

Executive Summary

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

1. Introduction

This PY 2023 Annual Action Plan effectively implements the fourth year of Moving To Implementation.

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.

1) Infrastructure/Public Facilities: Foster public infrastructure improvements that support other major priorities, including linking residents with jobs, encouraging economic development, and creating a County that is less auto-dependent. Goals 1.1 through 1.6 as listed in Moving To Implementation which encompasses the Consolidated Plan.

2) Business and Workforce Development: Pursue policies/programs that create an environment for economic growth, particularly in Areas of Need. Goals 2.1 through 2.12 as listed in Moving To Implementation which encompasses the Consolidated Plan.

3) Housing Development and Services: Efforts to address the jobs-housing mismatch must include actions that increase the number of affordable housing opportunities in locations with good job access while maintaining the existing housing stock and providing related services in areas of the County where efforts will focus on increasing job opportunities. Goals 3.1 through 3.7 as listed in Moving To Implementation which encompasses the Consolidated Plan.

4) Non-Housing Services: Public services will support the County's goals in other areas, particularly increased coordination among funders and providers, the provision of much needed safety net programs, and improved employment opportunities for all people. Goals 4.1 through 4.4 as listed in Moving To Implementation which encompasses the Consolidated Plan.

3. Evaluation of past performance

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

Since 2010, under the leadership of Cook County President Preckwinkle, DPD has made significant, continual improvements in its operations including the commitment and expenditure of older remaining funds for eligible uses, clearance of outstanding audit findings, and ongoing reorganization of staffing and programs for increased efficiencies and enhanced community impacts. In 2013, DPD benefited from OneCPD technical assistance (TA) provided by HUD and delivered by ICF. Through this TA, DPD developed extensive policies and procedures for Community Development, Housing, Economic Development, Finance, Planning/Policy, Compliance, Construction Management, and Office Management. These policies/procedures will continue to evolve over time based upon operational enhancements and regulatory changes. Additionally, ICF assisted DPD in analyzing operational needs and resources including staff capacities/ workloads. This resulted in the development of an updated organizational structure and position descriptions. Implementation of these via a formal reorganization is pending in consultation with Human Resources.

Over the last 12 years throughout the aforementioned transitions, DPD has reflected on historical practices in administering HUD-funded programming. DPD leadership recognized the critical need for a strategic plan with clear, realistic, actionable objectives that would unite the various functional areas under a common purpose and tap into the expertise of local and regional stakeholders. Previously, programming was designed and deployed by funding source with limited coordination. Under Planning for Progress, and continuing with Moving To Implementation, programming is organized by functional area- Community Development, Housing, and Economic Development- facilitating collaboration and consultation between them for coordinated investments. DPD also consulted with other County departments or affiliate agencies who were in the process of developing or implementing strategic plans and special initiatives to ensure Moving To Implementation was complementary in its approach. Moving To Implementation articulated goals, strategies, and priorities that addressed specific and critical data -driven needs that existed then and will likely persist throughout the 5 year period covered by the plan. DPD has already identified existing resources and will continue to aggressively pursue additional funding and technical assistance to address said needs.

4. Summary of Citizen Participation Process and consultation process

Summary from citizen participation section of plan.

DPD regularly makes presentations and announces key initiatives and related input opportunities to local stakeholder groups, subcommittees, boards, and commissions. Since DPD's programs largely target

low - and moderate- income and other vulnerable populations, DPD coordinates frequently with stakeholder agencies serving these groups.

DPD's Economic Development Advisory Committee (EDAC) meets ten times per year and also offers an opportunity for public comment on each agenda.

As lead agency for the Cook County HOME Consortium, DPD consults with current and prospective municipal Consortium members regarding proposed priorities, goals, and strategies, particularly related to housing.

DPD also coordinates with and solicits feedback from local public housing authorities (PHA), the Continuum of Care leadership and members, and the Chicago Area Fair Housing Alliance (CAFHA).

This plan was made available for 30 days for public review and comment June 5th 2023 until July 5th 2023. A public hearing will be held on June 27th 2023.

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.

DPD is committed to the following in developing this plan:

(a) Initiating a Countywide and sub-regional dialogue around housing, community, and economic development issues and strategies.

(b) Engaging partners, stakeholders, and citizens in the development, review, and implementation of the proposed plan.

(c) Identifying overall and geographically focused priorities, as well annual goals and objectives.

(d) Aligning and coordinating Federal, State, and/or local resources for expanded community impact.

No comments were received were received.

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

No comments were received.

7. Summary

A number of factors beyond coordination and efficiency spurred DPD to initiate Moving To Implementation as outlined below:

(a) Build off previous planning efforts. Many entities, including Cook County and CMAP have done substantial work on the topics covered by this plan, particularly through ON TO 2040 and the Cook County Policy Roadmap.

(b) Support regional initiatives. While Moving To Implementation is not regional in scope, it has significant potential to produce positive regional impacts in alignment with other strategic initiatives such as the Chicago Metro Metals Consortium.

(c) Allocating new resources. Moving To Implementation will incorporate newer resources as they are available.

(d) Declining annual Federal entitlement funding. Cook County's annual Federal entitlement funds have declined over the last decade. While Section 108, CDBG-DR, and potential resources through future funding applications can offset the overall decline, they are one-time allocations. By investing its funds in the issues and locations that matter the most to stakeholders, DPD can make best use of limited available resources.

(e) Strong leadership. Cook County President Preckwinkle established economic development as a major focus of her administration. She created the Cook County Bureau of Economic Development (BED) and convened the Cook County Council of Economic Advisors (CEA), a group of accomplished business and civic leaders, to advise the County on long-term economic growth strategies.

(f) Seeking additional resources. Needs far outstrip resources in Cook County. This plan will help build and sustain relationships with other entities (non-for-profit, for-profit, and public) to increase the resources arrayed against identified issues.

(g) Changing demographics and market conditions. As outlined further in this plan, evolving market realities and demographic changes over the past several years justify a new approach to addressing local needs.

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

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

The following are the agencies/entities responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source.

Agency Role	Name	Department/Agency
Lead Agency	COOK COUNTY	
CDBG Administrator	COOK COUNTY	Department of Planning and Development
HOPWA Administrator		
HOME Administrator	COOK COUNTY	Department of Planning and Development
ESG Administrator	COOK COUNTY	Department of Planning and Development
HOPWA-C Administrator		

Table 1 – Responsible Agencies

Narrative

Consolidated Plan Public Contact Information

The primary point of contact for inquiries related to Moving To Implementation or the Consolidated Plan (Con Plan), this Annual Action Plan, as well as requests for Certification of Consistency with the Con Plan is Susan Campbell, Director, Cook County Department of Planning and Development, 69 West Washington, Suite 2900, Chicago, Illinois, 60602, 312 - 603 - 1036, susan.campbell@cookcountyl.gov.

The primary point of contact for inquiries related to Department of Planning and Development operations and overall programs is Susan Campbell, Director, Cook County Department of Planning and Development, 69 West Washington, Suite 2900, Chicago, Illinois, 60602, 312 - 603 - 1036 susan.campbell@cookcountyil.gov

The primary point of contact for inquiries related to community development programming is Cheryl Cooke, Deputy Director , Cook County Department of Planning and Development, 69 West Washington, Suite 2900, Chicago, Illinois, 60602, 312 - 603 - 1015, cheryl.cooke@cookcountyil.gov.

The primary point of contact for inquiries related to affordable housing programming is Karl Bradley, Deputy Director, Cook County Department of Planning and Development, 69 West Washington, Suite 2900, Chicago, Illinois, 60602, 312 - 603 - 1009, karl.bradley@cookcountyil.gov.

The primary point of contact for inquiries related to economic development programming is Mohammed Elahi, Deputy Director, Cook County Department of Planning and Development, 69 West Washington, Suite 2900, Chicago, Illinois, 60602, 312 - 603 - 0310, mohammed.elahi@cookcountyil.gov.

