

# County of Cook, Illinois



## Substantial Amendment to the 2021 Annual Action Plan

**Toni Preckwinkle, President  
Cook County Board of Commissioners**

*Prepared by:*

**The Department of Planning and Development of the  
Bureau of Economic Development**

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Public Comments and Cook County Responses:

To be inserted upon conclusion of the 15 day public comment period.

Economic Development Advisory Council (EDAC) Approval:

The amendment above will be presented to EDAC for approval March 22,2023. Related documentation will be inserted upon conclusion of the EDAC approvals.

## SUMMARY

The Cook County Department of Planning and Development (CCDPD) within the Bureau of Economic Development proposes a Substantial Amendment to its 2021 Annual Action Plan, and the completion of the HOME-ARP Allocation Plan. The HOME-ARP Allocation Plan propose new HOME-ARP funded activities to provide housing solutions for Homeless and At-Risk populations in Suburban Cook County.

## SUBSTANTIAL AMENDMENT NARRATIVE

Cook County has received a special Allocation of HOME Investment Partnership – American Rescue Plan (HOME-ARP) funding in the amount of \$23,837,306 for the purpose of developing housing solutions for Homeless and At-Risk populations in Suburban Cook County.

### Use of HOME-ARP Funding

	Funding Amount	Percent of the Grant	Statutory Limit
Supportive Services	\$ 0		
Acquisition and Development of Non-Congregate Shelters	\$ 12,157,026		
Tenant Based Rental Assistance (TBRA)	\$ 0		
Development of Affordable Rental Housing	\$ 8,104,684		
Non-Profit Operating	\$ 0	# %	5%
Non-Profit Capacity Building	\$ 0	# %	5%
Administration and Planning	\$ 3,575,595	# %	15%
<b>Total HOME ARP Allocation</b>	<b>\$ 23,837,306</b>		

### Proposed Amendment #1

Project Type	Acquisition and Development Non-Congregate Shelter; Development of Affordable Housing; and Administration and Planning
Initial Funding Amount	\$1,191,865.30
Funding Balance	\$22,645,440.70
Proposed Change	Development of HOME-ARP Allocation Plan
Additional Comments	See attached HOME-ARP Allocation Plan for further details and proposed funding allocation of Balance and Grant

<p><b>Project Scope</b></p>	<p><b>The funding is primarily to assist four distinct qualifying populations:</b></p> <p>Homeless as defined in 24CFR 91.5  At Risk of Homelessness as defined in 24 CFR 91.5  Fleeing, or Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking, as defined by HUD in the Notice  Other populations requiring services or housing assistance to prevent homelessness and other populations at greatest risk of housing instability, as defined by HUD in the Notice</p> <p><b>Eligible activities include:</b></p> <p>Supportive Services  Acquisition and Development of Non-Congregate Shelters  Tenant Based Rental Assistance (TBRA)  Development of Affordable Rental Housing Non-Profit Operating  Non-Profit Capacity Building  Administration and Planning</p>
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**APPENDIX 1 - STAKEHOLDER CONSULTATION AND CITIZEN PARTICIPATION**

***Public Comment Notice***

See attached.

***Public Comments and Cook County Responses***

To be inserted upon conclusion of the 15 day public comment period.

***Economic Development Advisory Council (EDAC) Approval***

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# DRAFT

## Cook County HOME-ARP Allocation Plan (HUD Template with Guidance)

*All guidance in this template, including questions and tables, reflect requirements for the HOME-ARP allocation plan, as described in Notice CPD-21-10: Requirements of the Use of Funds in the HOME-American Rescue Plan Program, unless noted as optional. As the requirements highlighted in this template are not exhaustive, please refer to the Notice for a full description of the allocation plan requirements as well as instructions for submitting the plan, the SF-424, SF-424B, SF-424D, and the certifications.*

*References to “the ARP” mean the HOME-ARP statute at section 3205 of the American Rescue Plan Act of 2021 (P.L. 117-2).*

*Please note: Cook County’s Response is reflect in a different font (Calibri 11pt)*

### Consultation

In accordance with Section V.A of the Notice (page 13), before developing its HOME-ARP allocation plan, at a minimum, a PJ must consult with:

- CoC(s) serving the jurisdiction’s geographic area,
- homeless service providers,
- domestic violence service providers,
- veterans’ groups,
- public housing agencies (PHAs),
- public agencies that address the needs of the qualifying populations, and
- public or private organizations that address fair housing, civil rights, and the needs of persons with disabilities.

