarding agency with regard to the drafting, review, and approval of construction plans and specifications.

5. Will provide and maintain competent and adequate engineering supervision at the construction site to assure that the complete work conforms with the approved plans and specifications and will furnish progressive reports on work in progress and such other information as may be required by the assistance awarding agency or State.

6. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.

7. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.

8. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§6539-753b), relating to prescribed standards of merit systems for programs funded under one of the 12 statutes or regulations specified in Appendix A of OMB’s Standards for a Merit System of Personnel Administration (5 C.F.R. 500, Subpart F).

9. Will comply with the Lead-Based Paint Poisoning Prevention Act of 1978 (42 U.S.C. §§4828b) et seq., which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.

10. Will comply with all Federal statutes relating to nondiscrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1181, 1190, and 1153-1158), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. §794), which prohibits discrimination on the basis of handicap; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6117), which prohibits discrimination on the basis of age, (e) the Drug Abuse Office and Treatment Act of 1977, P.L. 95-225, as amended, relating to non-discrimination on the basis of drug abuse, (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1976 (P.L. 94-401), as amended, relating to nondiscrimination on the basis of alcohol or alcoholism; (g) §§823 and 577 of the Public Health Service Act of 1912 (42 U.S.C. §§290 d-1 and 290 ee-3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VII of the Civil Rights Act of 1964 (42 U.S.C. §§2000 e et seq.), as amended, relating to nondiscrimination in the sale, rental, or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application of Federal assistance is being made; and (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.

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Prepared by CIAA Circular A-182

Annual Action Plan
2019

OMB Control No: 2506-0117 (exp. 06/30/2018)
11. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-645) which provide for fair and equitable treatment of property owners whose property is acquired as a result of Federal and federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.

12. Will comply with the provisions of the Hatch Act (5 U.S.C. §55101-109 and 7324-7332) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.


14. Will comply with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-354) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is $10,000 or more.

15. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11988; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved Sisita management program; (f) conformity of Federal actions to State (Clean Air) implementation Plans under Section 176(c) of the Clean Air Act of 1966, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).


17. Will assist the awarding agency in ensuring compliance with Section 130 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), ED 11599 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (18 U.S.C. §§409a-1 et seq.)

18. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1984 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."

19. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.

20. Will comply with the requirements of Section 106(g) of the Treadwel Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or sub-recipient from (1) Engaging in severe forms of intimidating in persons during the period of time that the award is in effect (2) Procurers a commercial sex act during the period of time that the award is in effect or (3) Using force in the performance of the award or subawards under the award.
ASSURANCES - NON-CONSTRUCTION PROGRAMS

Public reporting burden for this collection of information is estimated to average 16 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of the collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0948-0040), Washington, DC 20503.

PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.

NOTE: Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the awarding agency. Further, certain Federal awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duly authorized representative of the applicant, I certify that the applicant:

1. Has the legal authority to apply for Federal assistance and the institutional, managerial, and financial capability (including funds sufficient to pay the non-Federal share of project costs) to assure proper planning, management and completion of the project described in this application.

2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, through any authorized representative, access to and the right to examine all records, books, papers, or documents related to the award; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.

3. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest or personal gain.

4. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.

5. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4703) relating to prescribed standards for merit systems personnel in programs funded under one of the 18 statutes or regulations specified in Appendix A of OMB's Standards for a Merit System of Personnel Administration (5 C.F.R. 902, Subpart F).

6. Will comply with all Federal statutes relating to nondiscrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color, or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1091-1083, and 1085-1096); which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. §794); which prohibits discrimination on the basis of handicap; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107); which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended, relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-545), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§5323 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§200 dd-3 and 200 ee-5), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1965 (42 U.S.C. §§3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and, (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.

7. Will comply, or has already complied, with the requirements of Title II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal or federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.

8. Will comply, as applicable, with provisions of the Health Act (5 U.S.C. §§1591-1599 and 7004-7238) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.

OMB Control No: 2506-0117 (exp. 06/30/2018)

10. Will comply, if applicable, with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 83-234) which requires recipients to a special flood hazard area to participate in the program and to purchase flood insurance if this total cost of insurance and acquisition is $10,009 or more.

11. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-156) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11988; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved state management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) Implementation Plans under Section 176(c) of the Clean Air Act of 1990, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-522); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).


14. Will comply with P.L. 93-348 regarding the protection of human subjects involved in research, development, and related activities supported by this award of assistance.

15. Will comply with the Laboratory Animal Welfare Act of 1966 (P.L. 89-544, as amended, 7 U.S.C. §§2131 et seq.) pertaining to the care, handling, and treatment of warm blooded animals held for research, teaching, or other activities supported by this award of assistance.

16. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of resistance structures.

17. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1981 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."

18. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.

19. Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or sub-recipients from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL

Wally Bowers

APPLICANT ORGANIZATION

City of Evansville

DATE SUBMITTED

5/21/19

OMB Control No: 2506-0117 (exp. 06/30/2018)

Annual Action Plan

2019

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### Application for Federal Assistance SF-424

**9. Type of Applicant 1: Select Applicant Type:**
- City or Township Government

**10. Name of Federal Agency:**
- Department of Housing and Urban Development

**11. Catalog of Federal Domestic Assistance Number:**
- 24.519

**12. Funding Opportunity Number:**
- H13APL70218

**13. Competition Identification Number:**

**14. Areas Affected by Project (Cities, Counties, States, etc.):**

**15. Descriptive Title of Applicant’s Project:**
- City of Zephyrhills 2019 OMB Investment Partnership Program

[Attach supporting documentation as specified in agency instructions.]
Annual Action Plan
2019

OMB Control No: 2506-0117 (exp. 06/30/2018)
Annual Action Plan
2019

Please do not return your completed form to the Office of Management and Budget. Send it to the address provided by the sponsoring agency.
11. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-946) which provides for fair and equitable treatment of property acquired as a result of Federal and federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.

12. Will comply with the provisions of the Hatch Act (5 U.S.C. §1591-1595 and 7328-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.


14. Will comply with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-117) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is $10,000 or more.

15. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of waiving provisions pursuant to EO 11792; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplain in accordance with EO 11988; (e) assurance of project consistency with the approved land management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) implementation plans under Section 176(c) of the Clean Air Act of 1965, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).


18. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1984 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."

19. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.

20. Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. §7106) which prohibits grant award recipients or sub-recipients from: (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect; (2) Procuring a commercial sex act during the period of time that the award is in effect; or (3) Using forced labor in the performance of the award or subawards under the award.

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<tr>
<td>[Signature]</td>
<td>City Manager</td>
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Annual Action Plan 2019

OMB Control No: 2506-0117 (exp. 06/30/2018)
Assurances - Non-Construction Programs

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of the collection of information, including suggestions for reducing the burden, to the Office of Management and Budget: Paperwork Reduction Project (OMB No. 2681-0040), Washington, DC 20503.

Please do not return your completed form to the Office of Management and Budget. Send it to the address provided by the sponsoring agency.

NOTE: Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the funding agency. Further, certain Federal auditors may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duly authorized representative of the applicant, I certify that the applicant:

1. Has the legal authority to apply for Federal assistance and the institutional, managerial, and financial capability (including funds sufficient to pay the non-Federal share of project cost) to ensure proper planning, management, and completion of the project described in this application.

2. Will give the awarding agency, the Comptroller General of the United States, and, if appropriate, the State, through any authorized representative, access to and the right to examine all records, books, papers, or documents related to the award; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.

3. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or implies the appearance of personal or organizational conflict of interest, or personal gain.

4. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.

5. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§1628-1676) relating to prescribed standards for intergovernmental personnel for programs funded under some of the 18 statutes or regulations specified in Appendix A of OMB’s Standards for a Merit System of Personnel Administration (5 C.F.R. Part 900, Subpart F).

6. Will comply with all Federal statutes relating to nondiscrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (42 U.S.C. §§2000d-1072) which prohibits discrimination on the basis of race, color, or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1681-1683, and 1685-1689), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation

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10. Will comply, if applicable, with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-334) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is $10,000 or more.

11. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11914; (b) notification of violating facilities pursuant to EO 11700; (c) protection of wetlands pursuant to EO 11900; (d) evaluation of flood hazards in flood plains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) Implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).


13. Will assist the awarding agency in assuring compliance with Section 103 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470); EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq.).

14. Will comply with P.L. 83-348 regarding the protection of human subjects involved in research, development, and related activities supported by this award of assistance.

15. Will comply with the Laboratory Animal Welfare Act of 1966 (P.L. 89-544, as amended, 7 U.S.C. §§2141 et seq.) pertaining to the care, handling, and treatment of warm blooded animals held for research, teaching, or other activities supported by this award of assistance.

16. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.

17. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1988 and OMB Circular No. A-133, “Audits of States, Local Governments, and Non-Profit Organizations.”

18. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.

19. Will comply with the requirements of Section 108(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. §7104) which prohibits grant award recipients or a sub-recipient from: (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect; (2) Procuring a commercial sex act during the period of time that the award is in effect; or (3) Using forced labor in the performance of the award or subaward under the award.

Signature of Authorized Certifying Official

Title

Applicant Organization

Date Submitted

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2019

OMB Control No: 2506-0117 (exp. 06/30/2018)
### Application for Federal Assistance SF-424

<table>
<thead>
<tr>
<th>Field</th>
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<tbody>
<tr>
<td>1. Type of Submission</td>
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<td>2. Type of Assistance</td>
<td>New</td>
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<tr>
<td>3. Date Received</td>
<td>01/12/2019</td>
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<tr>
<td>4. Address</td>
<td>1108 Filer Avenue, Evanston, IL, USA</td>
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<td>5. Legal Name</td>
<td>City of Evanston</td>
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<tr>
<td>6. Organizational Unit</td>
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<tr>
<td>7. Employee/Taxpayer Identification Number (EIN/TIN)</td>
<td>36-6983876</td>
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<td>8. Telephone Number</td>
<td>847-416-8664</td>
</tr>
<tr>
<td>9. Email</td>
<td><a href="mailto:afail@cityofevanston.org">afail@cityofevanston.org</a></td>
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</table>

**OMB Control No:** 2506-0117 (exp. 06/30/2018)

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**Annual Action Plan 2019**

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OMB Control No: 2506-0117 (exp. 06/30/2018)
<table>
<thead>
<tr>
<th>Application for Federal Assistance SF-424</th>
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<tbody>
<tr>
<td><strong>9. Type of Applicant 1: Select Applicant Type:</strong></td>
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<tr>
<td>1. City or Township Government</td>
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<td><strong>Type of Applicant 2: Select Applicant Type:</strong></td>
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<td><strong>Type of Applicant 3: Select Applicant Type:</strong></td>
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<td>* Other (specify):</td>
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<td><strong>10. Name of Federal Agency:</strong></td>
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<td>Department of Housing and Urban Development</td>
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<td><strong>11. Catalog of Federal Domestic Assistance Number:</strong></td>
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<td><strong>CFDA Title:</strong></td>
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<td>Emergency Solutions Grant Program</td>
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<td><strong>12. Funding Opportunity Number:</strong></td>
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<tr>
<td>* Title:</td>
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<td>Emergency Solutions Grant Program</td>
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<td><strong>13. Comptroller Identification Number:</strong></td>
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<td><strong>14. Areas Affected by Project (Cities, Counties, States, etc.):</strong></td>
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<td><strong>15. Descriptive Title of Applicant's Project:</strong></td>
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<tr>
<td>City of Inagota 2019 ESG Program</td>
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<tr>
<td>Attach supporting documentation as specified in agency guidelines.</td>
</tr>
</tbody>
</table>
Application for Federal Assistance SF-424

16. Congressional District(s):
   * a. Applicant: [ ] 1st
   * b. Program/Project: [ ] 91st

Attach an additional list of Program/Project Congressional Districts if needed.

