



## **PY 2020-2024 Consolidated Plan for Housing & Community Development**



Development Customer Services  
Neighborhood Services Division  
123 Madison Street  
Oak Park, IL 60302

**Village of Oak Park PY 2020-2024 Consolidated Plan  
For Housing & Community Development**

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## EXECUTIVE SUMMARY

The five-year Consolidated Plan for Housing and Community Development (Con Plan) is the Village of Oak Park's primary vehicle for identifying and prioritizing housing, community development and economic needs and strategies to guide the use of its entitlement funding from the U.S. Department of Housing and Urban Development (HUD). The Village receives Community Development Block Grant (CDBG) and Emergency Solutions Grant (ESG) funds annually to address needs in our community. The statutory goals of the HUD Con Plan are to provide decent housing and a suitable living environment, and expand economic opportunities, principally for low- and moderate-income persons. The Con Plan is submitted to HUD for approval following its development according to the regulations in 24 CFR Part 91, which includes consultation with community stakeholders and input from the public.

The Village of Oak Park is committed to a diverse and inclusive community that engages and encourages residents and institutions to work together to make Oak Park the most livable community for all its residents, one in which equity is realized for all citizens. To this end, the Village will continue to pursue strategies to address the housing, economic, and social service needs of low- and moderate-income residents, the homeless and special needs populations. Oak Park has established numerous tools and partnerships to address these needs.

The Con Plan process employed an expanded citizen outreach and participation process using an online (and paper) questionnaire that was promoted via email and social media, as well as by traditional methods. This process included outreach to gather feedback on priorities within the community.

It should be noted that, as it was for most persons, the COVID-19 pandemic was a huge strain on Village of Oak Park residents, and the Village has and will continue to work hard to provide resources and assistance to persons and businesses affected by COVID-19.

As noted above, the federal CDBG funds are intended to provide low- and moderate-income (LMI) households with viable communities, including decent housing, a suitable living environment, and expanded economic opportunities. Eligible activities include fair housing outreach, housing rehabilitation, public services, infrastructure improvements, code enforcement, public facilities improvements, planning and administration.

### *Lead and Responsible Agencies*

With Oak Park being a member of the Cook County HOME Consortium, the Cook County Department of Planning and Development is the lead agency for this Con Plan.

The Development Customer Services Department, Neighborhood Services Division, within the Village of Oak Park (a general-purpose unit of municipal government) administers the CDBG and ESG programs with assistance from the Finance Department. The department initiated the contracting, administration, organization and preparation of the Con Plan and will coordinate

the public, private, and nonprofit entities through which it will carry out the Con Plan. It is responsible for administering HUD funds and oversight of the Con Plan.

The Public Works Department also is involved in implementing in-house infrastructure projects. The Public Health Department also carries out a CDBG Public Services project. When necessary, the Legal Department is consulted for legal opinions and for contract issues with subrecipients.

The lead agency for the Action Plan is the Neighborhood Services Division of the Development Customer Services Department of the Village of Oak Park. The Division initiated the administration, organization and preparation of the Con Plan and the PY 2020 Action Plan, and will coordinate the public and nonprofit entities through which it will carry it out.

### *The Village of Oak Park*

The Village of Oak Park is a thriving community of approximately 52,000 people located immediately west of the city of Chicago in northeastern Illinois. The Village is noted for its diverse population and its architectural heritage, being known particularly as the place with the most Frank Lloyd Wright designated buildings anywhere in the world. Within its 4.5 square miles live one of the region's most diverse mixes of cultures, races, ethnicities, professions, lifestyles, religions, ages and incomes.

The Village operates under the Village Manager form of government. An elected legislative body of a President and six Trustees hires a professional Manager to oversee the day to day administration of government programs and services. The President and Board approve all HUD-funded projects.

## **THE PROCESS**

### **Consultation**

The Development Customer Services Department consults with a number of agencies throughout the year. Continuum of Care members, community representatives, subrecipients, and public service agencies provide input into the department's plans for HUD funding in on-going consultations and collaborations. For the Con Plan, the Village held a public meeting, hosted a roundtable meeting for stakeholders and met one-on-one with a number of them to consult about priority needs, goals, objectives and funding issues. All attendees received the Draft Con Plan and Draft PY 2020 Action Plan document during the comment period. In addition, an intensive Survey was conducted, as was a Con Plan poll that replicated the priorities setting meetings that were held earlier.

The Village of Oak Park involved public and private housing, health, mental health and service agencies in a number of ways. Between October 2019 and February 2020, the public and stakeholders attended meetings to discuss the needs in the community, how the needs are being met, and how the groups could better serve the community. In addition to the public, the

meetings involved governmental agencies, non-profit service providers and business representatives. Through these discussions, attendees identified ways to enhance coordination and collaboration, including a better communication structure, facilitating regular meetings between providers and evaluating current funding structures to ensure coordination between funders.

The Village of Oak Park works with the Alliance to End Homelessness in Suburban Cook County (Alliance), the area's Continuum of Care, and aligns its homeless priorities with the Alliance's strategic plan to ensure a coordinated response within the community, while still evaluating the needs specific to Oak Park. The Village also participates in a specific Oak Park Homeless Coalition that increases inter-agency collaboration and ensures that persons experiencing homelessness are linked to services best suited for their needs.

The Village is part of a committee of west suburban Cook County funding agencies – including the Alliance, various foundations, various townships, Cook County and the City of Berwyn – to evaluate the priorities and funding efforts in the community to ensure that services are not duplicated and needs are being addressed in the most effective way possible. The goal of the committee is to ultimately provide the most coordinated funding structure that addresses the needs of the community, including persons experiencing homelessness and other special needs. The focus is on improving the capacity and strength of west suburban Cook County non-profits, many of whom are funded by the various members of this committee.

In addition to the Con Plan Priority Needs meetings held to determine Con Plan priorities, the Village met with a variety of funders and key agencies in the community to evaluate how funds should be used to address priorities in Oak Park, including addressing homeless needs. The Alliance provided information to provide a regional expertise on how this can best be achieved. Oak Park relies on the Alliance's expertise on homeless needs in suburban Cook County, including performance standards, outcomes evaluation, and policies and procedures for the administration of the Homeless Management and Information System (HMIS), to ensure a coordinated regional effort and to provide a consistent message to all subrecipients. The Village funds an Alliance ESG HMIS activity each year that ESG is received, thereby contributing to the HMIS work that the Alliance does for communities such as Oak Park. In addition to interviewing the Alliance, the Village interviewed Housing Forward, the community's largest provider of services to persons experiencing homelessness or at risk of homelessness.

Coordination among ESG recipients is facilitated through the use Coordinated Entry (CE), which is still a relatively new process at this time. This is an important first step in developing a more coordinated process for intake and will determine targeting and prioritization for services. The Village has participated in CE discussion from the beginning, even serving on the committee that decided the structure of CE and assisting in determining which agency should be the CE Lead Agency.

*Cooperation and Coordination with Other Public Entities in the Formation of the Draft Con Plan*

Oak Park is a member of Cook County's HOME Consortium, which has led to increased cooperation and coordination with both Cook County and other consortium members. Additionally, the Village consults on a regular basis with the Oak Park Housing Authority (OPHA), the Oak Park Regional Housing Center, Oak Park Township and the Oak Park Economic Development Corporation. In the development of the Consolidated Plan, the Village held meetings and other outreach efforts, and invited public entities including neighboring municipalities, the County, local school districts, and many other agencies and organizations. The Village engaged the State of Illinois in the Consolidated Planning process. For Program Year 2020, the Village facilitated the funding of Housing Forward through the State's ESG program as Oak Park's annual allocation will be received by the State. The Village coordinated with the State, with the Continuum of Care (the Alliance), and with Housing Forward on this effort to ensure that the needs of Oak Park's homeless population continued to have access to services.

Through the Oak Park Homeless Coalition, many local agencies participate in the coordination of services to persons experiencing homelessness or at risk of homelessness. The Village has taken a leading role in ensuring a coordinated response to addressing all priorities within the Con Plan through facilitating better communication and cooperation between agencies, both those funded through the Village and those funded through other agencies.

As a designated Village partner agency, the Oak Park Regional Housing Center works closely with the Village in the implementation of fair housing plans through the Con Plan. As a subrecipient of Village CDBG funds, the agency is integral to ensuring that fair housing is being addressed throughout the community. In addition, the Oak Park Regional Housing Center serves as the designated marketing agent for the Village of Oak Park's Multi-Family Housing Incentives Program when the program is funded and operating. In this capacity, the Housing Center works to promote racially diverse and integrated buildings and neighborhoods in Oak Park. Direct services in this effort include conducting marketing and outreach to attract a racially diverse demand for Oak Park, providing counseling services to housing seekers in Oak Park, providing technical assistance to housing providers in Oak Park, and cooperating with the Village to attract building owners into the Multi-Family Housing Incentives Program.

*Priorities Setting Meetings*

The Village of Oak Park facilitated roundtable meetings with multiple agencies and conducted interviews with another ten stakeholders to discuss the needs and priorities in the community. In the public and stakeholder meetings, participants were given background information on CDBG and ESG funding, data on the relevant priority areas, and then given the opportunity to select their top priorities for low- and moderate-income persons living in the Village. A discussion was then held to determine how those needs could be addressed, how the Village should prioritize those needs, and what specific services are needed to ensure the most effective use of funds. Through these meetings, priorities emerged as the highest need. Those

are Public Services, Housing and Infrastructure for CDBG funding, Homelessness for CDBG and ESG funding; and Housing for potential HOME funds.

With regard to Public Services Con Plan priorities, the highest priorities were mental health services, fair housing, and emergency food provision and nutrition services. With regard to Homelessness Con Plan priorities, the highest priorities were homelessness prevention, emergency shelter, rapid re-housing and street outreach. With regard to Housing priorities, the highest priorities were the Small Rental Rehabilitation Program (to increase affordability for renters), the Single Family Housing Rehabilitation Loan Program (to increase affordability for homeowners), and code enforcement. With regard to Infrastructure Improvements priorities, the highest priorities were alley improvements, water main and line improvements, street improvements, and sidewalk and sidewalk ramp improvements. The Village also determined a highest priority as to prevent, prepare for, and respond to COVID-19, as well as to facilitate assistance to eligible persons economically impacted by COVID-19. Other high priorities were Economic Development, Administration and Planning, and Public Facility Improvements for CDBG funding and the Homeless Management and Information System (HMIS) for ESG.