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

1. Introduction

During Moving To Implementation development, DPD deployed an array of outreach methods to engage and consult with local, regional, State, and Federal stakeholders representing the public, private, and not-for-profit sectors including: Region V EDA and HUD; State of Illinois IHDA and DCEO; Cook County Bureaus of Administration and Economic Development; Departments of Planning and Development, Transportation and Highways, Environment and Sustainability, Emergency Management and Regional Security, Public Health; Cook County Land Bank Authority; Chicago Cook Workforce Partnership; and Forest Preserve District of Cook County; South Suburban Land Bank and Development Authority; Alliance to End Homelessness in Suburban Cook County and members (Continuum of Care); Chicago Area Fair Housing Alliance and members; Public Housing Authorities of Cook County, Oak Park, Park Forest, Maywood, and Cicero; Councils of Government - West Central Municipal Conference, South Suburban Mayors and Managers Association, Southwest Conference of Mayors, and Northwest Municipal Conference; City of Chicago Departments of Planning & Development and Budget; Cook County Council of Economic Advisors; Cook County Economic Development Advisory Committee; Cook County Board of Commissioners; Chicago Metropolitan Agency for Planning leadership and various subcommittees; RW Ventures; Housing Action Illinois; Preservation Compact; Metropolitan Planning Council; and others representing financial institutions, philanthropic organizations, educational and research institutions, residential and commercial developers, assisted housing providers, landlords, fair housing advocates, social service providers, private and governmental health, mental health, and service

agencies, major employers, business and trade associations, workforce development providers, elected officials, and agencies focused on serving the homeless or other special needs populations. Targeted consultation also occurred with all HUD entitlement municipalities within Cook County boundaries, including HOME Consortium member municipalities, particularly related to housing strategies. The County as a CDBG - DR grantee conducts regular consultation with other area agencies relative to flood mitigation, water resources, and resilience planning. Through internal and external partners and local municipalities the County continues to engage in broadband planning efforts.

During development of this Annual Action Plan, DPD solicited additional input from these stakeholder groups as well as the general public via public hearing and review/comment opportunities notices.

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)).

DPD regularly consults with leadership and staff from all local public housing authorities as well as representatives from the Chicago Area Fair Housing Alliance, Corporation for Supportive Housing, and the Alliance to End Homelessness in Suburban Cook County (Alliance) around related housing and

service needs as well as coordination opportunities. Consultation also includes discussion of publicly funded institutions and systems of care that may discharge persons into homelessness including health care facilities, mental health facilities, foster care, and corrections programs. Follow-up regarding needs data as well as input in prospective goals, priorities, and strategies is ongoing. Feedback provided is incorporated in the plan as appropriate.

DPD is also engaged in ongoing discussion with the Alliance, Housing Authority of the County of Cook County (HACC), United Way, and other stakeholders regarding the possibility of bringing a comprehensive resource and referral system to suburban Cook County to reduce or eliminate gaps in existing networks. Presently, the Chicago metropolitan area is the only such area of its size that lacks a 211 system, which often serves this purpose. The United Way of Metro Chicago in partnership with Deloitte consultants previously conducted a 211 - feasibility study. DPD aims to build on this effort and will continue to explore, in partnership with other stakeholders, whether existing systems might be upgraded, merged, or otherwise replaced with something more functional. DPD has been staying informed about Chicago's efforts to modernize their 311 system, and the County recently proposed exploration of a 211 system as an area for collaboration between the County and the new leadership at the City of Chicago. DPD anticipates participating in related discussions with Chicago, United Way and other partners and contributing future funding to the costs of system development, implementation, and/or ongoing operations.

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.

DPD and HACC have existing strong relationships with the Alliance and its Continuum of Care members. However, DPD continues to explore opportunities for enhanced collaboration and partnership with both agencies. Towards this end, DPD has convened meetings between the Alliance and the Chicago Cook Workforce Partnership regarding how workforce development services might be better integrated in service delivery for persons who are homeless or at-risk of homelessness.

The Alliance to End Homelessness in Suburban Cook County leads the Cook County Continuum of Care. It is a highly collaborative and functional coordinator of homeless funding and programming on behalf of suburban Cook County. DPD and the Alliance are strong partners and allies. Historically, DPD staff has held a seat on the Alliance Board and actively participates in strategic planning sessions and regular Board/subcommittee meetings throughout the year. During Moving To Implementation, DPD leadership also participated in the development of the Alliance's strategic plan. Major tenets of this newly revised strategic plan were incorporated in and directly informed Moving To Implementation and the Consolidated Plan which further inform this Annual Action Plan. This includes adoption of

Alliance strategies that aim 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.

DPD consulted heavily with the Alliance and its Continuum of Care members throughout plan development and expects this coordination to continue and expand during plan implementation. Some of this is facilitated via seats on respective Boards. DPD staff maintains a seat on the Alliance Board and participates in the Board as well as several subcommittees. Through this role, DPD stays engaged with on-the-ground housing and service providers who are most keenly aware of local needs related to homelessness. Additionally, DPD has a voice as a Board member in Alliance operations, programming, and special initiatives including those funded directly by HUD through the Shelter Plus Care and Supportive Housing Programs. Conversely, DPD has added an Alliance representative to its EDAC on the newly reconstituted Planning and Development Subcommittee. In this role, the Alliance is involved in consultation and decision-making around economic development, affordable housing, and community development in suburban Cook County as supported by CDBG, CDBG-DR, ESG, HOME, and Section 108 funds. Specifically, this action-oriented subcommittee informs funding investments and partnerships for DPD programs, projects, and special initiatives. As such, the Alliance plays a critical role in determining how to allocate ESG funds and supporting HMIS in suburban Cook County.

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

On a daily basis, a DPD staffer also serves as a dedicated liaison to the Alliance and is charged with ensuring appropriate coordination. This liaison and other DPD staff communicate regularly with Alliance staff and facilitates information sharing as well as discrete coordination related to the development, implementation, and evaluation of performance metrics as well as protocols for the administration of HMIS. Each year, DPD discusses potential allocation proportions across the various ESG components. Together, they work towards mutual agreement based on prior experiences, perceived needs, and funding gaps. Related recommendations are then subject to the review and approval of DPD's and the Alliance's respective Boards. Regarding performance metrics, DPD and the Alliance previously consulted upon the release of the revised ESG regulations and made a determination to utilize Alliance Dashboard measures as performance standards to increase effectiveness and efficiency. Specific to HMIS, DPD and the Alliance continue to partner to ensure that all ESG organizations (excluding those who serve domestic violence victims given confidentiality concerns) utilize HMIS. Based

on mutual agreement, the Alliance as lead agency is the only entity eligible for HMIS funding and is charged with maintaining the software license, conducting related trainings, and developing the Continuum's Annual Homeless Assessment Report (AHAR).

2. Agencies, groups, organizations and others who participated in the process and consultations

Table 2 – Agencies, groups, organizations who participated

1	Agency/Group/Organization	HOME Consortium Members
	Agency/Group/Organization Type	Other government - Local
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Non-Homeless Special Needs Market Analysis Lead-based Paint Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	During the planning process, DPD informally consults with its HOME Consortium entitlement municipal members to solicit input regarding its current and prospective goals, priorities, and strategies, particularly as it relates to affordable housing and HOME funding usage. Any related input is incorporated in this Annual Action Plan.
2	Agency/Group/Organization	CHICAGO AREA FAIR HOUSING ALLIANCE
	Agency/Group/Organization Type	Housing Service-Fair Housing Regional organization

	<p>What section of the Plan was addressed by Consultation?</p>	<p>Housing Need Assessment Public Housing Needs Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Non-Homeless Special Needs Market Analysis Anti-poverty Strategy</p>
	<p>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</p>	<p>During the planning process, DPD informally consults with CAFHA leadership and membership to solicit input regarding its current and prospective goals, priorities, and strategies, particularly as it relates to fair housing. Related input was incorporated in this Annual Action Plan.</p>
3	<p>Agency/Group/Organization</p>	<p>Public Housing Agencies</p>
	<p>Agency/Group/Organization Type</p>	<p>Housing PHA</p>
	<p>What section of the Plan was addressed by Consultation?</p>	<p>Housing Need Assessment Public Housing Needs Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Anti-poverty Strategy Lead-based Paint Strategy</p>

	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	During the planning process, DPD informally consults with its public housing agencies to solicit input regarding its current and prospective goals, priorities, and strategies, particularly as it relates to affordable housing. Related input was incorporated in this Annual Action Plan.
4	Agency/Group/Organization	Alliance to End Homelessness in Suburban Cook County
	Agency/Group/Organization Type	Services-homeless
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Market Analysis Economic Development Anti-poverty Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	During the planning process, DPD informally consults with its Continuum of Care leadership and members to solicit input regarding its current and prospective goals, priorities, and strategies, particularly as it relates to affordable housing and HUD funding usage (especially ESG). Related input was incorporated in this Annual Action Plan.