17. Proposed Project:
   * a. Start Date: 01/01/2019
   * b. End Date: 12/31/2023

18. Estimated Funding ($):
   * a. Federal: [ ] 151,721.00
   * b. Applicant: [ ] 0.00
   * c. State: [ ] 0.00
   * d. Local: [ ] 0.00
   * e. Other: [ ] 31,400.00
   * f. Program Income: [ ] 0.00
   * g. TOTAL: [ ] 233,121.00

19. Is Application Subject to Review By State Under Executive Order 12372 Process?
   [ ] a. This application was made available to the State under the Executive Order 12372 Process for review on
   [ ] b. Program is subject to E.O. 12372 but has not been selected by the State for review.
   [ ] c. Program is not covered by E.O. 12372.

20. Is the Applicant Delineated On Any Federal List? (If "Yes," provide explanation in attachment.)
   * Yes [ ] No

* "Yes", provide explanation and attach

31. "By signing this application, I certify (1) the information contained in the list of certifications" and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the requested assistance and agree to comply with all regulations (1) if accepted, I can assure that any false, fictitious, or fraudulent statements or effects may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 21, Section 1901)
   [ ] I AGREE

** The list of certifications and assurances, or an internet site where you may obtain the list, is contained in the announcement or agency specific instructions.

Authorized Representative:

First Name: [ ]
Middle Name: [ ]
Last Name: [ ]
Title: [ ]
Telephone Number: [ ]
Fax Number: [ ]
Email: [ ]
Signature of Authorized Representative: [ ]

OMB Control No: 2506-0117 (exp. 06/30/2018)
ASSURANCES - NON-CONSTRUCTION PROGRAMS

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden, to the Office of Management and Budget, Paperwork Reduction Project (0349-0040), Washington, DC 20503.

PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.

NOTE: Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the awarding agency. Further, certain Federal awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duly authorized representative of the applicant, I certify that the applicant:

1. Has the legal authority to apply for Federal assistance and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project cost) to ensure proper planning, management and completion of the project described in this application.

2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, through any authorized representative, access to and the right to examine all records, books, papers, or documents related to the award, and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.

3. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.

4. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.

5. Will comply with the Intergovernmental Personal Act of 1970 (42 U.S.C. §§4738-4783) relating to prescribed standards for fiscal systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).

6. Will comply with all Federal statutes relating to nondiscrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (42 U.S.C. §§2000a-2000d) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1681-1685, and 1685-1688), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. §794), which prohibits discrimination on the basis of handicap; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended, relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-516), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§522 and 527 of the Public Health Service Act of 1942 (42 U.S.C. §§265, 250 ff.), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seq.), as amended, relating to non-discrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.

7. Will comply or has already complied with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-654) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal or federally assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in such projects.

8. Will comply, as applicable, with provisions of the Truth Act (5 U.S.C. §§1501-1506 and 3324-3326) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.

10. Will comply, if applicable, with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total costs of insurable construction and acquisition is $10,000 or more.

11. Will comply with environmental standards which may be prescribed pursuant to the following: (a) implementation of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) mitigation of wetlands pursuant to EO 11990; (c) water quality standards in floodplains in accordance with EO 11990; (d) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (e) fishery protection of Federal waters and State waters, (f) implementation of State Water Quality Action Plans under Section 170(c) of the Clean Air Act of 1975, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-223); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).

12. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to preserving components or potential components of the national wild and scenic rivers system.


14. Will comply with the National Environmental Policy Act of 1969 (42 U.S.C. §§4321 et seq.) pertaining to the issuance, handling, and treatment of hazardous or infectious substances.

15. Will comply with the United States Code Title 90, Section 384 (42 U.S.C. §284 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of structures.

16. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §4021 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of structures.

17. Will comply with the U.S. Code Title 40, Sections 9112 (42 U.S.C. §9112 et seq.) pertaining to the issuance, handling, and treatment of hazardous or infectious substances.

18. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.

19. Will comply with the requirements of Section 108 of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. §7164) which prohibits grant award recipients or sub-recipients from engaging in severe forms of trafficking in persons during the period of time that the award is in effect (1) Exploiting a commercial sex act during the period of time that the award is in effect or (2) Engaging in a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

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Specific Community Development Block Grant Certifications

The Entitlement Community certifies that:

Citizen Participation — It is in full compliance and following a detailed citizen participation plan that satisfies the requirements of 24 CFR 91.105.