### **Citizen Participation and Outreach**

The Village made the decision during the 2020-2024 Consolidated Planning process to encourage a high level of local public and agency consultation in an effort to demonstrate its commitment to (a) identifying priority needs and (b) engaging the participation of citizens, public agencies and nonprofit organizations in a positive and collaborative manner.

An October 9, 2019 *Wednesday Journal* legal ad on the program year (PY) 2020-2024 online Consolidated Plan survey and the PY 2020-2024 Consolidated Plan priorities setting public meeting was placed. A PY 2020-2024 online Consolidated Plan survey was open October 14-November 1, 2019. There were 190 responses.

For housing and community development stakeholders, a PY 2020-2024 Consolidated Plan priorities setting meeting was held on November 21, 2019 from 9:30 a.m. to 10:30 a.m. in Room 101 of Village Hall. For the public, a PY 2020-2024 Consolidated Plan priorities setting meeting was held on December 3, 2019 from 5-8 p.m. in Room 101 of Village Hall.

A PY 2020-2024 online Consolidated Plan Poll was open January 22-February 7, 2020. There were 90 responses. The Poll replicated a PY 2020-2024 Consolidated Plan priorities setting meeting.

Interviews were held with key persons from the following agencies and organizations: the Alliance to End Homelessness in Suburban Cook County, Beyond Hunger, Housing Forward, the Oak Park Economic Development Corporation, the Oak Park Housing Authority, Rush Oak Park Hospital, Sarah's Inn, the Village of Oak Park Health Department, the Village of Oak Park Public Works Department, and West Suburban Hospital.

On July 20, 2020, the Village Board voted on releasing the draft PY 2020-2024 Con Plan for a five-day public comment period to begin July 23, 2020. The Notice of Document Availability for the draft Con Plan (and draft PY 2020 Action Plan) was published in the *Wednesday Journal* on July 22, 2020 and advertised on the Village website, with the five-day comment period running from July 23, 2020 to 5 p.m. on July 27, 2020. After being released, the draft Con Plan was available at the Village of Oak Park Development Customer Services, 123 Madison Street, Oak Park, and on the Village's Website, on the Housing-Grants page.

## **NEEDS ASSESSMENT**

### **Overview**

HUD Comprehensive Housing Affordability Strategy (CHAS) data, American Community Survey (ACS) data, the Draft Cook County Con Plan, and the Alliance to End Homelessness in Suburban Cook County's Point-in-Time data, coupled with the feedback received through the survey, the poll, and public/stakeholder meetings, helped the Village create a framework to determine needs, which presented priorities to guide decisions in selecting projects to be funded.

### *Basic Demographics*

In Oak Park, according to 2013-2017 American Community Survey (ACS) 5-Year estimates, White residents comprised 68.6% of the population; African-American residents comprised 19.8% of the population; Asian residents comprised 4.5% of the population; and Native Hawaiian and Other Pacific Islander residents comprised 0.1% of the population. The "some other race" category and several categories of "two or more races" basically made up the remaining 7% of the population.

The ACS estimates also showed that Oak Park is 52.2% female and 47.8% male, and that the under 18 category comprises 24.7% of the population while the 65 and over category makes up 13.6% of Oak Park's population. The median age in Oak Park is 39 years, according to the estimates. In Oak Park, 94% are employed and 6% are unemployed – this is more favorable than for Cook County overall (8.7%) and for the metropolitan region (7.5%). It should be noted that the pandemic clearly has changed these unemployment percentages for the worse; though these are the most recent numbers, they are now not completely accurate.

The Chicago Metropolitan Agency for Planning (CMAP) recently released a demographic snapshot of Oak Park, mainly based on the aforementioned 2013-2017 ACS 5-Year estimates. The following characteristics were noted for Oak Park. From 2010 to 2017, the population of Oak Park rose 0.7%, which was just slightly lower than the population growth for all of Cook County. CMAP notes that Oak Park persons have a very high level of education attainment, with the largest percentage of all categories (38.4%) being "graduate or professional degree." Housing Forward and the Oak Park Homelessness Coalition found that more than five percent of Oak Park residents live in extreme poverty, making less than \$9,000 a year, and about 7,500



Oak Park residents are food insecure, meaning that they do not know where their next meal will come from.

### *Non-Homeless Special Needs*

Non-homeless, at-risk populations include seniors, persons with physical, developmental and mental health disabilities, victims of domestic violence, and persons living with HIV/AIDS. These populations require a variety of supportive services to remain safe, independent, healthy and stable. Agencies that regularly receive CDBG funds to assist such clients include Beyond Hunger, Community Support Services, Housing Forward, NAMI Metro-Suburban, Sarah's Inn and UCP-Seguin.

Using 2013-2017 ACS Estimates, the table below shows that a relatively high percentage of Oak Park residents have both an ambulatory difficulty and an independent living difficulty.

<b>Disability Characteristics, Oak Park</b>		
<b><i>Disability Type</i></b>	<b><i>Total Persons</i></b>	<b><i>Percent of Total Population</i></b>
With a hearing difficulty	1,418	2.7%
With a vision difficulty	997	1.9%
With a cognitive difficulty	1,771	3.6%
With an ambulatory difficulty	2,475	5.1%
With a self-care difficulty	867	1.8%
With an independent living difficulty	1,844	4.7%

2013-2017 ACS Estimates

### *Housing*

The Village's Housing priorities are linked with Cook County's in Oak Park's Con Plan, as the Village is a member of the Cook County HOME Consortium. The housing needs in Oak Park center on the lack of affordable units and the issues that exist for both renter and owner households.

According to the 2012-2016 Comprehensive Housing Affordability Strategy (CHAS) data, 34.6% of Oak Park households are experiencing at least one of the four housing problems (lacking complete kitchen facilities, lacking complete plumbing facilities, containing more than one person per room, and having a cost burden greater than 30%). The data showed that 72.6% of

all low- and moderate-income Oak Park households are experiencing at least one of the four housing problems. As one might expect, comparing renters and owners, housing problems are more prevalent for renter households, and especially for low- and moderate-income renter households.

Looking even deeper into one the four housing problems, the CHAS data showed that 33.5% of Oak Park households are cost burdened, of which 15.9% are severely cost burdened (spending more than 50% income on housing). The CHAS data also showed that 71.1% of all low- and moderate-income Oak Park households are experiencing a cost burden. Similar to housing problems listed above, cost burdens are more prevalent for renter households, and especially for low- and moderate-income renter households.

### **Homeless Needs**

According to the National Alliance to End Homelessness, when housing accounts for 50 percent or more of a household's resources, any unexpected financial crisis could jeopardize housing stability and lead to an increased risk of homelessness. Housing Forward – a grants subrecipient facilitating Oak Park rapid re-housing and homelessness prevention funding, as well as other projects – reports that they have trouble finding affordable housing for persons needing assistance, even with their great relationships with local landlords. Moreover, Housing Forward and the Oak Park Homelessness Coalition found that about 60 Oak Park school-age children are homeless (living with friends or relatives; sleeping on a couch, with no permanence). As noted above, they also found that more than five percent of Oak Park residents live in extreme poverty, making less than \$9,000 a year, and about 7,500 Oak Park residents are food insecure, meaning that they do not know where their next meal will come from.

Based on the number of clients served during the period October 1, 2017 to September 30, 2018 and recorded in the suburban Cook County Homeless Management and Information System, the number of clients associated with Oak Park represented 4% of the total number of clients served in suburban Cook County. This percentage includes both clients experiencing homelessness and those at-risk of experiencing homelessness. Of this 4%, approximately 0.61% percent are at risk of homelessness and 3.39% percent are homeless, though this figure also includes persons in temporary housing or permanent supportive housing.

The 2019 Point-in-Time (PIT) Homeless Survey showed that a total of 897 persons experienced homelessness, both sheltered and unsheltered in suburban Cook County. It should be noted that on the night of the PIT, the Housing Forward emergency shelter program sheltered 64 guests at the Grace Episcopal Church, which is located in Oak Park. The Alliance's count covers 131 municipalities; therefore, Oak Park represents only a small portion of the total area canvassed and correspondingly represents only a fraction of the numbers. However, the homeless population within the Village is not insignificant. Local homeless service providers indicate that persons experiencing homelessness view Oak Park as both a convenient place to stay, by virtue of its public transit connections, and as a place where they are welcome, due to the level of services available in the community and the accepting nature of the citizens. Seven

of the 10 Housing Forward emergency shelter locations are in Oak Park, though the agency has moved to a COVID-19 model in which hotels and motels are used for shelter.

The Village of Oak Park works with the Alliance, the area's Continuum of Care, and aligns its homeless priorities with the Alliance's strategic plan to ensure a coordinated response within the community, while still evaluating the needs specific to Oak Park. The Village also participates in a specific Oak Park Homeless Coalition that will increase inter-agency collaboration and ensure that persons experiencing homelessness are linked to services best suited for their needs.

The Village is part of a committee of west suburban Cook County funding agencies – including the Alliance, various foundations, various townships, Cook County, and the City of Berwyn – to evaluate the priorities and funding efforts in the community to ensure that services are not duplicated and needs are being addressed in the most effective way possible. The goal of the committee is to ultimately provide the most coordinated funding structure that addresses the needs of the community, including persons experiencing homelessness and other special needs. The focus is on improving the capacity and strength of west suburban Cook County non-profits, many of whom are funded by the various members of this committee.