5	Agency/Group/Organization	Other Economic Development, Affordable Housing, and Community Development Stakeholders
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Agency/Group/Organization Type	<ul style="list-style-type: none"> Housing PHA Services - Housing Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Victims of Domestic Violence Services-homeless Services-Health Services-Education Services-Employment Service-Fair Housing Services - Victims Health Agency Publicly Funded Institution/System of Care Other government - Federal Other government - State Other government - County Other government - Local Regional organization Planning organization Business Leaders Community Development Financial Institution Foundation Grantee Department Major Employer Neighborhood Organization Private Sector Banking / Financing
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	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Non-Homeless Special Needs Market Analysis Economic Development Anti-poverty Strategy Lead-based Paint Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	During the planning process, DPD consulted with and solicited input from an array of public, private, and non profit stakeholders representing different sectors and geographies regarding its current and prospective goals, priorities, and strategies, particularly as it relates to HUD funding usage. Related input was incorporated in this Annual Action Plan.
6	Agency/Group/Organization	Housing Authority of Cook County (HACC)
	Agency/Group/Organization Type	PHA
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Market Analysis

<p>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</p>	<p>CNT made formal presentations throughout the development of the consolidated plan to the Cook County Economic Development Advisory Committee, on which HACC has a seat. CNT requested specific data from HACC to inform the Housing Needs Assessment. HACC submitted that data and it was incorporated into the Assessment. CNT also requested feedback on a plan draft in June, 2021, although none was received.</p>
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Identify any Agency Types not consulted and provide rationale for not consulting

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

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Continuum of Care	Alliance to End Homelessness in Suburban Cook County	The goals, strategies, and priorities outlined in this strategic plan directly informed Moving To Implementation and this Annual Action Plan, as it relates to affordable housing, community development, and economic development programs, projects, or special initiatives that might alleviate homelessness or otherwise support homeless persons. DPD management and staff actively participated in the Alliance's development and implementation of their strategic plan.
On to 2050 Regional Comprehensive Plan	Chicago Metropolitan Agency for Planning	The goals, strategies, and priorities outlined in this strategic plan directly informed Moving To Implementation and this Annual Action Plan, as it relates to affordable housing, community development, and economic development programs, projects, or special initiatives with a regional impact or connection. DPD management and staff actively participated in CMAP's development and implementation of their strategic plan.

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Long-Range Transportation Plan	Cook County Department of Transportation and Highway	The goals, strategies, and priorities outlined in this strategic plan directly informed Moving To Implementation and this Annual Action Plan, as it relates to affordable housing, community development, and economic development programs, projects, or special initiatives that might impact or be impacted by transit options. DPD management and staff actively participated in DOT's development and implementation of their strategic plan.

Table 3 – Other local / regional / federal planning efforts

Narrative

Regular announcements regarding plan milestones as well as review and input opportunities are disseminated electronically to DPD mailing lists as well as highlighted verbally in informal and formal meetings of various groups, subcommittees, boards, commissions and special events. Special accommodations for persons with disabilities or limited English proficiency are made available to expand citizen access to participation opportunities. Outreach also specifically targets groups representing the interests of racial/ethnic minorities and other vulnerable populations. Additionally, other County agencies and external partners disseminate news of the plan further by sharing related information and notices of input opportunities/public meetings with their colleagues, members, and other points of contact. As a result, the scope, volume, and consistency of input provided are very robust and exceed that typically received under prior similar efforts.

DPD is also in the process of developing a Language Access Plan which will be released for public comment, reviewed, and considered for approval by the EDAC within the next year. Corresponding revisions to the Citizen Participation Plan will follow. Additionally, a Countywide RFP is currently under development for verbal/written language translation services. Each of these efforts, once complete, will reduce barriers to public input as it relates to limited English proficiency.

AP-12 Participation - 91.401, 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

A plan is only as good as the commitment to implementing it by the public, key stakeholders, and local public officials. The planning process incorporated an outreach and engagement strategy designed to effectively engage key public, private, and not-for-profit stakeholders at the regional and local levels as well as the general public.

DPD regularly solicits input regarding program design and operations through annual strategic planning and performance reporting efforts. All DPD outreach efforts comply with the County's Citizen Participation Plan, by ensuring sufficient advance notice via newspaper publication, website posting, and electronic email blast of public review/comment opportunities including public hearings.

DPD regularly makes presentations and announces key initiatives and related input opportunities to local stakeholder groups, subcommittees, boards, and commissions. Since DPD's programs largely target low, and moderate - income and other vulnerable populations, DPD coordinates frequently with stakeholder agencies serving these groups.

DPD's Economic Development Advisory Committee (EDAC) meets bi - monthly and also offers an opportunity for public comment on each agenda.

As lead agency for the Cook County HOME Consortium, DPD consults with current and prospective municipal Consortium members regarding proposed priorities, goals, and strategies, particularly related to housing.

DPD also coordinates with and solicits feedback from local public housing authorities (PHA), the Continuum of Care leadership and members, and the Chicago Area Fair Housing Alliance (CAFHA).

This draft plan was made available for 30 days for public review and comment. Specific funding recommendations were presented to and approved at public hearings sponsored by the EDAC Planning and Development Subcommittee, full EDAC, and Cook County Board of Commissioners.

Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
1	Newspaper Ad	Non-targeted/broad community	A newspaper ad will be placed in the Chicago Tribune to publicize the availability of the draft document for review and comment.	Pending	Pending	
2	Website Posting	Persons with disabilities Non-targeted/broad community Residents of Public and Assisted Housing	Information is posted on the County's website to publicize related public meetings and the availability of the draft document for review and comment.	Pending	Pending	
3	Public Hearing	Non-targeted/broad community	A public hearing will be held during the Month of June 2023. The public will be notified and invited to attend to provide feedback.	Pending	Pending	

Table 4 – Citizen Participation Outreach

Expected Resources

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

Introduction

This Annual Action Plan reflects the diversity of funding sources that the County will tap to support implementation. Beyond its annual entitlements (i.e. CDBG, HOME, and ESG), the County has 4 other major sources of funds that it anticipates will support this plan. Cook County will utilize its corporate funds on an as needed basis to support department operations, particularly associated with staffing for business and workforce development and planning and administration. As noted earlier, DPD received a commitment of \$30 million through HUD’s Section 108 program in 2013 to establish the BUILT in Cook loan fund. The proposed uses of these funds align closely with Moving To Implementation. Due to flooding in Cook County in 2013, the Department has received \$83.6 million in disaster relief funds (i.e. CDBG - DR) to advance flood recovery efforts in areas of unmet need. The use of the remaining funding will be consistent with this Annual Action Plan. DPD administers a number of economic development programs and those programs will also support this Annual Action Plan. The over \$280 million in core resources will leverage almost \$300 million in additional dollars based on the County’s historic funding patterns, particularly matched dollars from HOME, CDBG, and ESG projects, over the five year period covered by Moving To Implementation. Beyond these core resources and associated leveraging, the County will seek additional funds to support plan implementation. The funds include applications to the EDA; seeking Choice Neighborhoods grants and NMTC; and pursuit of other grants.

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	10,251,381	0	0	10,251,381	10,200,000	Community Development Block Grant
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	6,986,256	0	0	6,986,256	6,900,000	HOME Partnership

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
ESG	public - federal	Conversion and rehab for transitional housing Financial Assistance Overnight shelter Rapid re-housing (rental assistance) Rental Assistance Services Transitional housing	856,336	0	0	856,336	8,500,000	Emergency Solutions Grant
Section 108	public - federal	Economic Development	0	0	0	0	0	Section 108 Funds supporting the BUILT fund and related economic development activities. Cook County does not plan to undertake any Section 108 projects during PY 2023

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
Other	public - federal	Acquisition Admin and Planning Economic Development Homeowner rehab Multifamily rental new construction Multifamily rental rehab Public Improvements	0	0	0	0	0	Community Development Block Grant Disaster Recovery (CDBG - DR) funds support economic development, affordable housing, and community development efforts in response to declared major flooding disasters occurring in Cook County in 2013. The original full allocation was \$83.6 million.

Table 2 - Expected Resources – Priority Table

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

ESG funding recipients will provide a 1:1 match while HOME funding recipients will be required to demonstrate eligible match resources at or above the 25% threshold requirement. The County may also utilize its excess match bank to meet HOME program match requirements. Typically, HOME funding contributes 11% of overall project costs, delivering a 9:1 lever on HOME funds on average. Other state housing authority and private resources will be leveraged to both HOME and ESG programming.

Cook County does not plan to undertake any Section 108 projects during PY 2023.