Community Development Plan — Its consolidated plan identifies community development and housing needs and specifies both short-term and long-term community development objectives that have been developed in accordance with the primary objective of the CDBG program (i.e., the development of viable urban communities by providing decent housing and expanding economic opportunities, primarily for persons of low and moderate income) and requirements of 24 CFR Parts 91 and 570.

Following a Plan — It is following a current consolidated plan that has been approved by HUD.

Use of Funds — It has complied with the following criteria:

1. Maximum Feasible Priority. With respect to activities expected to be assisted with CDBG funds, it has developed its Action Plan so as to give maximum feasible priority to activities which benefit low- and moderate-income families or aid in the prevention or elimination of slums or blight. The Action Plan may also include CDBG-assisted activities which the grantee certifies are designed to meet other community development needs having particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community, and other financial resources are not available (see Optional CDBG Certification).

2. Overall Benefits. The aggregate use of CDBG funds, including Section 108 guaranteed loans, during program years( ) , shall principally benefit persons of low and moderate income in a manner that ensures that at least 70 percent of the amount is expended for activities that benefit such persons during the designated period.

3. Special Assessments. It will not attempt to recover any capital costs of public improvements assisted with CDBG funds, including Section 108 loan guaranteed funds, by assessing any amount against properties owned and occupied by persons of low and moderate income, including any fee charged or assessment made as a condition of obtaining access to such public improvements.

However, if CDBG funds are used to pay the proportion of a fee or assessment that relates to the capital costs of public improvements (assisted in part with CDBG funds) financed from other revenue sources, an assessment or charge may be made against the property with respect to the public improvements financed by a source other than CDBG funds.

In addition, in the case of properties owned and occupied by moderate-income (not low-income) families, an assessment or charge may be made against the property for public improvements financed by a source other than CDBG funds if the jurisdiction certifies that it lacks CDBG funds to cover the assessment.

Executive Force — It has adopted and is enforcing:

1. A policy prohibiting the use of excessive force by law enforcement agencies within its jurisdiction against any individuals engaged in non-violent civil rights demonstrations, and

2. A policy of enforcing applicable State and local laws against physically barring entrance to or exit from a facility or location which is the subject of such non-violent civil rights demonstrations within its jurisdiction.
CERTIFICATIONS

In accordance with the applicable statutes and the regulations governing the consolidated plan regulations, the jurisdiction certifies that:

Affirmatively Further Fair Housing — The jurisdiction will affirmatively further fair housing.

Uniform Relocation Act and Anti-displacement and Relocation Plan — It will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, (42 U.S.C. 4601-4655) and implementing regulations at 49 CFR Part 24. It has in effect and is following a residential anti-displacement and relocation assistance plan required under 24 CFR Part 42 in connection with any activity assisted with funding under the Community Development Block Grant or HOME programs.

Anti-Lobbying — To the best of the jurisdiction’s knowledge and belief:

1. No Federal appropriated funds have been paid or will be paid, by or on behalf of it, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement;

2. If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, it will complete and submit Standard Form LL, “Disclosure Form to Report Lobbying,” in accordance with its instructions; and

3. It will require that the language of paragraph 1 and 2 of this anti-lobbying certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients certify and disclose accordingly.

Authority of Jurisdiction — The consolidated plan is authorized under State and local law (as applicable) and the jurisdiction possesses the legal authority to carry out the programs for which it is seeking funding, in accordance with applicable HUD regulations.

Consistency with plan — The housing activities to be undertaken with Community Development Block Grant, HOME, Emergency Solutions Grant, and Housing Opportunities for Persons With AIDS funds are consistent with the strategic plan in the jurisdiction’s consolidated plan.

Section 3 — It will comply with section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701q) and implementing regulations at 24 CFR Part 135.

[Signature of Authorized Official] Dated 5-14-19

[Title]
Specific HOME Certifications:

The HOME participating jurisdiction certifies that:

Tenant Based Rental Assistance — If it plans to provide tenant-based rental assistance, the tenant-based rental assistance is an essential element of its consolidated plan.