In addition to the Con Plan Priority meetings held to determine Con Plan priorities, the Village linked with a variety of funders in the community to evaluate how funds are being used to address priorities in Oak Park, including addressing homeless needs. The Village also met with the Alliance through an interview, as well as with Housing Forward, the community's largest provider of services for persons experiencing homelessness or at risk of homelessness. How current funds are being utilized, what needs still remain in the community, and how future effects can be more effectively focused were discussed. Oak Park relies on the Alliance's expertise on homeless needs in suburban Cook County, including performance standards, outcomes evaluation, and policies and procedures for the administration of HMIS, to ensure a coordinated regional effort and to provide a consistent message to all subrecipients. The Village funds an Alliance ESG HMIS activity each year, thereby contributing to the HMIS work that the Alliance does for communities such as Oak Park.

Coordination among ESG recipients is facilitated through the use Coordinated Entry (CE), which is still relatively new at this time. This is an important first step in developing a more coordinated process for intake and will determine targeting and prioritization for services. The Village has participated in CE discussion from the beginning, even serving on the committee that decided the structure of CE and assisting in the choosing which agency should be the CE Lead Agency.

Note that Oak Park will not receive Emergency Solutions Grant funds for PY 2020, though the Village certainly hopes to receive the grant funds for the other program years of the Con Plan.

## **Non-Housing Community Development**

### *Overview*

Non-Housing Community Development priority needs include critical services such as improving public infrastructure and a vast array of public services, including mental health services, fair housing, and emergency food provision and nutrition services, among others. The Public Services CDBG component in Oak Park serves only low- and moderate-income persons or presumed beneficiaries. The infrastructure program primarily completes projects benefitting low- and moderate-income areas of the Village, with the exception of sidewalks and sidewalk ramps, which are completed throughout the community to improve accessibility for residents. Another priority need category in Oak Park is public facility improvements. In all categories, the Village will strive to promote and enhance equity for underserved populations.

### *Public Services*

There is a wide range of need for Public Services in Oak Park but the agencies providing services are constricted by limited resources. Many of the eligible public services received a high priority need rating from the public and stakeholders. The top three priorities that emerged through the planning process include mental health services, fair housing, and emergency food provision and nutrition services. While these were rated as the top priorities, it was noted that having a wide range of Public Services is also a high priority.

CDBG Public Services needs were determined through a combination of the following criteria: meeting the statutory requirements of the CDBG program; meeting the needs of low- and moderate-income Oak Park residents; coordination and leveraging of resources; response to expressed needs; sustainability and/or long-term impact; the ability to demonstrate measurable progress and success; and a combination of input from subrecipient agencies, other non-profit service providers, community stakeholders, and the residents of Oak Park. Demographic data was consulted, as well. Public Services was determined to be a high need as a category overall, with sub-priorities to guide the subrecipient funding process.

### *Public Infrastructure Improvements*

While the Village is constantly upgrading and maintaining infrastructure and public facilities, CDBG funding will focus on infrastructure improvements for the Village overall and within CDBG Target Areas. Improving infrastructure such as sidewalks, sidewalk ramps, streets, alleys and water lines allow for safer and more accessible mobility, particularly pedestrian mobility. The weather in the area certainly accelerates the deterioration of infrastructure.

Public Infrastructure needs were determined utilizing the following criteria: meeting the statutory requirements of the CDBG program; meeting the needs of low- and moderate-income Oak Park residents; coordination and leveraging of resources; response to expressed needs; sustainability and/or long-term impact; and a combination of input from Village of Oak Park

Public Works, subrecipient agencies, other non-profit service providers, community stakeholders, and the residents of Oak Park.

Public Infrastructure was ranked as a high priority through the consultation and citizen participation process, the Village's Comprehensive Plan, and to meet a great need due to infrastructure that is continually deteriorating.

### *Public Facility Improvements*

The Village is committed to assisting subrecipient agencies in improving their facilities, particularly those facilities that house persons with disabilities. Public Facility Improvements were identified as a high priority, as a relatively high amount of Oak Park's population is living with a disability. Coupled with the aging infrastructure, there is a need for Public Facility Improvements, particularly accessibility improvements.

The system for establishing the Public Facility needs and priorities is predicated upon the following criteria: meeting the statutory requirements of the CDBG program; meeting the needs of LMI Oak Park residents; coordination and leveraging resources; response to expressed needs; sustainability and/or long-term impact; and a combination of input from subrecipient agencies, other non-profit service providers, community stakeholders, and the residents of Oak Park. After a Con Plan meeting, UCP Seguin submitted a document that pointed out the great need for Public Facility Improvements that assist persons with disabilities in Oak Park.

### *Other Needs*

Economic development is a high priority because it will promote the vitality of Oak Park's economy in depressed areas of the community. Fostering growth in these areas will, in turn, provide greater opportunities for the Village's low and moderate-income residents. The Oak Park Section 108 Loan Program is a business loan fund focused on the expansion of businesses. Another need is Administration and Planning for CDBG funding.

## **HOUSING MARKET ANALYSIS**

### **Housing Market Analysis Overview**

The housing needs in Oak Park center on the lack of affordable units and the issues that exist for both renter and owner households. A portion of the narrative here is repeated from the Needs Assessment section above.

According to the 2012-2016 Comprehensive Housing Affordability Strategy (CHAS) data, 34.6% of Oak Park households are experiencing at least one of the four housing problems (lacking complete kitchen facilities, lacking complete plumbing facilities, containing more than one person per room, and having a cost burden greater than 30%). The data showed that 72.6% of all low- and moderate-income Oak Park households are experiencing at least one of the four

housing problems. As one might expect, comparing renters and owners, housing problems are more prevalent for renter households, and especially for low- and moderate-income renter households.

Looking even deeper into one the four housing problems, the CHAS data showed that 33.5% of Oak Park households are cost burdened, of which 15.9% are severely cost burdened (spending more than 50% income on housing). The CHAS data also showed that 71.1% of all low- and moderate-income Oak Park households are experiencing a cost burden. Similar to housing problems listed above, cost burdens are more prevalent for renter households, and especially for low- and moderate-income renter households.

Note that the Village's Housing priorities are linked with and follow Lead Agency Cook County's in the Con Plan, as the Village is a member of the Cook County HOME Consortium. This partnership and the consultation and citizen participation process, in conjunction with feedback from Village of Oak Park leadership and analysis of the data, determined three primary priorities within housing. The highest priorities were the Small Rental Rehab Program, the Single Family Rehab Loan Program, and code enforcement. The Small Rental Rehabilitation Program increases affordability for renters in multi-family buildings having seven or fewer units, and the Single Family Rehabilitation Loan Program provides zero percent loans deferred for 20 years for low- and moderate-income homeowners. Code enforcement enhances the health and safety of Oak Park's population by inspecting the local housing stock and ensuring that it is in good shape. In addition, Cook County (the HOME Consortium lead agency) has put forth the following priorities for Housing: family housing with three or more bedrooms; affordable housing preservation; supportive housing; emergency and transitional housing; and accessible housing.

### **Homeless Facilities and Services**

There is a shortage of beds for the homeless population based on the numbers in the Point-in-Time count and the number of beds by primary shelter, transitional housing and permanent housing programs. In addition to listing the number of beds needed for persons experiencing homelessness, this section lists the many services and programs that assist persons experiencing homelessness and for those at risk.

#### *Mainstream Resources*

Mainstream services are services that are offered by the non-homeless services systems that are available to support individuals experiencing homelessness. These resources complement the system of care specifically funded to target persons experiencing homelessness. While many housing and shelter programs also provide a range of health, mental health and employment services, persons experiencing homelessness also rely on other mainstream networks for such services.

A network of public and private agencies in Oak Park provide a variety of services to the homeless, ranging from prevention and outreach to comprehensive supportive services. Through referrals and coordination of services, the agencies are able to meet the health, mental health and employment needs of persons experiencing homelessness along the continuum of care.

Housing Forward case managers assist persons getting linked to mainstream services for which they may be eligible. They also have a staff person who is responsible for benefits coordination – assessing and screening clients for entitlement benefits including Medicaid and Temporary Assistance for Needy Families (TANF), SNAP/LINK card, Supplemental Security Income; employment supports from Workforce Investment Act programs; and housing subsidy programs (public housing and Housing Choice Vouchers).

Many social service programs are also offered by subrecipients of CDBG funds (and ESG funds, when obtained) in the Village to provide assistance to persons with incomes below the poverty level. For example, the Village increases family self-sufficiency by funding three agencies that prevent or ameliorate homelessness; these are Housing Forward, Sarah's Inn, and the West Cook YMCA. All three agencies provide supportive services such as job training, job placement, substance abuse treatment, case management, education (G.E.D.), day care, short-term mental health services and independent living skills. In addition, all three help promote emotional and economic independence and help create long-term change in the lives of homeless persons. Another agency that provides Mainstream Services is Beyond Hunger, which provides much more than food to its clients. The Village supports other important services by allocating the maximum amount of its annual CDBG Public Service dollars to local social service agencies.

#### *Homeless Facilities Discussion*

The homeless outreach program of Housing Forward represents the largest provision of services to the Oak Park homeless population, including the unsheltered homeless. PY 2020 CDBG (and previous and future ESG) subrecipient Housing Forward addresses a wide range of needs, including shelter, homelessness prevention, rapid re-housing and street outreach. For PY 2020, the Village arranged to have these needs funded by the State of Illinois. Street outreach services include outreach and engagement to unsheltered persons experiencing homelessness, crisis case management, and linkage to basic needs and housing services. They also provide extensive services to persons experiencing homelessness through their emergency shelter programs. The ultimate goal is to move persons to interim and permanent supportive housing. Housing Forward will reach out to homeless persons, including unsheltered persons, chronically homeless individuals and families, families with children, veterans, and unaccompanied youth. In addition to using CDBG and (usually) ESG to assist persons experiencing or at risk of homelessness, Housing Forward also uses the Continuum of Care NOFA funds. Housing Forward has been and will continue to be a leader in ably assisting persons experiencing or at risk of homelessness during the COVID-19 pandemic.