While CDBG funds do not explicitly require a match, DPD is beginning to track related data and may impose this as a requirement in the future. Additional limited corporate funds or corporate tax incentives may also be deployed in service of this plan. Based on historic funding patterns, an estimated \$280 million in core resources over the five year period has the potential to leverage an additional \$300 million. Additionally, the Alliance to End Homelessness in Suburban Cook County (who manages the Continuum of Care) also receives direct funding from HUD. While these dollars do not flow directly through DPD, they are largely directed towards similar goals and DPD will continue to partner with the Alliance to ensure all available resources are appropriately leveraged to meet critical needs. These Shelter Plus Care (S+C) and Supportive Housing Program (SHP) dollars as well as other resources at the Alliance's disposal are estimated at \$71 million over the 5 year term. Beyond these core resources and associated leveraging, DPD will continue to pursue other competitive funding opportunities through public and private sources. Moreover, DPD continues to coordinate with other jurisdictions in the region to explore opportunities for information and resource sharing and general collaboration given shrinking administrative resources.

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

Cook County does not currently directly publicly own land or property that can be used to specifically address needs in the plan. However, DPD will continue to coordinate with the Cook County Land Bank Authority, South Suburban Land Bank Development Authority, and various municipalities who do publicly own land to ensure related uses are consistent with Moving To Implementation, where applicable.

Discussion

Moving To Implementation and this corresponding 2023 Annual Action Plan aim to address local needs through the following goals, priorities, and strategies. Note – the overall priority categories are listed below in ranked order from highest to lowest but the subsequent bullet points detailing related goals and strategies are not in any particular order. Additionally, even if a category is identified as a lower priority, resources may still be dedicated to support it as appropriate. Prior year resources for HOME are from PY 2020 (\$600,000) , and 2021 (\$2,000,000).

The \$3,500,000 program income listed for HOME is from prior years.

- (a) Infrastructure/Public Facilities
- (b) Business and Workforce Development
- (c) Housing Development and Services
- (d) Non - Housing Services
- (e) Planning and Administration

Annual Goals and Objectives

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

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Infrastructure and Public Facilities	2020	2024	Non-Housing Community Development		Infrastructure and Public Facilities	CDBG: \$6,663,398	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 10000 Persons Assisted Businesses assisted: 3 Businesses Assisted Other: 10 Other

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
2	Housing Development and Services	2020	2024	Affordable Housing Public Housing Special Needs		Business and Workforce Development Planning and Administration	HOME: \$5,239,895 ESG: \$792,111	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 6000 Persons Assisted Tenant-based rental assistance / Rapid Rehousing: 100 Households Assisted Homeless Person Overnight Shelter: 2500 Persons Assisted Overnight/Emergency Shelter/Transitional Housing Beds added: 10 Beds Homelessness Prevention: 200 Persons Assisted Housing for Homeless added: 10 Household Housing Unit
3	Non-Housing Services	2020	2024	Homeless Non-Homeless Special Needs		Non Housing Services	CDBG: \$1,537,707	Public service activities other than Low/Moderate Income Housing Benefit: 45000 Persons Assisted
4	Planning and Administration	2020	2024	Planning and Administration		Planning and Administration	CDBG: \$2,050,276 HOME: \$698,653 ESG: \$64,225	
5	Business and Workforce Development	2020	2024	Non-Housing Community Development		Business and Workforce Development	Section 108: \$0	

Table 3 – Goals Summary

Annual Action Plan
2023

Goal Descriptions

1	Goal Name	Infrastructure and Public Facilities
	Goal Description	
2	Goal Name	Housing Development and Services
	Goal Description	
3	Goal Name	Non-Housing Services
	Goal Description	
4	Goal Name	Planning and Administration
	Goal Description	
5	Goal Name	Business and Workforce Development
	Goal Description	

AP-35 Projects - 91.420, 91.220(d)

Introduction

This 2023 Annual Action Plan summarizes the proposed programs, projects, and special initiatives that will implement the third year of Moving To Implementation; specifically as it relates to the 2020 - 2024 Consolidated Plan and its related goals, strategies and priorities which aim to address specific and current needs supported by extensive data analysis and public/stakeholder input. The project summary below details anticipated sources and uses of funding. A discussion and current updated project information for the Cook County CDBG - DR grant can be found at the following link [Disaster Recovery and Resilience - CDBG-DR | CookCountyIL.gov](#). The County's priorities include activities related to remediation, acquisition, infrastructure, replacement housing, and other planning, and housing assistance as identified throughout the grant life cycle.

#	Project Name
1	CDBG Planning and Administration
2	CDBG Capital Improvements-Infrastructure
3	CDBG Public Service
4	Housing Development and Services
5	ESG Administration and Programming
6	HOME Administration
7	Business and Workforce Development
8	HOME CHDO Set-Aside

Table 4 – Project Information

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

AP-38 Project Summary
Project Summary Information

1	Project Name	CDBG Planning and Administration
	Target Area	
	Goals Supported	Planning and Administration
	Needs Addressed	Planning and Administration
	Funding	CDBG: \$205,027,620
	Description	Support of administration and planning activities. Individual allocations will be specified in IDIS during activity setup.
	Target Date	9/30/2024
	Estimate the number and type of families that will benefit from the proposed activities	Support of administration and planning activities. Individual allocations will be specified in IDIS during activity setup.
	Location Description	Countywide, but based in the County Office at 69 W. Washington, Chicago, IL
	Planned Activities	
2	Project Name	CDBG Capital Improvements-Infrastructure
	Target Area	
	Goals Supported	Infrastructure and Public Facilities
	Needs Addressed	Infrastructure and Public Facilities
	Funding	CDBG: \$6,663,397
	Description	Support of capital improvement infrastructure activities through subrecipient agencies. Individual allocations will be specified in IDIS during activity setup.
	Target Date	9/30/2024
	Estimate the number and type of families that will benefit from the proposed activities	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 10000 Persons Assisted Businesses assisted: 3 Businesses Assisted Other: 10 Other
	Location Description	Throughtout suburban Cook County.
	Planned Activities	Support of capital improvement infrastructure activities through subrecipient agencies. Individual allocations will be specified in IDIS during activity setup.

3	Project Name	CDBG Public Service
	Target Area	
	Goals Supported	Non-Housing Services
	Needs Addressed	Non Housing Services
	Funding	CDBG: \$1,537,707
	Description	Support of public service activities through subrecipient agencies. Individual allocations will be specified in IDIS during activity setup.
	Target Date	9/30/2024
	Estimate the number and type of families that will benefit from the proposed activities	Public service activities other than Low/Moderate Income Housing Benefit: 45000 Persons Assisted
	Location Description	Througout suburban Cook County.
	Planned Activities	Support of capital improvement infrastructure activities through subrecipient agencies. Individual allocations will be specified in IDIS during activity setup.
4	Project Name	Housing Development and Services
	Target Area	
	Goals Supported	Housing Development and Services
	Needs Addressed	Housing Development and Services
	Funding	HOME: \$5,239,894
	Description	Support of housing development activities through qualified developers. Individual allocations will be specified in IDIS during activity setup.
	Target Date	
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	Througout suburban Cook County.
	Planned Activities	Support of housing development activities through qualified developers. Individual allocations will be specified in IDIS during activity setup.
5	Project Name	ESG Administration and Programming

	Target Area	
	Goals Supported	Housing Development and Services
	Needs Addressed	Business and Workforce Development
	Funding	ESG: \$856,336
	Description	Support of Cook County administration of ESG funds. Support of administration, shelter, and service activities through various sub recipient agencies. Individual allocations will be specified in IDIS during activity has been set aside to support the suburban Continuum of Care's Coordinated Entry System. The\$856,336 is a combination of the Administration Fee (\$64,225.20), and the Homeless Services (\$792,110.80).
	Target Date	9/30/2024
	Estimate the number and type of families that will benefit from the proposed activities	Public service activities other than Low/Moderate Income Housing Benefit: 6000 Persons Assisted Tenant-based rental assistance / Rapid Rehousing: 100 Households Assisted Homeless Person Overnight Shelter: 2500 Persons Assisted Overnight/Emergency Shelter/Transitional Housing Beds added: 10 Beds Homelessness Prevention: 200 Persons Assisted Housing for Homeless added: 10 Household Housing Unit
	Location Description	Throughtout suburban Cook County.
	Planned Activities	Support of Cook County administration of ESG funds. Support of administration, shelter, and service activities through various sub recipient agencies. Individual allocations will be specified in IDIS during activity has been set aside to support the suburban Continuum of Care's Coordinated Entry System. The\$856,336 is a combination of the Administration Fee (\$64,225.20), and the Homeless Services (\$792,110.80).
6	Project Name	HOME Administration
	Target Area	
	Goals Supported	Planning and Administration
	Needs Addressed	Planning and Administration
	Funding	HOME: \$698,652
	Description	Support of Cook County administration of HOME funds.
	Target Date	9/30/2024