State PJs are not required to consult with every PHA or CoC within the state’s boundaries; however, local PJs must consult with all PHAs (including statewide or regional PHAs) and CoCs serving the jurisdiction.

### Template:

#### ***Describe the consultation process including methods used and dates of consultation:***

Cook County has been consulting with our housing and homeless services providers since March of 2020 when the Corona Virus pandemic began. As it became clear that the County would be receiving a special allocation of HOME (HOME/ARP), these conversations increased to weekly sessions and workshops led by the Alliance to End Homelessness and their members. All sessions were held virtually.

The Suburban Cook community relied on donated space in churches and synagogues to provide rotating, seasonal, emergency shelter to people experiencing homelessness, known as PADS (Public Action to Deliver Shelter). This type of shelter represented over 70% of our community's emergency shelter capacity before the pandemic and was practically eliminated due to the pandemic.

Subject matter of discussions with the Alliance dealt with the loss of the PADS Facilities, increased homelessness and a long-term plan to eradicate homelessness.

DPD management consulted virtually on Microsoft Teams with all the organizations listed under "organizations consulted". The calls focused on the Plan to End Homelessness in Cook County via the development of a service model and portfolio of physical shelter assets. Specific calls also discussed resources, including potential HOME ARP, and their potential uses. Specific meetings listed below focused on the use of HOME/ARP and CDBG-CV and ESG-CV as resources to fixed site shelters and other plan components. The Shelter Planning Calls focused on the various ways the HOME ARP grant could be allocated. These calls were conducted on the following dates:

03/03/2022; 03/17/2022; 04/07/2022; 05/05/2022; 06/02/2022;  
06/16/2022; 07/07/2022; 07/28/2022; 09/01/2022; 09/29/2022;  
10/06/2022; 10/27/2022; 11/17/2022; 12/01/2022; 02/01/2023; and  
02/16/2023.

Additional virtual sessions, phone conversations and email correspondence were utilized to gather breadth to the understanding of the Homeless market and the need for services and facilities.

Key data additions were submitted by the Alliance to End Homelessness (Alliance) in the form of a commissioned study, "Shelter Redesign Plan" expanding their *Vision for Shelter in Suburban Cook County*, examining the landscape and metrics of the shelter provision amongst housing and service providers in the Alliance.

Cook County's Department of Planning and Development convened discussions with other large Participating Jurisdictions (PJs), including LA County, Seattle and Harris County (Houston), Dallas/Fort Worth (Dallas and Tarrant Counties), the State of Texas and the State of IL, evaluating best practices in addressing homelessness and funding matrices.

Participating in many of our research calls was The Housing Authority of Cook County, who also administered our Emergency Rental Assistance Program which addressed dire rental scenarios, staving off homelessness during the ongoing and post-pandemic environment.

The Chart below illustrates the meetings where Cook County's HOME/ARP and CDBG-CV grant allocations were discussed.

***List of Organizations Consulted:***

<b>Agency/Org Consulted</b>	<b>Type of Agency/Org</b>	<b>Method of Consultation</b>	<b>Feedback and Priorities</b>
Cook County Sherriff's Office	Public Agency that addresses the needs of all the qualifying populations	Teams, Email, Phone	<ul style="list-style-type: none"> <li>• Being able to potentially target the population that cycles in and out of the jail (including our Frequently Impacted Pop)</li> <li>• Homeless systems and hospitals, critical to locate near City line.</li> <li>• Work with social service agencies capable of attaining Medicaid resources for residents.</li> </ul>
Alliance to End Homelessness (CoC serving suburban Cook County)	CoC addresses the needs of all the qualifying populations including individuals, youth, veterans, domestic violence survivors, , etc.	Listening Session, Coordinated Meetings, Electronic Communications	<p><u>Clutch Consulting: Shelter Analysis Recommendations Report (10/14/21):</u></p> <p>Replace shelter loss during Covid:</p> <p>564 units of new or reconfigured shelter (~648 beds)</p> <ul style="list-style-type: none"> <li>• 522 beds for individuals</li> <li>• 42 units for families (~126 beds)</li> <li>• North: 171 beds for individuals, 14 family units that can accommodate families of any size</li> <li>• West: 141 beds for individuals, 11 family units that can accommodate families of any size</li> <li>• South: 210 beds for individuals, 17 family units that can accommodate families of any size</li> </ul> <p><i>2022 Point in Time Count:</i></p> <ul style="list-style-type: none"> <li>• 1,096 people are experiencing homelessness on any given night in suburban Cook County</li> <li>• 997 people in shelter or transitional housing</li> <li>• 99 people experiencing unsheltered homelessness.</li> <li>• 22% are chronically homeless (242 persons)</li> <li>• 2% are Veterans (20 persons)</li> <li>• 47% are in households with children (512 persons)</li> </ul>