Housing Forward will assess each client's individual needs by following significantly planned and well thought out Coordinated Entry practices. The Village and Housing Forward continue to contribute toward the implementation of the Suburban Cook County Coordinated Entry (CE) system. CE is a community-wide system that standardizes and expedites the process by which people experiencing homelessness or who are at imminent risk of homelessness access shelter, housing, and homeless resources. CE is helping suburban Cook County municipalities and service providers better target the limited resources that are provided by the homeless assistance system to people who are experiencing homelessness. By standardizing the intake process across the region, by sharing information in real time, and by adopting uniform prioritization policies, homeless service agencies will be able to refer people to the right program based on their preferences and level of need.

## **Non-Housing Community Development Assets**

### *Introduction*

Oak Park is renowned for its architecture, excellent schools and multiple business districts. Major employers include West Suburban Medical Center and Rush Oak Park Hospital, as well as both School Districts - 97 and 200. Economic conditions in the area were stable up until the COVID-19 pandemic. The business community needs and will receive assistance in order to thrive. Before the pandemic, the Downtown Oak Park business district did well, but several other Village districts experienced increased vacancy rates and disinvestment. This lack of tax revenue has placed a heavy burden on property owners, and subsequently renters, which has resulted in a decreasing affordable housing stock that risks forcing low- and moderate-income residents out of the Village, as well as decreasing the diversity in the community. While providing jobs to low- and moderate-income persons is a high priority in Oak Park, encouraging business growth and thereby expanding the tax base is also a tool to relieve the tax burden on residents to ensure that housing remains affordable. During the pandemic, with the addition of CDBG-CV funds from HUD, the Village assisted residential renters and owners, businesses, and non-profit agencies.

### *Major Employment Sectors*

*Management, Business and Financial* and *Sales and Office* are the top two employment sectors for Oak Park, with the *Service* sector being number three.

### *Workforce Needs*

The primary workforce need focused on economic development, specifically on overcoming barriers to entry in the Village for businesses in order to increase employment opportunities for low- and moderate-income persons. During the pandemic, with the addition of CDBG-CV funds, the Village assisted businesses with forgivable loans, and it is likely that this assistance will continue into at least the first year of this new Oak Park Con Plan.



According to 2013-2017 American Community Survey (ACS) 5-Year estimates for Oak Park, 94% are employed and 6% are unemployed – this is more favorable than for Cook County overall (8.7%) and for the metropolitan region (7.5%). It should be noted that the pandemic clearly has changed these percentages for the worse; though these are the most recent numbers, they are now much less accurate.

One of the other barriers for businesses is the antiquated building stock. Being very old, much of the existing building stock does not meet the needs of modern businesses and therefore requires additional cost of renovation and improvement in order to be feasible for occupancy. Through the HUD Section 108 Loan Guarantee Program, the Village has a Section 108 loan fund for businesses in the amount of \$3 million. These funds will be loaned by the Village to promote businesses expansion and improvement, create and/or retain jobs, assist low- and moderate-income persons, and deliver positive economic benefits for the Village and its residents.

#### *Changes with an Economic Impact*

Over the last couple of years, the Village continued to experience strong investment in the Downtown Oak Park and Hemingway District areas of the community. It is believed that there are several other business areas of the community that need more resources to encourage revitalization, including the Roosevelt Road, North Avenue, Madison Street and Harrison Street corridors. During the pandemic, with the addition of CDBG-CV funds, the Village assisted businesses with forgivable loans, and it is likely that this assistance will continue into this new Oak Park Con Plan. Despite the effects of the pandemic, earlier there were success stories, and it is expected that there will be more in the future, as well.

#### *Skills and Education of the Current Workforce*

Oak Park is home to an overall well-educated and skilled workforce. The Chicago Metropolitan Agency for Planning (CMAP) recently released a demographic snapshot of Oak Park, mainly based on the 2013-2017 ACS 5-Year estimates. CMAP noted that Oak Park persons have a very high level of education attainment, with the largest percentage of all categories (38.4%) being “graduate or professional degree.”

As discussed previously, the majority of workers in Oak Park are employed in white-collar positions such as Management, Business and Financial, Sales and Service. The high level of jobs requiring advanced levels of education and the lack of unskilled jobs creates a bleak job market for those that are uneducated, especially for the businesses that were hit hardest by the COVID-19 pandemic. The Village is focused on ensuring diversity in employment opportunities to create jobs for both skilled and unskilled workers, which will also create a good mix of businesses in the community.

### *Workforce Training Initiatives*

The African American Christian Foundation (AACF) provides educational, vocational, and the general professional knowledge participating job seekers need to thrive in gainful and meaningful positions of secure and long-term employment. AACF services are provided on a material and an emotional level through support, encouragement and counseling to help clients adjust to the workforce and work through other personal challenges that may impede their ability to thrive personally and professionally. AACF workforce development programs assist residents of Illinois to obtain self-sufficiency. The basic career services assist walk-in clients with direct job placement services and provide career planning through workshops, on-the-job training and full-time job placement service. The program focuses on client job placement with particular emphasis on those considered to be "hard to serve." The following services are provided to clients: skills, needs, and interest assessment; career counseling and guidance; life and job readiness skills training; interviewing and resume writing preparation; development of realistic goals; matching client profiles with available jobs and job placement; transitioning into newly acquired jobs; case management; and supportive and follow-up services. AACF is a PY 2020 Subrecipient and their efforts will support the Oak Park Con Plan.

Similarly, Housing Forward has an employment readiness project that is funded each program year by Village CDBG funds. Employment Readiness provides one-on-one and group-based training in the "soft" skills necessary to become job ready and secure sustainable employment, as well as job location services to connect clients to long-term employment. Like most programs, it has been adapted to the pandemic so that there is now mainly virtual contact.

### *Local Initiatives Impacting Economic Growth*

The Chicago Metropolitan Agency for Planning (CMAP) – the official regional planning organization for the northeastern Illinois counties of Cook, DuPage, Kane, Kendall, Lake, McHenry, and Will – developed and guided implementation of *On To 2050*, a comprehensive regional plan. To address anticipated population growth of more than 2 million new residents, the plan establishes coordinated strategies that help the region's communities address transportation, housing, economic development, open space, environmental, and other quality-of-life issues. Additionally, through the HUD Section 108 Loan Guarantee Program, the Village has a Section 108 loan fund for businesses in the amount of \$3 million, which will be loaned by the Village to promote businesses expansion and improvement, create and/or retain jobs, assist low- and moderate-income persons, and deliver positive economic benefits for the Village and its residents.

### *Discussion*

Promoting Oak Park's economic prosperity and quality of life depends on a proactive approach to diversifying the economy, one that requires a concerted effort to support the strengths of existing companies and growth industries, as well as an effort to target the barriers businesses face when looking to build their company in the Village so that they are not forced to look at

alternative options. By providing assistance to businesses so that they can overcome these barriers, there will be increased job creation and opportunities, particularly for low- and moderate-income persons and less tax burden on home owners, therefore encouraging affordable housing. The ultimate goal of Oak Park is to drive diverse job creation, complement the strengths of our community, and promote a climate for growth. Once again, the Village Section 108 Business Loan Program can help, and certainly the ongoing CDBG-CV business assistance will also assist a great many firms in need.

## **Needs and Market Analysis Discussion**

### *Areas Where Low-Income Families are Concentrated*

The following are the Oak Park low- and moderate-income Census Tracts/Block Groups: 8121-1; 8123.01-2; 8125-1; 8125-2; 8125-3; 8126-2; 8126-3; 8128.01-1; 8128.01-2; 8128.02-3; 8130-1; 8131-1; 8131-4; and 8132-4. These are generally the areas where there are more multifamily buildings, which tend to have lower incomes than owner-occupied housing. See the Geographical Priorities (starting on page 22) for more information on this topic.

### *Areas Where Racial Minorities are Concentrated*

Oak Park defines areas of racial or ethnic concentration as geographical areas where the percentage of a specific minority or ethnic group is 10 percentage points higher than in the Village overall. African-American residents comprise 19.8% of the population. Therefore, an area of racial concentration includes census tracts where the percentage of African-American residents is 29.8% or higher. According to the latest American Community Survey five-year estimates, there are two census tracts that met the criteria for areas of racial concentration. These areas are: Census tract 8121 immediately to the north of census tract 8125 along the boundary of Chicago – 34.5%; and Census tract 8125 along the eastern boundary of Chicago in the central area of the Village – 31.6%. There were no other areas of racial or ethnic concentration in the Village, as of the latest federal data.

### *Characteristics of Areas Where Racial Minorities are Concentrated*

With Census tract 8121, the northern border across from the City of Chicago is North Avenue, which contains many businesses. The single family homes in the area tend to be smaller than in most other areas of Oak Park. There is a fair number of rental units in the tract, especially along Austin Boulevard, which also borders Chicago.

Census tract 8125 contains a major grocery store, Pete's Fresh Market, which replaced Dominic's Finer Foods and opened in late-2015. Census tract 8125 benefits by being close to two Green Line CTA stops, Ridgeland and Austin stations, and by being close to other amenities. There is a fair number of rental units in the tract, especially along Lake Street and along Austin Boulevard.

### *Assets of Areas Where Racial Minorities are Concentrated*

First, it should be said that the residents are the greatest asset. There are many more assets in these areas, including always being close to excellent amenities, resources and services. Residents have in close proximity great libraries and parks. Diversity of races and cultures is a great asset, as is being close to public transportation. In these areas of the Village, a resident is not far from a train that will get her to downtown Chicago and other desirable locations.

Census tract 8121 has two public elementary schools: Hatch School and Whittier School. It also contains the Anderson Playground. Not within its boundaries, but just west of its western border is Taylor Park, the largest park in Oak Park. On the eastern border is the Austin Boulevard bus line, which goes beyond Oak Park to the north and to the south. On the northern border is North Avenue, which contains many businesses. Across Augusta, the tract's southern border, is the Dole Library branch.