	Estimate the number and type of families that will benefit from the proposed activities	Support of Cook County administration of HOME funds.
	Location Description	Countywide, but based in the County office at 69 W. Washington, Chicago, IL 60602.
	Planned Activities	Support of Cook County administration of HOME funds.
7	Project Name	Business and Workforce Development
	Target Area	
	Goals Supported	
	Needs Addressed	
	Funding	:
	Description	Cook County does not plan to undertake any Section 108 projects during PY 2023.
	Target Date	
	Estimate the number and type of families that will benefit from the proposed activities	Cook County does not plan to undertake any Section 108 projects during PY 2023.
	Location Description	Cook County does not plan to undertake any Section 108 projects during PY 2023.
	Planned Activities	Cook County does not plan to undertake any Section 108 projects during PY 2023.
8	Project Name	HOME CHDO Set-Aside
	Target Area	
	Goals Supported	Housing Development and Services
	Needs Addressed	Housing Development and Services
	Funding	HOME: \$1,047,978
	Description	Support of housing development activities through certified eligible CHDOs. Individual allocations will be specified in IDIS during activity setup.
	Target Date	

	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	Througout suburban Cook County.
	Planned Activities	Support of housing development activities through certified eligible CHDOs. Individual allocations will be specified in IDIS during activity setup.

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

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

Cook County serves as the lead entity for the Cook County Urban County, which presently includes most municipalities in Cook County except: Arlington Heights, Berwyn, Chicago, Cicero, Des Plaines, Evanston, Hoffman Estates, Morton Grove, Mount Prospect, Oak Lawn, Oak Park, Palatine, Schaumburg, and Skokie. Additionally, Cook County serves as the lead entity for the Cook County HOME Consortium which presently includes all municipalities in Cook County except: Chicago, Evanston, and Skokie. This 2023 Annual Action Plan is only applicable to the current jurisdictional boundaries of the Cook County Urban County and HOME Consortium.

Geographic Distribution

Target Area	Percentage of Funds
South Suburban Cook County	61

Table 5 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

An important component of Moving To Implementation and this corresponding 2023 Annual Action Plan is strategically targeting County investments to specific geographies. While the plans' goals are designed

to stimulate economic growth and equity throughout Cook County, particular types of investment are preferred for certain geographies given the underlying market conditions. DPD will continue its focus on the revitalization of the southern suburbs via the South Suburban Economic Growth Initiative and the recently formed Southland Development Authority. As a result, a significant percentage of DPD's HUD funding will be directed toward economic development, housing development, and community development efforts in south Cook. The western suburbs will also receive necessary capital improvement investments. Public services will be supported throughout suburban Cook County, with an emphasis on the south suburbs. Preservation of affordable housing will be a focus in the northern suburbs.

Additionally, as noted earlier, some suburban municipalities who are also members of the Cook County HOME Consortium also receive their own entitlement CDBG and/or ESG funds directly from HUD and make their own funding decisions. However, DPD continues to coordinate with these communities to ensure that HOME funding is appropriately deployed geographically to meet varying local needs.

Discussion

Affordable Housing

AP-55 Affordable Housing - 91.420, 91.220(g)

Introduction

As noted in Moving to Implementation, the suburban Cook County housing market faces several challenges including a strong jobs - housing mismatch, an insufficient supply of affordable housing, disproportionate location of affordable housing in communities with higher concentrations of poverty and racial/ethnic segregation, a rapidly aging population with unique housing needs, aging housing stock

in need of repair and probable lead - based paint abatement, declining home values, rising property taxes, and an increasing number of cost - burdened households, particularly among renters, across all income levels.

There are geographic distinctions as well. Housing markets reflect historic development trends, racial and immigration discriminatory practices. Outer ring suburbs generally reflect the newest residential development within first and second generation ownership and ones with increased land availability and

amenities are generally highly sought after. Historic suburban inner ring suburbs with either large square footage within either the Home or the land elements enjoy a resurgence in all parts of the County. Working class housing stock featuring historic and modern bungalows or Cape Cod styles vary in

demand and presentation throughout the area, pending the nature and compatibility of building materials. Existing affordable housing is mostly concentrated in south and more limited in north and west suburban Cook County.

Senior citizens, disabled persons, unaccompanied youth, veterans, and ex - offenders also have special housing needs. In order to address the aforementioned needs, DPD will deploy its HOME funding to support affordable housing development including single, and multi - family housing and to meet the needs of current or prospective homebuyers, homeowners, or renters.

In the south suburbs, resources will leverage funding from other investors to build new state of the art affordable housing for seniors and other vulnerable populations to ensure that a stock of new affordable

units exists as these areas revitalize. Whereas in the north and west, funds will likely emphasize preserving the stock of affordable housing. DPD will work with the Housing Authority of Cook County to encourage greater access to housing in these communities through available vouchers. And DPD will continue to support affordable housing development that serves special needs groups including but not limited to permanent supportive housing projects county - wide.

Collaboration and coordination with the local public housing authorities including HACC, the Continuum

of Care, and municipal members of the Cook County HOME Consortium will also be ongoing to ensure proposed developments appropriately meet local needs and help to enable or enhance access to

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

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

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

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

Discussion

DPD maintains a robust pipeline of eligible HOME projects which is continually evolving. HOME funds are often provided as gap financing and most projects are contingent upon other public and private funding resources. As the HOME funding application cycle is rolling with applications accepted throughout the year, DPD brings projects to the EDAC and/or Cook County Board for individual review and consideration for approval after eligibility review and underwriting have been completed. These meetings also function as public hearings and offer an opportunity for public comment on proposed projects. DPD also requires that proposed projects have local community and municipal support before providing formal approval. While each municipal HOME Consortium member receives their own direct allocation of CDBG and/or ESG funding from HUD and develops their own Consolidated Plan and corresponding Annual Action Plan for that purpose, DPD continues to coordinate with them regarding the proposed deployment of HOME funding to address affordable housing needs throughout suburban Cook County. If the proposed project is located within the jurisdiction of a current HOME Consortium member, additional consultation occurs to ensure the proposal is aligned with local needs and priorities. HUD recently released policy guidance regarding a new protocol (Grant Based Accounting) regarding HOME funding commitment and expenditures which previously operated on a “first in, first out” protocol. These changes ensure that IDIS both commits and disburses funds on a grant specific basis, instead of using the FIFO (oldest money disbursed first) method that has been used for the Community Development Block Grant (CDBG), HOME Investment Partnerships (HOME), and Housing Opportunities for Persons With AIDS (HOPWA) Programs to date. Grant funds were already committed and disbursed in IDIS on a grant specific basis for the Emergency Solutions Grants (ESG) Program. In light of this

guidance, DPD is currently re evaluating its pipeline to determine which projects are most suitable for funding with 2023 dollars to ensure compliance with these new requirements. For these reasons, as well as the fact that the County has 4 years to commit and 5 years to expend HOME funds, a detailed 2023 HOME funding project list is not included at this time. However, as the County updates and refines this pipeline, it will consult and coordinate with HOME Consortium members as appropriate and keep HUD sufficiently informed as to the proposed usage of related dollars including but not limited to 2023 funds. Specific CDBG - DR housing goals are regularly updated through the County's CDBG - DR action plan as found here [Disaster Recovery and Resilience - CDBG-DR | CookCountyIL.gov](#). There are no current updates to Housing goals.

AP-60 Public Housing - 91.420, 91.220(h)

Introduction

HACC is the largest of the group and covers all of suburban Cook County with the exception of Cicero, Oak Park, and Park Forest. Only HACC and the Housing Authority of the Village of Oak Park own and operate public housing units. The remaining PHAs only provide tenant - based assistance.