Eligible Activities and Costs -- It is using and will use HOME funds for eligible activities and costs, as described in 24 CFR §§92.203 through 92.209 and that it is not using and will not use HOME funds for prohibited activities, as described in §92.214.

Subsidy Layering -- Before committing any funds to a project, it will evaluate the project in accordance with the guidelines that it adopts for this purpose and will not invest any more HOME funds in combination with other Federal assistance than is necessary to provide affordable housing.

[Signature]

City Manager

Title

Date 5-20-19
Compliance with Anti-discrimination laws -- The grant will be conducted and administered in conformity with title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d) and the Fair Housing Act (42 U.S.C. 3601-3619) and implementing regulations.

Lead-Based Paint -- Its activities concerning lead-based paint will comply with the requirements of 24 CFR Part 35, Subparts A, B, J, K and R.

Compliance with Laws -- It will comply with applicable laws.

Signature of Authorized Official

Date

Title
Emergency Solutions Grants Certifications

The Emergency Solutions Grants Program recipient certifies that:

Major rehabilitation/conversion/renovation – If an emergency shelter’s rehabilitation costs exceed 75 percent of the value of the building before rehabilitation, the recipient will maintain the building as a shelter for homeless individuals and families for a minimum of 10 years after the date the building is first occupied by a homeless individual or family after the completed rehabilitation.

If the cost to convert a building into an emergency shelter exceeds 75 percent of the value of the building after conversion, the recipient will maintain the building as a shelter for homeless individuals and families for a minimum of 10 years after the date the building is first occupied by a homeless individual or family after the completed conversion.

In all other cases where ESG funds are used for renovation, the recipient will maintain the building as a shelter for homeless individuals and families for a minimum of 3 years after the date the building is first occupied by a homeless individual or family after the completed renovation.

Essential Services and Operating Costs – In the case of assistance involving shelter operations or essential services related to street outreach or emergency shelter, the recipient will provide services to shelter homeless individuals and families for the period during which the ESG assistance is provided, without regard to a particular site or structure, so long the recipient serves the same type of persons (e.g., families with children, unaccompanied youth, disabled individuals, or victims of domestic violence) or persons in the same geographic area.

Renovation – Any renovation carried out with ESG assistance shall be sufficient to ensure that the building involved is safe and sanitary.

Supportive Services – The recipient will assist homeless individuals in obtaining permanent housing, appropriate supportive services (including medical and mental health treatment, victim services, counseling, supervision, and other services essential for achieving independent living), and other Federal, State, local, and private assistance available for these individuals.

Matching Funds – The recipient will obtain matching amounts required under 24 CFR 576.201.

Confidentiality – The recipient has established and is implementing procedures to ensure the confidentiality of records pertaining to any individual provided family violence prevention or treatment services under any project assisted under the ESG program, including protection against the release of the address or location of any family violence shelter project, except with the written authorization of the person responsible for the operation of that shelter.

Homeless Persons Involvement – To the maximum extent practicable, the recipient will involve, through employment, volunteer services, or otherwise, homeless individuals and families in constructing, renovating, maintaining, and operating facilities assisted under the ESG program, in providing services assisted under the ESG program, and in providing services for occupants of facilities assisted under the program.

Consolidated Plan – All activities the recipient undertakes with assistance under ESG are consistent with its consolidated plan.
Discharge Policy - The recipient will establish and implement, to the maximum extent practicable and where appropriate, policies and protocols for the discharge of persons from publicly funded institutions or systems of care (such as health care facilities, mental health facilities, foster care or other youth facilities, or correction programs and institutions) in order to prevent this discharge from immediately resulting in homelessness for these persons.

[Signature]
Signature of Authorized Official

[5-14-19]
Date

[City Manager]
Title
APPENDIX TO CERTIFICATIONS

INSTRUCTIONS CONCERNING LOBBYING CERTIFICATION:

Lobbying Certification
This certification is a material representation of facts upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than $10,000 and not more than $100,000 for each such failure.