Census tract 8125 has one public elementary school, called Beye School. West Suburban Hospital is located within this tract. Its southwestern border contains part of Oak Park-River Forest High School. This tract contains two Green Line CTA stops: Ridgeland and Austin. It contains the Dole Library branch. As noted above, it has a major grocery store, Pete's Fresh Market. In this tract is also the promising but underutilized Chicago Avenue business district. Similar to tract 8121, on the eastern border is the Austin Boulevard bus line. Not within its boundaries, but just south of its southern border is the Stevenson Playground and Fieldhouse; also, to the south is Ridgeland Common, which contains one of the two Oak Park public pools and the only ice-skating facility in the Village, which is open all year.

### **Broadband and Resiliency**

#### *Broadband*

This section deals with broadband infrastructure and the Con Plan. HUD defines broadband infrastructure as cables, fiber optics, wiring, or other permanent (integral to the structure) infrastructure—including wireless infrastructure—as long as the installation results in broadband infrastructure in each dwelling unit meeting the Federal Communications Commission's (FCC's) definition in effect at the time the pre-construction estimates are generated. Currently, the FCC defines broadband speeds as 25 Megabits per second (Mbps) download, 3 Mbps upload.

With regard to broadband, the Village consulted with a broadband provider and a number of interested non-profit agencies and citizens after encouraging their participation in the development of the Con Plan. The emphasis was on narrowing the digital divide in Oak Park. A representative from AT&T was invited to two meetings, but she was unable to attend. A representative from Comcast did attend the November 21, 2019 Consolidated Plan meeting. He noted that a broadband provider such as Comcast has increased and expanded coverage, and said that rates are affordable for low- and moderate-income persons. He stated that the

company has special outreach efforts geared towards seniors and said that Comcast provides online training to seniors and veterans, and also to school districts. In addition, free Wi-Fi exists in many places in Oak Park, one example being McDonald's restaurants. At a December 3, 2019 Consolidated Plan meeting, a citizen participant noted that residents can use the free broadband internet service at all three Oak Park library branches. Another resident suggested that the Park District of Oak Park should offer free internet at park fieldhouses.

The Village will follow HUD regulation 81 FR 92626, which requires the installation of broadband infrastructure in all new construction, as well as substantial rehabilitations of multifamily rental. (Substantial means electrical work with estimated costs being equal or greater to 75% of the cost of complete replacement of the electrical system.) The regulation is intended to give low- and moderate-income people access and ability to participate in the digital economy, as well as to seek economic opportunity. This regulation only applies to rental properties with four or more units. If the Village were to find broadband installation to be prohibitively expensive, HUD suggests installing broadband only in the common areas (which HUD encourages either way).

### *Resiliency*

With regard to resiliency, the Village consulted with a water management provider and a number of interested non-profit agencies and citizens after encouraging their participation in the development of the Con Plan. Representatives from the Illinois Department of Natural Resources and the Illinois Department of Public Health were invited to two meetings, but they were unable to attend. A representative from the Metropolitan Water Reclamation District did attend the November 21, 2019 Consolidated Plan meeting and recommended that the Village invest in the maintenance and replacement of infrastructure. The Village has and will continue to do this. She also noted that there are grants available that could help a Village such as Oak Park; the Village will seek such grants.

The Village of Oak Park has a grant program to deal with housing flooding. This is especially vital in the northeast section of Oak Park, which is lower-lying than the rest of the Village. The Village of Oak Park Sewer Backup Protection Grant Program was established to provide financial assistance to homeowners who install systems to protect their homes from sewer backup during a heavy rain event. The program's intent is to offset a portion of the expense of modifying a building's plumbing system to prevent backflow when Village sewers are at capacity. Eligible homeowners may qualify for a grant of 50 percent of the total cost of sewer backup prevention improvements, up to a maximum of \$3,500 for installing either an overhead sewer system or a backflow prevention valve system.

At a December 3, 2019 Consolidated Plan meeting, a citizen participant suggested that the Village receive CDBG-Disaster Recovery (DR) to increase resiliency. Village staff responded to the citizen, noting that the Village has not had any natural disasters and does not qualify for CDBG-DR at this time.

## STRATEGIC PLAN

### Strategic Plan Overview

The Village of Oak Park will distribute funds that serve the needs of low- and moderate-income Oak Park persons and the most disadvantaged residents. The Village has also identified special needs individuals as those who face the greatest challenges and who should receive high priority in the expenditure of federal funds, including homeless services, mental health services, housing rehab (especially for seniors), fair housing, and emergency food provision and nutrition services.

Through the consultation and citizen participation process, needs assessment and market analysis, and by following the housing priorities and strategies listed in the Cook County Con Plan, the Village of Oak Park's priorities, goals and strategies for PY 2020-2024 were developed. Funding will be allocated in accordance with these priorities and continuously evaluated to ensure needs are being met.

To meet the priority needs of the community, the Village must work in partnership with other entities and will continue to identify and incorporate more partners. This will be accomplished through program monitoring, technical assistance, workshops and information sharing. As much as possible, the Village will strive to promote and enhance equity for underserved populations.

### Geographic Priorities

Priority CDBG funding areas, in the Village of Oak Park, include spaces where the percentage of low- and moderate-income (LMI) persons is 36.29% or higher. While the general rule is that an area benefit activity must serve an area where the concentration of LMI persons is at least 51% of the total population within the geographical boundary, Section 570.208(a)(ii) of the HUD regulations allows the "exception criteria," also referred to as the "upper quartile."

A grantee qualifies for this exception when less than one quarter of the populated block groups, in its jurisdiction, contain 51 percent or more LMI persons. HUD assesses the grantee's census block groups to determine whether a grantee qualifies to use this exception and identifies the alternative percentage the grantee may use, instead of 51 percent, for the purpose of qualifying activities under the LMI Area Benefit category. HUD uses the following steps in computing the upper quartile for a given community:

- Identifies the total number of block groups in the grantee's jurisdiction;
- Subtracts the block groups with zero persons to determine the net number of block groups in the jurisdiction;
- Arranges the remaining block groups in descending order, based on LMI residents in the block group;

- Computes the last block group in the upper quartile by multiplying the net number of block groups by 25 percent; and
- Applies the “exception criteria” if the percentage of LMI persons in the last census block group in the top quartile is less than 51 percent.

HUD determines the lowest proportion a grantee may use to qualify an area for this purpose and advises the grantee accordingly. Oak Park, as an exception jurisdiction, has been allowed 36.29%.

The following narrative describes the characteristics of Village areas.

#### *Low- and Moderate-Income Areas*

The following table presents information regarding low- and moderate-income (LMI) persons in Oak Park. LMI persons, as determined by HUD, have incomes at or below 80% of the median family income (MFI). HUD estimates determined that there were 13,580 LMI persons in Oak Park, equivalent to 26.34% of the population for whom this rate is determined.

HUD defines an LMI census block group, in the Village of Oak Park, as one in which 36.29% or more of the population have incomes of 80% or less of MFI. According to these criteria, 14 of the Village’s 53 census block groups (in nine tracts) qualify as LMI areas, as shown in the table below.

**LMI Census Block Groups**

Census Tract	Block Group	Number of LMI Persons	Universe of LMI Block Group	Percent of LMI Persons
8121	1	385	1000	38.50
8123.01	2	655	1805	36.29
8125	1	550	1145	48.03
8125	2	375	720	52.08
8125	3	380	785	48.41
8126	2	450	865	52.02
8126	3	470	1035	45.41
8128.01	1	1005	1935	51.94
8128.01	2	405	985	41.12
8128.02	3	520	1160	44.83
8130	1	300	680	44.12
8131	1	495	1000	49.50
8131	4	370	805	45.96
8132	4	330	845	39.05

Source: Latest HUD Community Planning and Development Data

### *Concentrations of Minority Persons*

The Village of Oak Park defines areas of racial or ethnic concentration as geographical areas where the percentage of a specific minority or ethnic group is 10 percentage points higher than in the Village overall.

In Oak Park, African-American residents comprise 19.8% of the population. Therefore, an area of racial concentration includes census tracts where the percentage of African-American residents is 29.8% or higher. According to the latest American Community Survey five-year estimates, there are two census tracts that met the criteria for areas of racial concentration. These areas are Census tract 8121 immediately to the north of census tract 8125 along the boundary of Chicago – 34.5%; and Census tract 8125 along the eastern boundary of Chicago in the central area of the Village – 31.6%. There were no other areas of racial or ethnic concentration in the Village, as of the latest federal data.

### *Concentrations of LMI Persons and Minority Persons*

Of the nine census tracts which contained block groups identified as LMI areas, two tracts were also noted to be areas of racial concentration. With the inclusion of the specific block groups, these areas were census tract 8121, block group 1; and census tract 8125, block groups 1, 2 and 3.

### *Summary*

Over program years 2020 to 2024, the Village will prioritize proposed projects each year that are to be carried out in LMI areas, in areas of racial concentration, and in areas of racial concentration that are also LMI areas. The Village will also strive to create, promote and enhance equity for underserved populations at every opportunity.

## **Draft PY 2020-2024 Con Plan Priorities and Strategies**

### *Introduction*

The Village of Oak Park is preparing a new Program Years 2020-2024 Consolidated Plan for Housing and Community Development (Con Plan) that will guide future decisions for allocating Community Development Block Grant (CDBG) and Emergency Solutions Grant (ESG) program funds. The Village also is a member of the Cook County HOME Consortium, and can potentially receive HOME Investment Partnership Program funds.

### *Outreach*

A PY 2020-2024 online Consolidated Plan survey was open October 14-November 1, 2019. There were 190 responses. For housing and community development stakeholders, a PY 2020-2024 Consolidated Plan priorities setting meeting was held on November 21, 2019 from 9:30



a.m. to 10:30 a.m. in Room 101 of Village Hall. For the public, a PY 2020-2024 Consolidated Plan priorities setting meeting was held on December 3, 2019 from 5-8 p.m. in Room 101 of Village Hall. A PY 2020-2024 online Consolidated Plan Poll was open January 22-February 7, 2020. There were 90 responses. The Poll replicated a PY 2020-2024 Consolidated Plan priorities setting meeting.