Within the approximately 8,500 housing units within suburban Cook County, approximately 1/4th of them are PHA owned and managed, largely through HACC. Tenant based vouchers still vastly outweigh project based vouchers across all the PHAs. HUD data indicates approximately 12,500 residents hold Housing Choice Vouchers, about 1.5 percent of all households in suburban Cook County. DPD consulted frequently with local PHAs in the development of Moving To Implementation which also informed this corresponding Annual Action Plan. Related consultations included information and data sharing related to current needs, PHA capacity to fulfill related needs through physical housing unit provision, rental assistance, and provision of other services. Specifically, DPD and HACC are strong partners and collaborate often around programming and funding opportunities. Respective leadership meets weekly to discuss needs, available resources, and coordination opportunities. HACC is informed of County funded affordable housing developments as they come online for client referral purposes and the County is able to refer individuals in need of housing assistance to HACC. Several County funded projects

also have HACC project - based vouchers or are participants in the Rental Assistance Program (RAP) which allows HACC to utilize private debt to finance renovation of existing public housing. Both DPD and HACC coordinate and partner with the local Continuum of Care through the Alliance to End Homelessness in Suburban Cook County to ensure that persons who are homeless or at risk of homelessness can access PHA resources where eligible. DPD and HACC have also partnered on various competitive funding applications to bring additional resources to Cook County. Through implementation

of both the 2020 - 2024 Consolidated Plan and this corresponding 2023 Annual Action Plan, DPD will work diligently to forge equally strong relationships with the other PHAs.

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

As an outgrowth of Moving To Implementation, DPD is also exploring coordination opportunities related to integrated Section 3, Minority - and Women - owned Business Enterprise (MBE/WBE) compliance which aim to ensure access to contractual opportunities for traditionally disadvantaged businesses and individuals. Information sharing or a common database of eligible and/or certified businesses and persons could help to create significant employment opportunities for low - income and minority residents, thereby improving job access, as well as facilitate improved compliance with HUD requirements. DPD has already initiated related consultations with prospective partners including HACC,

the Chicago Housing Authority (CHA), the Chicago Cook Workforce Partnership, and City of Chicago around potential coordination. These consultations are expected to continue in PY 2023.

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

Cook County will continue to coordinate with HACC and the other local PHAs to encourage resident involvement in PHA operations and public housing property management. Previously, DPD partnered with HACC to conduct resident outreach and promote resident engagement and involvement in local strategic planning processes and community visioning charrettes. This collaboration will continue under the Annual Action Plan. The aforementioned partnership around exploration of joint Section 3 compliance systems can also help facilitate resident engagement. Cook County and HACC already share information regularly to link persons seeking housing or housing assistance with respective available resources including the Family Self Sufficiency (FSS) program which offers a path to homeownership.

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

This item is not applicable as none of the PHAs located within Cook County boundaries are designated as troubled to DPD's knowledge.

Discussion

A more robust discussion of PHA related needs, strategies, and coordination opportunities may be found in the 2020/2024 Consolidated Plan.

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

Introduction

DPD has a strong partnership with the CoC and supports its efforts via the by - name list to reach the chronically homeless. Outreach and engagement of homeless persons, especially the unsheltered, and assessment of their individual needs is incorporated in Cook County's ESG annual funding process. DPD requires all ESG funding recipient agencies to involve homeless or formerly homeless persons in policy making roles and provides guidance and technical assistance to help facilitate this engagement. As such, related levels of involvement factor into DPD scoring of their ESG funding applications and impact resulting resource allocations. Additionally, DPD will also continue to support homeless outreach activities with ESG funding under this 2023 Annual Action Plan.

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

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

DPD has a strong partnership with the CoC and supports its efforts via the by - name list to reach the chronically homeless. Outreach and engagement of homeless persons, especially the unsheltered, and assessment of their individual needs is incorporated in Cook County's ESG annual funding process. DPD requires all ESG funding recipient agencies to involve homeless or formerly homeless persons in policy making roles and provides guidance and technical assistance to help facilitate this engagement. As such, related levels of involvement factor into DPD scoring of their ESG funding applications and impact resulting resource allocations. Additionally, DPD will also continue to support homeless outreach activities with ESG funding under this 2023 Annual Action Plan.

Addressing the emergency shelter and transitional housing needs of homeless persons

Under this 2023 Annual Action Plan Cook County will aim to address the emergency shelter and transitional housing needs of homeless persons through the deployment of ESG resources to agencies that provide said housing options as noted earlier in the Project Summary.

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

Additionally, Cook County remains committed to helping homeless persons (particularly chronically

homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living as well as to shorten the period of time that individuals and families experience homelessness. Towards this end, DPD will continue to make linkages between persons in need of housing or housing assistance and available resources through the HOME and ESG programs. For example, information on available affordable housing units supported by the HOME program is made available to ESG staff that coordinates with the Alliance to disseminate related information.

Cook County will also continue to provide funding for the development of affordable housing development including but not limited to permanent supportive housing to ensure there is sufficient housing stock to meet related needs. In order to shorten the period of time that individuals and families experience homelessness, Cook County will also continue to support rapid - rehousing assistance that helps participants quickly obtain and sustain stable housing through the ESG program. Additionally, Cook County will continue to partner with the Alliance to support their Sub Cook Zero work which aims to end veteran and chronic homelessness in suburban Cook County.

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

DPD will also continue to partner with the Alliance to make sure prospective clients are referred to and provided housing and supportive services including those funded by CDBG, ESG, and HOME resources.

In

an attempt to reduce gaps in services, Cook County and the Alliance are heavily focused on facilitating coordinated entry. DPD has dedicated resources over the last four years to support the development and implementation of a formal coordinated entry system in suburban Cook, and will continue this support under this 2023 Annual Action Plan. This system helps persons who are currently homeless or at

imminent risk of homelessness access housing, services, and other resources.

Discussion

A more robust discussion of homeless - related needs, strategies, and coordination opportunities may be found in the 2020/2024 Consolidated Plan.

AP-75 Barriers to affordable housing -91.420, 91.220(j)

Introduction

As noted in Moving To Implementation, Cook County faces several barriers to affordable housing including but not limited to heavy regulation of zoning, land use, and development which varies widely by municipality, lack of awareness, understanding, and/or enforcement of fair housing requirements, increasingly high and disproportionate commercial and residential property tax burdens, rising costs of affordable housing development, and community opposition or general lack of community support for affordable housing. Identifying barriers and developing related solutions is particularly challenging given that Cook County is home to 130+ municipalities, various townships, and other jurisdictional structures. Additionally, the majority of municipalities are home - rule jurisdictions which limit County control over related policies. Reviewing regulatory barriers is challenging because they are constantly changing, as well. Most communities do not take a comprehensive, communitywide, strategic approach to land use and building codes.

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

DPD is pursuing several strategies to mitigate barriers to affordable housing. Given its role as a taxing body, the County has formed a task force to reexamine the use and availability of commercial and residential tax incentives to help mitigate related costs while promoting economic growth. Additionally, Cook County recently updated and simplified its building code which covers unincorporated areas and is hopeful that municipal jurisdictions will also adopt it for application to their communities. Under Moving

To Implementation, the County expressed interest in considering an inclusionary housing ordinance. It is

expected that during the 5 - year Consolidated Plan implementation process, Cook County will convene relevant stakeholders including public officials along with the real estate and development industries to explore this issue further. As the County continues to implement its 2012 Analysis of Impediments to Fair Housing (AIFH), it is working with the Chicago Area Fair Housing Alliance (CAFHA) to assess continuing fair housing needs, gauge current County and municipal compliance levels, and offer informational resources and technical assistance to municipalities, organizations, or individuals seeking assistance. The Cook County Human Rights Commission is also a partner in this effort. In recent years, the Commission spearheaded County inclusion of source of income in its protected classes and is currently exploring pursuit of substantial equivalency, a HUD designation that would provide them with enhanced fair housing complaint intake authority. In PY 2021, Cook County, Chicago, the Chicago Housing Authority, the Housing Authority of Cook County, and other CDBG entitlements and Public Housing Authorities in suburban Cook County started a regional Assessment of Fair Housing despite

uncertainty about the landscape related to HUD's fair housing requirements. This regional group has made great progress.

Discussion

A more robust discussion of barriers and strategies to combat them may be found in the 2020/2024 Consolidated Plan.

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

Introduction

Infrastructure remains a high priority. There is significant need for infrastructure that promotes economic development and supports public and active transportation, including better maintained bus shelters, more bicycle lanes, and safer crosswalks. The overarching goal of such improvements should be

to create a County that is less automobile dependent, shifting to transit - oriented development, and connects people with jobs. In South Cook, infrastructure projects should help attract and retain businesses and jobs. Demand exists for skilled labor training and programs for all residents, with particular emphasis upon serving low - income people, non - college bound youth, people with disabilities, women, veterans, and ex - offenders. Programs should help people obtain and retain employment in key industrial clusters. South suburban Cook in particular sees a need for strengthening workforce development near accessible transit and offering low - cost transportation options to areas of

employment. The County needs to support business development programs with additional targeting for small businesses (Federally defined as 500 employees or less), including entrepreneurial initiatives in low - and moderate - income communities and areas with high rates of unemployment. These efforts should be supplemented with tax incentives and loans targeting business owners and operators within economically depressed areas.