Interviews were held with key persons from the following agencies and organizations: the Alliance to End Homelessness in Suburban Cook County, Beyond Hunger, Housing Forward, the Oak Park Economic Development Corporation, the Oak Park Housing Authority, Rush Oak Park Hospital, Sarah's Inn, the Village of Oak Park Health Department, the Village of Oak Park Public Works Department, and West Suburban Hospital. In addition to all of these efforts, demographic information was consulted.

### *Priorities and Strategies*

After the aforementioned input from citizens and Village stakeholders, the highest priorities were found to be: Public Services, Housing and Infrastructure for CDBG funding, Homelessness for CDBG and ESG funding, and Housing for potential HOME funding from Cook County.

With regard to Public Services Con Plan subcategory priorities, the highest priorities were mental health services, fair housing, and emergency food provision and nutrition services.

With regard to Homelessness subcategory priorities, the highest priorities were homelessness prevention, emergency shelter, rapid re-housing and street outreach.

With regard to Housing subcategory priorities, the highest priorities were the Small Rental Rehab Program, the Single Family Rehab Loan Program, and code enforcement. The Small Rental Rehabilitation Program increases affordability for renters in multi-family buildings having seven or fewer units, and the Single Family Rehabilitation Loan Program provides zero percent loans deferred for 20 years for low- and moderate-income homeowners. Seniors are a high priority clientele with the Housing category. Code enforcement enhances the health and safety of Oak Park's population by inspecting the local housing stock and ensuring that it is in good shape. In addition, Cook County (the HOME Consortium lead agency) has put forth the following priorities for Housing: family housing with three or more bedrooms; affordable housing preservation; supportive housing; emergency and transitional housing; and accessible housing. Following this section, these priorities are described in detail.

With regard to Infrastructure Improvements subcategory priorities, the highest priorities were alley improvements, water mains and lines improvements, street improvements, and sidewalk and sidewalk ramp improvements.

The Village also determined a highest priority as to prevent, prepare for, and respond to COVID-19, as well as to facilitate assistance to eligible persons economically impacted by COVID-19. Other high priorities were Public Facility Improvements, Economic Development and

Administration and Planning for CDBG funding and the Homeless Management and Information System (HMIS) for ESG.

Over program years 2020 to 2024, the Village has a strategy to prioritize proposed projects each year that meet these high priorities. The Village will also strive to create, promote and enhance equity for underserved populations at every opportunity.

With regard to the aforementioned Cook County Con Plan Housing priorities, the table below describes them in more detail:

The following are the Cook County Priorities for Housing:

- **Family Housing.** The County continues to struggle to provide affordable housing units for households needing more than three bedrooms. A number of census tracts in comparatively affluent areas continue to display overcrowded housing, partly due to the lack of affordable housing units designed for families. Less than one quarter of the rental units in suburban Cook have three or more bedrooms, compared to three quarters of the owner units.
- **Affordable Housing Preservation.** Many communities, particularly in the west part and south suburban sections of Cook County, have older housing in need of rehabilitation. These units tend to be more affordable, in part, because of their age. County investments in rehabilitation will need to focus on preserving both structures and their affordability. They should also prioritize retrofitting buildings with energy efficient, climate resilient, health promoting features.
- **Supportive Housing.** The Alliance to End Homelessness in Suburban Cook County reports a significant increase in the availability of permanent supportive housing. However, it also projects a continued need for additional units. Affordable housing that provides additional services can have positive effects on residents' housing stability, mental health, stable employment outcomes, and quality of life. It can also reduce overall costs for housing providers.
- **Emergency and Transitional Housing.** The Alliance to End Homelessness in Suburban Cook County's strategic plan projects unmet need for an additional 500 units for Rapid Re-Housing. Such units play an important role in housing the homeless and those potentially homeless.
- **Accessible Housing.** Discussions with developers, service providers, disability advocates, and public housing authorities noted the ongoing need to create units that are accessible for seniors and the disabled.

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**Consolidated Plan Goal Descriptions**

1	Goal Name	Public Services <span style="float: right;">Goal: 99,005 persons served</span>
	Goal Description	Expanding the availability of and increasing access to needed services is a key goal. Services include, but are not limited to, mental health services, fair housing, and emergency food provision and nutrition services. The Village also determined a highest priority as to prevent, prepare for, and respond to COVID-19, as well as to facilitate assistance to eligible persons economically impacted by COVID-19.
2	Goal Name	Public Infrastructure <span style="float: right;">Goal: 11,750 persons served</span>
	Goal Description	Creating livable communities through improvements to public infrastructure. Maintaining and improving the quality of Oak Park’s existing infrastructure is instrumental to ensuring that residents live in a safe, clean, and decent environment, one that is free of COVID-19 threats.
3	Goal Name	Homelessness
	Goal Description	Oak Park aims to support services to prevent homelessness and to assist those currently experiencing homelessness. These services include, but are not limited to, homelessness prevention, emergency shelter, rapid re-housing, street outreach and HMIS. Facilitate assistance to persons impacted by COVID-19.
4	Goal Name	Affordable Housing <span style="float: right;">Goal: 40 housing units rehabbed</span>
	Goal Description	The Village of Oak Park aims to maintain, and improve affordable housing, both renter-occupied and owner-occupied. The highest priorities were the Small Rental Rehab Program, the Single Family Rehab Loan Program, and code enforcement. The Small Rental Rehabilitation Program increases affordability for renters in multi-family buildings having 7 or fewer units, and the Single Family Rehabilitation Loan Program provides zero percent loans deferred for 20 years for low and moderate income homeowners. Code enforcement enhances the health and safety of Oak Park’s population by inspecting the local housing stock and ensuring that it is in good shape. Facilitate assistance to persons impacted by COVID-19.
5	Goal Name	Public Facilities <span style="float: right;">Goal: 29 persons served</span>
	Goal Description	Maintaining and improving the quality of Oak Park’s exiting public facilities is instrumental to ensuring that residents have access to safe and accessible facilities, and those that are free of COVID-19 threats.
6	Goal Name	Economic Development
	Goal Description	Economic development will promote the vitality of Oak Park's economy in depressed areas of the community. Fostering growth in these areas will, in turn, provide greater opportunities for the Village's low and moderate-income residents. The Oak Park Section 108 Loan Program is a business loan fund focused on the expansion of businesses. Facilitate assistance to eligible persons economically impacted by COVID-19.
7	Goal Name	Administration and Planning
	Goal Description	Administration of the CDBG and ESG Programs by Village staff, homelessness assistance administration and planning, and fair housing administration.

**Anticipated Resources, Year 1 of the Con Plan (PY 2020)**

The Village of Oak Park CDBG allocation for PY 2020 is \$1,666,079. The Village will be adding \$461,787 in prior year, returned funds (funds that were previously returned by grant subrecipients such as Public Works because the entire allocation was not needed) for a total PY 2020 CDBG amount of \$2,127,866. A large part of this total was the PY 2019 postponement of the Public Works Engineering Alley Improvement project, funded at \$300,000. Another source is the amount of \$100,000 to be utilized for Single Family Housing Rehabilitation homeowner rehabilitation loans. These funds are part of a revolving loan fund contingency plan for housing at a time when loans are not scheduled to be paid back.

Proposed administration and planning set-asides include \$90,438 for the Oak Park Regional Housing Center, \$11,000 for Housing Forward/Oak Park Homelessness Coalition and \$230,777 for the Village of Oak Park. In addition, \$13,000 is set-aside, in the Public Services category, for the Village of Oak Park Health Department.

The proposed PY 2020 funding amount for non-profit CDBG subrecipients is as follows: \$236,911 (\$249,911 minus \$13,000 set aside for VOP Health Department) for Public Services and \$38,740 for Public Facilities and Improvements.

The remainder of the expected CDBG funding is proposed to be allocated as follows: \$376,000 for Housing; \$1,055,000 for Infrastructure; and \$75,000 for Code Enforcement.

The Single Family Housing Rehabilitation program is expected to begin the 2020 program year with no funds in repaid CDBG loans for its revolving fund. As noted above, prior year, returned funds in the amount of \$100,000 will be utilized for Single Family Housing Rehabilitation homeowner rehabilitation loans as part of a contingency plan for housing at a time when loans are not scheduled to be paid back. This amount is included in the totals listed above.

For PY 2020, the Village will not receive Emergency Solutions Grant (ESG) program funds. The Village continues to market a Section 108 loan program for businesses, in the amount of \$3 million.

**Institutional Delivery Structure**

Some gaps always exist in the institutional structure of a governing body. However, the coordination of local partnerships and networks has enabled the Village of Oak Park to overcome any gaps that once existed. Village staff works throughout the year to increase institutional structure, both within the Village and with Village partner agencies. Staff also attend relevant training and conferences, where available, on all aspects of grant and project management.

The Village government landscape is shared with Oak Park Township, the local Elementary (District 97) and High School (District 200) Districts, the Park District of Oak Park, the Oak Park

Library District and the Oak Park Housing Authority. These governmental units meet to coordinate their plans and programs.

While the Village delivers many services itself, the Village also contracts with the non-profit sector to deliver services, as is the case with the CDBG and ESG programs.

The Village participates in Alliance to End Homelessness in Suburban Cook County (Continuum of Care lead agency) meetings and events throughout the program year. The Village also collaborates with neighboring municipalities in several efforts, and works with a group of area funders in order to better coordinate services to non-profits and to increase the impact of west Cook County grants funding efforts.

The Village participates in and funds the Oak Park Homelessness Coalition, a local body with the purpose of helping persons experiencing, or at risk of, homelessness. Participants include persons from local non-profits, Oak Park Township, Oak Park Housing Authority, Oak Park Residence Corporation, Oak Park Public Library, the Park District of Oak Park and the local school districts.

Many of the Village's largest contract service providers, or "community partners," receive funding from a variety of sources. For example, the Oak Park Regional Housing Center receives federal CDBG grant funds, local Village funds, and support from members, residents and other agencies.

The Village has also identified new and innovative ways to increase the affordable housing stock by becoming a member of the Cook County HOME Consortium.

Strong links were maintained with the private sector through the Village's participation with local groups and individual business districts. To address the need for a more vibrant economy, in PY 2020 the Village will continue to make economic development a big priority by marketing a Section 108 Program in the amount of \$3 million, working with the banking sector and the Oak Park Economic Development Corporation to recruit applicants, and working with businesses that have an interest in applying for loans.

Finally, as part of the budget process, the Village Board (the governing body) receives input from the Community Development Citizens Advisory Committee (CDCAC) as to the allocation of CDBG Funds. The yearly Village Budget process is used by elected officials and staff to coordinate and allocate funding for community programs and services.

The Village of Oak Park believes that the network of agencies, organizations, programs, resources and activities operating within the Village have shown the existence of comprehensive efforts to meet the needs of Oak Park residents. Due to the efforts of the existing providers within the Village, there appear to be no gaps in service delivery toward the realization of the priorities, goals, and objectives outlined in the draft Consolidated Plan and in the draft PY 2020 Action Plan.

## Homelessness Strategy

According to the National Alliance to End Homelessness, when housing accounts for 50 percent or more of a household's resources, any unexpected financial crisis could jeopardize housing stability and lead to an increased risk of homelessness. Housing Forward – a grants subrecipient facilitating Oak Park rapid re-housing and homelessness prevention funding, as well as other projects – reports that they have trouble finding affordable housing for persons needing assistance, even with their great relationships with local landlords. Moreover, Housing Forward and the Oak Park Homelessness Coalition found that about 60 Oak Park school-age children are homeless (living with friends or relatives; sleeping on a couch, with no permanence). As noted above, they also found that more than five percent of Oak Park residents live in extreme poverty, making less than \$9,000 a year, and about 7,500 Oak Park residents are food insecure, meaning that they do not know where their next meal will come from.

Based on the number of clients served during the period October 1, 2017 to September 30, 2018 and recorded in the suburban Cook County Homeless Management and Information System (HMIS), the number of clients associated with Oak Park represented 4% of the total number of clients served in suburban Cook County. This percentage includes both clients experiencing homelessness and those at-risk of experiencing homelessness. Of this 4%, approximately 0.61% percent are at risk of homelessness and 3.39% percent are homeless, though this figure also includes persons in temporary housing or permanent supportive housing.

The 2019 Point-in-Time (PIT) Homeless Survey showed that a total of 897 persons experienced homelessness, both sheltered and unsheltered in suburban Cook County. It should be noted that on the night of the PIT, the Housing Forward emergency shelter program sheltered 64 guests at the Grace Episcopal Church, which is located in Oak Park. The Alliance's count covers 131 municipalities; therefore, Oak Park represents only a small portion of the total area canvassed and correspondingly represents only a fraction of the numbers. However, the homeless population within the Village is not insignificant. Local homeless service providers indicate that persons experiencing homelessness view Oak Park as both a convenient place to stay, by virtue of its public transit connections, and as a place where they are welcome, due to the level of services available in the community and the accepting nature of the citizens. Seven of the ten Housing Forward emergency shelter locations are in Oak Park, though the agency has moved to a COVID-19 model in which hotels and motels are used for shelter.

While there are several facilities in Oak Park that can provide shelter for persons experiencing homelessness, there is a growing need to provide supportive services in conjunction with housing, including drug and alcohol counseling, financial literacy, case management, life skills training, and job training and placement services. In addition to supportive services, emergency shelter, transitional housing, and permanent supportive housing facilities need to be sustained and expanded to continue to provide housing for persons experiencing homelessness throughout the area, and eventually contribute to the end of chronic homelessness. Oak Park

recognizes the magnitude of the need for additional homeless facilities and will continue to support and facilitate the efforts of the Alliance, including their operation of HMIS.

Presenting an accurate portrayal of Oak Park's homeless population is difficult due to the nature of homelessness and the limited scope of the PIT count. Oak Park has a large population of persons experiencing homelessness that are underrepresented, in addition to the Village being a hub for persons experiencing homelessness within the County due to its location and public transportation systems. The Village is committed to addressing homelessness locally but also within the context of the issue in the region.

The priorities for ending homelessness are based on the recognition that homelessness results from more than simply a lack of affordable housing, although providing housing is the ultimate objective. The Village participates in the Alliance and its efforts to implement their Strategic Plan. This plan reflects the best practice models that have been successfully implemented and utilizes *housing first* strategies for reducing chronic homelessness.

More recently, the Coordinated Entry (CE) system is being implemented; it is called Entry Point. This is a system in which public and private agencies work together as a consortium to procure and manage housing, provide central intake services, and deliver support services to clients through a coordinated case management system. CE is a community-wide system that standardizes and expedites the process by which people experiencing homelessness or who are at imminent risk of homelessness access shelter, housing, and homeless resources.

CE is helping suburban Cook County municipalities and assistance providers better target the limited resources that are provided by the homeless assistance system, to people who are experiencing homelessness. By standardizing the intake process across the region, by sharing information in real-time, and by adopting uniform prioritization policies, homeless service agencies will be able to refer people to the right program based on their preferences and level of need. The Village was an important part in the creation of CE, being a member of the committee that chose the CE provider for the area. Village participation also includes attending meetings on the implementation of the CE system.

With regard to draft Homelessness subcategory priorities, the highest priorities were homelessness prevention, emergency shelter, rapid re-housing and street outreach. These were determined by data, outreach and input from stakeholders and the public, as well as from interviews. Note that Oak Park will not receive Emergency Solutions Grant funds for PY 2020, though the Village certainly hopes to receive the grant funds for the other program years of the Consolidated Plan.

### **Actions to Evaluate and Reduce Lead-Based Paint Hazards**

The following activities constitute the Village's strategy to minimize exposure to, and damage from, lead-based paint.

### *Oak Park Public Health Department Efforts*

The Illinois Department of Public Health has identified all three of Oak Park's ZIP codes as high-risk ZIP codes for pediatric blood lead poisoning. High-risk ZIP codes are based on housing data and family economic status obtained from the latest census. Given the prevalence of an older housing stock in Oak Park and the corresponding probability that many of the Village's children are exposed to lead, the Village has committed to strong efforts in lead education, prevention and abatement. As a result, Oak Park children, with elevated blood levels receive local professional case management services through the Oak Park Public Health Department. The following activities constitute the Village's strategy to minimize exposure to and damage from lead-based paint.

The Village of Oak Park Department of Public Health is committed to eliminating elevated levels of lead in children in Oak Park. The Village has an agreement with the Illinois Department of Public Health to provide case management services for all children that live within the boundaries of the Village. The Health Department is considered the State's "delegate agency" for childhood lead. The Health Department participates in public awareness and education campaigns, provides nursing lead case management and will conduct environmental investigations, when required, under the Illinois Lead Poisoning Prevention Act and the Illinois Lead Poisoning Prevention Code.

Because of the age of the Village's housing stock, all of Oak Park's ZIP codes are defined as high risk for pediatric blood lead poisoning. As a result, every physician licensed to practice medicine is required to provide annual testing of children from six months of age through six years of age. In addition, child care facilities must require that all parents or guardians of a child six months through six years of age provide a statement from a physician or health care provider as proof that a blood test occurred prior to admission. Physicians are required to submit lead sampling results to the Illinois Department of Public Health, where the sampling data is then entered into a data surveillance system called *HLPPS*. The Health Department's Nursing Division is responsible for reviewing incoming blood lead sample test results using the *HLPPS* data management system. Nursing staff review incoming lead results to determine whether nursing case management is required and/or whether a childhood lead case should be referred to the Environmental Health Division for an environmental investigation of the child's dwelling.

The Health Department is responsible for managing and maintaining *HLPPS*. In PY 2020 and beyond, the Health Department will manage childhood blood lead test results through *HLPPS*.

Nursing Case Management – Case management of children begins at 5 µg/dl on all children six years of age and under. Children with a lead level at or above 5 µg/dl are at risk of decreased IQ, behavior problems, poor grades in school and growth delays. The case manager is responsible for contacting the parent and providing case management, including:



- Interviewing the parent or guardian regarding the child’s behavior, habits and general health;
- Emphasizing the importance of follow-up lead screening to make sure levels do not increase;
- Providing the parent with educational brochures from the “Get the Lead Out” series;
- Referring all cases for a developmental screening;
- Routine case follow-up until the child’s lead levels reach a safe level; and
- Referring the case to the Health Department’s Environmental Health Division for environmental investigation/assessment.

An environmental investigation/assessment is conducted when a child six years of age and younger has a confirmed lead blood lead level of 5 µg/dl or above. Environmental investigations are conducted by one or more of the Health Department’s Licensed Lead Assessors. Dwelling investigations are conducted in accordance with the Illinois Lead Poisoning Prevention Code and the Lead Poisoning Prevention Act. Each investigation includes a visual assessment, a dwelling diagram, an interview of the parent and, if applicable, collecting dust and/or wipe samples to determine if any lead hazards exist. The results of the investigation are shared with the parent and the property owner. If lead hazards are found, the property owner is required to submit a plan to mitigate and/or abate all lead hazards. Case follow-up is conducted to determine compliance with State laws. Cases will be closed if the lead hazards are mitigated or abated. If lead hazards are not mitigated or abated within specific time frames, the case will be referred to the Illinois Attorney General and/or the Cook County State’s Attorney for prosecution.

#### *Federally Assisted Housing Programs/Activities to Reduce Lead Hazards*

Since HUD implemented new, more stringent lead-based paint regulations in 2001, the Village’s Single Family Rehabilitation (SFR) program, and all other housing projects assisted with CDBG funding, have adhered to these requirements.

Housing Programs staff will continue to advise prospective loan recipients about lead-based paint issues and any required corrective action or construction. The SFR program will continue to incorporate lead hazard reduction in its applicable activities for rehabilitation of owner-occupied LMI properties, using CDBG and Cook County dollars.

Staff will continue to keep current in asbestos and lead hazard reduction training opportunities, and in recruiting certified contractors to bid on this work. Village staff will also notify applicants who may receive CDBG funds of the requirements of lead-based paint hazard reduction and mandate compliance as a condition of funding housing activities. Activities will be closely monitored for adherence to the regulations.