Cook County current taxing structure remains an issue, encouraging businesses to relocate outside of Cook County. While stakeholders discussed the importance of affordable housing, the best ways to make units available or affordable varied greatly. Numerous people brought up the mismatch between the location of affordable housing in the region and areas with access to employment. Some individuals noted that existing affordable housing is concentrated in south Cook and limited in north and west Cook. Respondents placed great importance on affordable housing development as a priority for the County, stressing that it should be targeted towards disadvantaged populations including ex offenders, seniors, people with disabilities, and unaccompanied youth. Complementary social services are needed that more effectively integrate with economic development strategies as well as supportive services linked with housing.

Actions planned to address obstacles to meeting underserved needs

There are a variety of underserved needs in Cook County that DPD aims to address as noted in Moving To Implementation and earlier in this 2023 Annual Action Plan, Moving To Implementation integrates the disparate array of geographies required by Federal regulations. The Con Plan generally covers the portions of Cook County outside of Chicago, known as suburban Cook County. Some suburban municipalities receive their own entitlement funds directly from HUD and make their own funding decisions. However, the County still coordinates with these communities. Despite the complicated geographic arrangements through which Federal funds are distributed, Moving To Implementation

recognizes the value of establishing investment priorities and implementation strategies. The plan's strategic vision can aid all jurisdictions in determining what funding sources are appropriate to implement the programs and projects desired.

Moving To Implementation is a living document, whose principles are designed to work alongside changing needs, demographics, market conditions, and resources. Using the tools available (namely taxation, regulation, and the provision of public goods), the County can influence market activity. Through its offices and departments, the County administers funds or tools such as infrastructure investments, property tax abatements, and Federal grant programs. Cook County can also use its position as a major employer, purchaser, and property owner. A cohesive and coordinated planning effort will enable DPD to deploy Federal funding more efficiently to meet countywide needs and position the County for long - term sustainable economic growth (one that is equitable and reduces jobs - housing mismatch, reinforces local tax bases, and is more resilient to future market fluctuations). Moreover, Moving To Implementation positions DPD to better address the needs of the historically underserved.

Actions planned to foster and maintain affordable housing

As noted earlier, the County will continue to support affordable housing development whether through new construction or rehabilitation to ensure appropriate access. The County also remains an active member of the Preservation Compact which is dedicated to preserving affordable housing, particularly units that are at risk of loss of affordability due to tax credit expirations. Additionally, Cook County regularly participates in an interagency coordinating group with the Illinois Housing Development Authority (IHDA) and the City of Chicago to discuss joint compliance around maintaining affordable housing and to troubleshoot struggling jointly - funded projects to ensure long - term viability.

Actions planned to reduce lead-based paint hazards

As noted in Moving To Implementation, a significant portion of the housing stock in suburban Cook County was constructed prior to 1978 and is presumed to contain lead based paint which is a public health hazard and can be particularly dangerous for small children. West and North suburban Cook County face the biggest challenge in this regard as they contain the oldest housing stock constructed prior to 1940. In developing Moving To Implementation, DPD consulted heavily with the Cook County Department of Public Health (DPH). DPH was established in 1945 and is the state - certified public health

agency for Cook County with the exception of Chicago, Evanston, Oak Park, Skokie, and Stickney Township. It serves approximately 2.5 million residents in 124 municipalities and strives to meet public health needs through effective and efficient disease prevention and health promotion programs. DPH offers an array of services to address lead based paint (LBP) hazards through its Lead Poisoning Prevention and Healthy Homes Unit. Children with blood test results of 10µg/dL and higher or with a physician's order receive an in - home LBP inspection. Those with blood test results of 20µg/dL and

higher also receive a home visit from a nurse. Through partnerships with the Community and Economic Development Association (CEDA), City of Chicago Department of Public Health, Evanston Health Department, and Illinois Department of Public Health, DPH also provides funding to qualified landlords to correct LBP hazards.

Funding is also available for local governments and non - profit organizations to expand programs to control LBP hazards in eligible housing. DPD and DPH will continue to coordinate to explore competitive funding opportunities related to LBP outreach/education, hazard reduction, and remediation. Additionally, Cook County will ensure that housing development funding recipients have knowledge of and demonstrated capacity to work with other rehabilitation resources, including the County's LBP and radon testing programs and energy efficiency programs operated by private and non - profit firms. They will need to document how they will incorporate the best practices associated with HUD's Healthy Homes program, thereby reducing environmental hazards in rehabilitated units.

Consistent with other County policies, the most effective housing rehabilitation programs would be those that link with other social services, including housing counseling. DPD will incorporate LBP requirements into its housing rehabilitation programs and ensure that related requirements regarding assumptions of lead and asbestos in pre - 1978 structures and also reflect mitigation/abatement requirements in funding application forms, policies and procedures, and written agreements. Moreover, DPD will also ensure that related requirements are articulated early and clearly and facilitate compliance throughout project development.

Actions planned to reduce the number of poverty-level families

Cook County is no exception to the national trend of the increasing suburbanization of poverty as noted by Brookings and as highlighted in the book *Confronting Suburban Poverty in America*. The County continues to partner with the Chicago Cook Workforce Partnership to connect employers and job seekers as gainful employment can play a significant role in poverty reduction. Additionally, all of DPD's programs and projects supported by CDBG, ESG, or HOME funds are intended to improve the economic, social, and housing outcomes for low and moderate - income beneficiaries which can help alleviate poverty.

Actions planned to develop institutional structure

DPD will continue to coordinate with other stakeholders including the Continuum of Care and its membership, local PHAs, CAFHA, regional planning organizations, the Chicago Cook Workforce Partnership, and others to reinforce existing institutional structures and create new frameworks for coordination to ensure that low - income and other vulnerable populations can benefit from general investment, development, planning, and service offerings.

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

service agencies

As noted in Moving To Implementation, Cook County is exploring in concert with other stakeholders the possibility of bringing a 211 social service referral system to the Chicago metropolitan region. Additionally, DPD is working with the Alliance to enhance the coordinated entry system for the homeless population.

Discussion

Broadly speaking, needs far outstrip available resources in suburban Cook County. As such, Moving To Implementation and this corresponding 2023 Annual Action Plan will help build and sustain relationships

with other entities (non - profit, for - profit, and public) to increase the resources arrayed against identified issues. As outlined in Moving To Implementation, evolving market realities and demographic changes over the past several years justify a new approach to addressing local needs.

With a particular focus on transit access, in alignment with the goals of Moving To Implementation, under this 2023 Annual Action Plan, CDBG funds will be deployed to support planning, administration, infrastructure improvements, public facilities, and social services activities.

ESG resources will support homeless prevention and intervention work through administration, outreach, shelter, and supportive services. HOME funds will be utilized to develop affordable housing. All three funding sources (CDBG, HOME, ESG) will be allocated in a targeted and coordinated manner. Cook County initiated Moving To Implementation, which also informs this corresponding 2023 Annual Action Plan, to:

- (a) Build off previous planning efforts.
- (b) Support regional initiatives .Allocate new resources .Address declining annual Federal entitlement funding. Revamp historic funding models. Take advantage of strong leadership. Seek additional resources. Respond to changing demographics and market conditions.

After the release of Planning for Progress, DPD convened 3 implementation stakeholder groups of philanthropic funders, financial institutions, workforce development providers, and major employers to delve deeper regarding related needs, resource gaps, funding and leverage options, and coordination opportunities. DPD will be identifying specific points of connection in respective work with the overarching goals of increasing efficiency, building scale, and maximizing impact.

Program Specific Requirements

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

Introduction

Please see below for detailed information regarding DPD planned implementation of various programmatic requirements.

Community Development Block Grant Program (CDBG) Reference 24 CFR 91.220(I)(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.	75.00%

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

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

HOME funds for development purposes are provided exclusively as low - interest, no - interest or deferred loans to non - profit or for - profit private developers and forgivable loans to homebuyers for down payment assistance.

Eligible applicants are developers who build affordable housing developments.

The process for soliciting and funding applications consist of marketing the HOME program on Cook County Planning and Development website (Planning and Development: Affordable Housing) (cookcountyil.gov). The website mentions Susan Campbell (Director) , and Karl Bradley (Deputy Director) as the point of contact for anyone who wants to inquire about HOME funds. Funding is based upon where is the greatest need is for residents who can benefit from affordable housing. Typically these areas must have the supporting infrastructure (public transportation, medical facilities, police and fire services, retail services, schools, etc.) to accommodate the residents in the new development. Application packages may be obtained by emailing Karl Bradley at Karl.Bradley@cookcountyil.gov, or by visiting Cook County Planning and Development at 69 W. Washington Ste. 2900 Chicago, IL 60602.