The Village’s process for lead paint hazard reduction will include hiring general contractors with licensed workers or subcontractors to perform the lead hazard reduction construction work. A

specification-writing software system, that includes lead reduction work, is in place. If warranted, relocation assistance will be provided.

Lead inspections and environmental reviews will be conducted on the activities. The lead and general rehab specifications will be written and the jobs will be bid. Preconstruction meetings will be held and the work will be completed.

## **Anti-Poverty Strategy**

### *Introduction*

Oak Park's anti-poverty strategy is focused on providing support to and fostering the development of at-risk individuals and families. Multiple programs and policies exist that are meant to assist those struggling with poverty.

The Village is committed to eliminating poverty through making housing more affordable, preserving the condition and availability of existing housing stock and helping citizens build assets of all kinds: human, social, financial, physical and natural. To this end, the Village and its community partners have incorporated an integrated system of services and programs to meet the various needs of individuals as they progress toward financial self-sufficiency.

In addition to supporting the initiatives of local organizations that serve low-income residents by providing emergency shelter, rapid re-housing and social services, the Village of Oak Park administers programs that aim to mitigate poverty and the problems associated with it. The Village can directly impact some of poverty's primary causal factors – poor-quality housing, expensive housing, lack of education, unemployment, low income and ill health – by utilizing its resources, including housing stock, social services provided by subrecipients, employment opportunities, public health guidance and the educational system. The multiple aspects of the programs run by the Village or its subrecipients, when working in concert, have the ability to reduce the number of households with incomes below the poverty level and to realize equity. Components of the Village's anti-poverty strategy are the following.

### *Housing*

A lack of affordable housing places housing cost burdens on low- to moderate-income persons, limiting their ability to pay for other goods and services, such as quality education or needed prescriptions. The Village's housing efforts are aimed at improving and maintaining a high standard of housing quality while also creating or maintaining affordability. The Village's Single-Family Housing Rehab program helps lower-income owners make much-needed repairs, which enables them to remain in their affordable homes.

Over the five-year period of the Consolidated Plan, the Village will also work closely with agencies that provide expanded housing options to current and potential Oak Park residents. These agencies include the Oak Park Housing Authority, the Oak Park Residence Corporation

and the Oak Park Regional Housing Center, all of which assist many lower-income renters, including those with disabilities.

### *Social Services*

The Village's Public Health Department provides information and programs to assist persons of lower income with health and dental issues. As a certified health department in Illinois, the Oak Park Public Health Department assists persons with lower incomes by providing Local Health Protection services such as communicable disease prevention and surveillance, HIV/AIDS counseling and case management, consultation services with local schools, inspection of licensed day care centers, emergency preparedness, assistance completing applications for Access to Care, and referral for specific public health and dental services. The department also has a PY 2020 CDBG activity that will improve the nutrition of low and moderate income persons. All of these programs helped low income persons obtain basic health care and quality of life services.

Many social service programs are also offered by subrecipients of CDBG and ESG funds in the Village to provide assistance to persons with incomes below the poverty level. For example, the Village increases family self-sufficiency by funding three agencies that prevent or ameliorate homelessness. These are Housing Forward, Sarah's Inn, and the West Cook YMCA. All three agencies provide supportive services such as job training, job placement, substance abuse treatment, case management, education (G.E.D.), day care, short-term mental health services and independent living skills. Many other agencies offer some of these services. The Village supports other important services by allocating the nearly all of its annual public service dollars to local social service agencies.

### *Economic Development*

Recognizing that property taxes can increase the cost of housing and affect the Village's ability to provide affordable housing, several years ago the Village initiated a major effort to promote new commercial development to ease the reliance on residential property taxes. The Village offers a couple of economic development programs designed to enhance local business activity. Examples include the façade improvement program and the Village's efforts to increase the number of minority- and women-owned businesses doing business with the Village, as well as its encouragement of major partner agencies (the Oak Park Regional Housing Center, the Oak Park Economic Development Corporation and the Oak Park Residence Corporation/Oak Park Housing Authority) to increase the number of MBE/WBE contracts awarded. The Village-funded Oak Park Economic Development Corporation works on business retention and economic development expansion throughout the village. The creation of good jobs locally will increase employment opportunities, giving low-income residents a chance to increase their incomes.

### *Coordination*

The Village's poverty-reducing goals, programs, and policies work to provide support and develop at-risk individuals and families. The Con Plan serves as the framework for the Village and service providers to adhere to in order to address the needs of the community. A coordinated approach to addressing the needs of the community will be accomplished through consultation with the Con Plan and the Development Customer Services Department. Poverty reduction is tied to multiple aspects of this plan and the various affordable housing strategies and other initiatives put forth will work towards reducing the number of families and individuals facing poverty. The Village will strive for an equitable allocation of resources over the Con Plan period and will continue to assist those affected by the pandemic.

### **Monitoring of Activities**

The Village of Oak Park has standards and procedures to evaluate its own performance in meeting the goals and objectives outlined in the Action Plan, as well as ensuring the adequate performance of subrecipients each program year.

### *Administrative Monitoring*

The Village reports its performance in the annual Comprehensive Annual Performance and Evaluation Report (CAPER). The CAPER contains a summary of program year accomplishments, the status of activities taken to fulfill the strategic plan component of the Consolidated Plan, and an evaluation of progress made to address identified priority needs and objectives during the program year.

### *Subrecipient Monitoring*

The Village of Oak Park maintains a high standard in compliance and monitoring for CDBG and ESG subrecipients.

The Village uses an extensive monitoring standard and format for on-site monitoring, involving several layers of examination in the areas of project/program management, internal controls, beneficiary review and service, and financial records and tracking. The monitoring standards and procedures used by the Village of Oak Park follow the standards and procedures set forth in HUD monitoring handbooks, guidelines and technical assistance publications, and follow a risk-analysis approach.

Additional meetings and technical assistance are provided for subrecipients as needed or requested to ensure compliance and improve the timeliness of expenditures. Throughout the program year, subrecipients are urged to spend and request funds in a timely manner.

Village staff tracks the progress of projects, calling to inquire about progress if inconsistencies arise. Forty days before the end of each program year, the Village sends a letter to

subrecipients reminding them that project expenses must be incurred before the end of the program year and that requests for payment must be received within 30 days after the program year's end.

Finally, every CDBG program subrecipient submits quarterly reports describing activities of the previous quarter. The reports are required in order to draw down funds. Subrecipients also submit an annual report at the end of the program year, summarizing the events and numbers of the entire program year. All of these reports require extensive documentation of project progress and beneficiaries, as well as items to be reported quarterly and annually in the Integrated Disbursement and Information System (IDIS). IDIS is a HUD-administered financial and programmatic grants information management system, connected nationally through the Internet. The system is a mandatory reporting instrument, which was first accessed by the Village of Oak Park in 1998.

With the annual progress reports that are submitted by subrecipients, if the target goal is not met by a subrecipient, they are required to provide a detailed reason. In addition, subrecipients are also required to list all other funding sources for the project. Analyzing these reports enables the Village to better and more frequently assess how it is meeting the goals and objectives listed in each Action Plan.

### **Public Housing Strategy**

The Oak Park Housing Authority (OPHA) is an Illinois municipal corporation established in 1946 to provide very-low income households and families of all ages, races and backgrounds with affordable, safe, and sanitary housing while complying with HUD Federal Regulations and working within the Village of Oak Park's housing values, policies and standards.

OPHA is governed by a seven-member board of commissioners appointed by the Village President. The commissioners all must be residents of Oak Park. The commissioners have sole authority over policy and finances and operate the Authority within the legal framework created by Congress and the governing regulations formulated by the U.S. Department of Housing and Urban Development.

OPHA has been categorized by HUD as a high-performer and is not designated as "troubled." An executive director and staff manage the operations of OPHA, which shares some management and financial staff with the non-for-profit Oak Park Residence Corporation (the Residence Corporation manages the 74-unit Oaks Building and the 21-unit Ryan Farrelly Apartments). Under 24 CFR 903, OPHA is considered a small public housing agency due to the fact that it owns less than 250 public housing units.

OPHA handles the ongoing operation and maintenance of the 198-unit Mills Park Tower and the ongoing administration of the Federal Housing Choice Voucher (HCV) Program. The Federally-funded HCV program provided rent subsidies that enable income-qualified participants to lease privately-owned rental housing. OPHA manages the 198 one-bedroom

units in Mills Park Tower, a residence building comprised of 188 elderly persons and 10 persons with disabilities. The units are in good condition, and OPHA does not expect any units to be lost from the inventory. The results from the Section 504 Needs Assessment of Mills Park Tower determined that the building is accessible.

Mills Park Tower's remodeled ground floor contains laundry facilities, a community room and a library. Recently, OPHA added a protective awning to the rear entrance to protect the seniors from the poor weather conditions when entering and exiting the building. OPHA also modernized 21 unit bathrooms with new showers, sinks, medicine cabinets, mirrors, water-saving toilets, grab bars, and lighting fixtures. Future work includes the replacement of baseboard heaters, electrical/mechanical and painting/caulking improvements, exterior waterproofing and the replacement of the building roof. OPHA has and will continue to increase the number of accessible units to meet HUD's Uniform Federal Accessibility Standards.

OPHA also conducts several actions for resident involvement in the management of public housing. OPHA receives direction from two Resident Advisory Boards – one for Mills Park Tower and one for the HCV Program. OPHA provides regular commitments with the elected council of Mills Park Tower. Building management solicits advice from this group for future facility improvements, coordination of OPHA subsidized entertainment, and policies concerning tenant-managed entertainment and other operational aspects of the facility. OPHA budgets funds in support of these key tenant initiatives.

### **Other Strategic Plan Narrative**

#### *Assessment of Fair Housing*

With Cook County Government serving as the lead agency along with Enterprise Community Partners, the Village is participating in a regional Assessment of Fair Housing (AFH) Plan. The effort is ongoing and was severely delayed by the COVID-19 pandemic. It is expected that the AFH will be submitted to HUD later this year.