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:

Recapture Amount Limited to Net Sale Proceeds

Net Sale Proceeds shall mean the gross sales proceeds arising from a direct or indirect sale or transfer of the HOME assisted property, minus (a) the amount of any permitted senior mortgage indebtedness or any permitted refinancing thereof repaid at the time of such sale or transfer, (b) any commercially reasonable, third party brokerage fee paid by the homebuyer with respect to such sale or transfer, (c) any transfer taxes which, pursuant to applicable law, are paid by the homebuyer, (d) customary title, escrow and recording charges paid by the homebuyer, and (e) customary pro rations or credits made pursuant to the contract for such sale or transfer.

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:

Cook County utilizes recapture provisions in relation to all homebuyer activities. Related provisions are drawn from Cook County's current policies and procedures manual created in 2013 and recently updated in 2019 based on the new HOME regulation. Related requirements are also mirrored in funding recipient agreements. The full policies and procedures manual was previously shared with HUD. Related documents can be furnished upon HUD request.

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:

Cook County does not anticipate it will utilize HOME funds for this purpose as they are already quite limited.

Emergency Solutions Grant (ESG)

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

A summary of written standards was included in the Appendix to the 2020/2024 Consolidated Plan. The written standards and plan documents can be found here [Public Notices for Planning and Development | CookCountyIL.gov](#).

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

A coordinated entry system has now been developed in suburban Cook. DPD is partnered with the Continuum of Care, staffed by the Alliance to End Homelessness in Suburban Cook County and inclusive of its membership to develop this protocol. The system includes a fully staffed call center as well as four walk-in centers throughout suburban Cook. Common intake processes are used at all access points. Additional information regarding coordinated entry can also be found here http://suburbancook.org/sites/default/files/ce/Entry_Point_Operations_Manual_20190222.pdf.

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).

ESG funds are allocated based on an annual competitive funding cycle. Related funding applications and guidance are published online in the early part of the year. Funding application availability is publicized via e-blast to current and prospective applicants as well as through presentations to Continuum of Care leaders and members.

A pre application workshop is also conducted to clarify related requirements and processes. Applicant eligibility is restricted to 501(c)3 non-profit organizations serving homeless persons (and/or persons at risk of becoming homeless) in suburban Cook County. Matching funds are required, minimum and maximum funding application requests thresholds, and other restrictions also apply. DPD also coordinates with the Alliance, specifically through its Prevention Committee, to discuss anticipated funding allocation proportions by program component. These are subject to change based on available data, perceived needs, and other relevant feedback. Once applications are received they are reviewed for eligibility/capacity and related site visits are conducted. Individual and small groups of DPD staff review and rate each application based upon specified criteria resulting in an average score. Preliminary funding recommendations are then developed and subject to further review/approval by DPD senior management, and EDAC, and the Cook County Board.

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.

As noted earlier, DPD requires all ESG funding recipients to conduct outreach to and involve homeless or formerly homeless persons in policy making roles. This engagement also factors into DPD scoring of related ESG funding applications. Additionally, DPD directly supports homeless outreach activities with ESG funding.

5. Describe performance standards for evaluating ESG.

On a quarterly and annual basis, DPD tracks the following outcomes in addition to tracking overall, unduplicated numbers served: persons entering or existing, including those to known destinations including but not limited to permanent housing, and those utilizing shelter for less than 30 days. DPD requests that ESG funding recipients include reports from HMIS or the parallel tracking tool used by Domestic Violence agencies only to support related data provided. With the exception of the shelter metric which only applies to Emergency Shelter, all other data fields pertain to all ESG program components. These Performance Standards were initially developed prior to the 2012 Program Year, and they are based on the Alliance's Dashboard Data. The County is coordinating with the Alliance to come up with goals for these Performance Standards that are both ambitious and reasonable. In general, the goals are to improve performance, which would mean increasing the ratio of persons entering: exiting, increasing the percent exiting to a known destination, increasing the percent exiting to permanent housing, and increasing the percent using shelter for less than 30 days.

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

1. Distribution of Funds

- a. Describe the eligibility requirements for recipients of HTF funds (as defined in 24 CFR § 93.2).
- b. Describe the jurisdiction's application requirements for eligible recipients to apply for HTF funds.
- c. Describe the selection criteria that the jurisdiction will use to select applications submitted by eligible recipients.

d. Describe the jurisdiction's required priority for funding based on geographic distribution, which is a description of the geographic areas of the State (including areas of low-income and minority concentration) in which it will direct assistance during the ensuing program year.

e. Describe the jurisdiction's required priority for funding based on the applicant's ability to obligate HTF funds and undertake eligible activities in a timely manner.

f. Describe the jurisdiction's required priority for funding based on the extent to which rents for units in the rental project are affordable to extremely low-income families.

g. Describe the jurisdiction's required priority for funding based on the financial feasibility of the project beyond the required 30-year period.

h. Describe the jurisdiction's required priority for funding based on the merits of the application in meeting the priority housing needs of the jurisdiction (such as housing that is accessible to transit or employment centers, housing that includes green building and sustainable development features, or housing that serves special needs populations).

i. Describe the jurisdiction's required priority for funding based on the location of existing affordable housing.

j. Describe the jurisdiction's required priority for funding based on the extent to which the application makes use of non-federal funding sources.

2. Does the jurisdiction's application require the applicant to include a description of the eligible activities to be conducted with HTF funds?

3. Does the jurisdiction's application require that each eligible recipient certify that housing units assisted with HTF funds will comply with HTF requirements?

4. Performance Goals and Benchmarks. The jurisdiction has met the requirement to provide for performance goals, consistent with the jurisdiction's goals established under 24 CFR 91.215(b)(2), by including HTF in its housing goals in the housing table on the SP-45 Goals and AP-20 Annual Goals and Objectives screens.

5. Rehabilitation Standards. The jurisdiction must establish rehabilitation standards for all HTF-assisted housing rehabilitation activities that set forth the requirements that the housing must meet upon project completion. The jurisdiction's description of its standards must be in sufficient detail to determine the required rehabilitation work including methods and materials. The standards may refer to applicable codes or they may establish requirements that exceed the minimum requirements of the codes. The jurisdiction must attach its rehabilitation standards below. If the jurisdiction will not use HTF funds for the rehabilitation of housing, enter "N/A".

In addition, the rehabilitation standards must address each of the following: health and safety; major systems; lead-based paint; accessibility; disaster mitigation (where relevant); state and local codes, ordinances, and zoning requirements; Uniform Physical Condition Standards; Capital Needs Assessments (if applicable); and broadband infrastructure (if applicable).

6. Resale or Recapture Guidelines. Below, the jurisdiction must enter (or attach) a description of the guidelines that will be used for resale or recapture of HTF funds when used to assist first-time homebuyers. If the jurisdiction will not use HTF funds to assist first-time homebuyers, enter "N/A".

7. HTF Affordable Homeownership Limits. If the jurisdiction intends to use HTF funds for homebuyer assistance and does not use the HTF affordable homeownership limits for the area provided by HUD, it must determine 95 percent of the median area purchase price and set forth the information in accordance with §93.305. If the jurisdiction will not use HTF funds to assist first-time homebuyers, enter "N/A".

8. Limited Beneficiaries or Preferences. Describe how the jurisdiction will limit the beneficiaries or give preferences to a particular segment of the extremely low- or very low-income population to serve unmet needs identified in its consolidated plan or annual action plan. If the jurisdiction will not limit the

beneficiaries or give preferences to a particular segment of the extremely low- or very low-income population, enter “N/A.”

Any limitation or preference must not violate nondiscrimination requirements in § 93.350, and the jurisdiction must not limit or give preferences to students. The jurisdiction may permit rental housing owners to limit tenants or give a preference in accordance with § 93.303 only if such limitation or preference is described in the action plan.

9. Refinancing of Existing Debt. Enter or attach the jurisdiction’s refinancing guidelines below. The guidelines describe the conditions under which the jurisdiction will refinance existing rental housing project debt. The jurisdiction’s refinancing guidelines must, at minimum, demonstrate that rehabilitation is the primary eligible activity and ensure that this requirement is met by establishing a minimum level of rehabilitation per unit or a required ratio between rehabilitation and refinancing. If the jurisdiction will not refinance existing debt, enter “N/A.”

Discussion