			<ul style="list-style-type: none"> <li>• Housing Choice Vouchers or other rental subsidies to stabilize households that are extremely rent-burdened.</li> <li>• Greater access to mental health and substance abuse services</li> <li>• Priority 1: Establishing permanent transitional facilities.</li> <li>• Priority 2: Financial modeling that supports 100% transitional developments.</li> <li>• Institutionalizing model of forward assistance from shelters, stabilizing and placing those within shelter environment in shorter duration</li> <li>• Strengthening the PSH long term housing models that provide needed services for population.</li> </ul>
Connections for the Homeless	Homeless Service provider – all qualifying populations	Listening Session, Coordinated Meetings, Electronic Communications	<ul style="list-style-type: none"> <li>• Immediate shelter is needed-- additional 40 to 50 beds in Evanston, since there is nowhere for people to go when they are in crisis; law enforcement doesn't have any place to bring individuals; must send people to Chicago for fixed-site shelter.</li> <li>• Began sheltering people in the Margarita Inn in March 2020, filled the rooms in two days, and then occupied Orrington Hotel with 200 beds.</li> <li>• Provided 24/7 support, re-deployed staff, didn't shut down drop-in centers.</li> <li>• Deployed ESG-CV and CDBG-CV for rapid re-housing rental assistance to move households from hotels to housing.</li> <li>• Consolidated work at Margarita Inn (40 rooms, 60 people) with the objective to transition households from shelter to housing; temporary.</li> <li>• Limited ARPA funding from IDHS for "Supportive Housing" that includes services and financial assistance for full continuum of housing services (shelter, prevention, rapid re-housing, supportive housing, etc.).</li> <li>• Need additional mental health care supports; not enough permanent supportive housing to be able to quickly</li> </ul>



			<p>transition people from shelter to housing (particularly site based PSH).</p> <ul style="list-style-type: none"> <li>• Need expansion of services for those receiving Housing Choice Vouchers including wraparound services for mental health care and supportive services.</li> </ul>
Cook County Health and Hospital System (CCHHS)	Public Agency addressing the needs of the homeless – All Qualifying Populations	Listening Session, Coordinated Meetings, Electronic Communications	<ul style="list-style-type: none"> <li>• Invested in Flexible Housing Pool for patients experiencing homelessness to connect to permanent supportive housing (PSH).</li> <li>• Housed nearly 500 individuals in partnership with County Care.</li> <li>• Partnered with Housing Authority of Cook County (HACC) to provide vouchers to individuals in suburban Cook.</li> <li>• Developed the Rise Center – a medical respite center in partnership with Housing Forward to be able to serve patients exiting Cook County Health to continue to receive medical care and interim housing.</li> <li>• Interested in maintaining the Rise Center with possible expansion).</li> <li>• Near west location ideal for proximity to CCHHS, Hines VA and other medical providers.</li> </ul>
Housing Forward	Homeless Service provider – all qualifying populations	Listening Session, Coordinated Meetings, Electronic Communications	<ul style="list-style-type: none"> <li>• Moved clients to three hotels and consolidated into one hotel to start interim housing.</li> <li>• Priority to continue to operate interim housing.</li> <li>• Need expanded funding under County ARPA funds.</li> <li>• Continue Partnership with DPD and CCHHS respite (see above).</li> </ul>
Respond Now	Homeless Service provider – all qualifying populations	Listening Session, Coordinated Meetings, Electronic Communications	<ul style="list-style-type: none"> <li>• During pandemic took on 40 participants in hotel-based shelter at 2 motels, now operate with about 20 participants in hotel-based shelter.</li> <li>• The ability to better assist homeless people, people at risk of being</li> </ul>

			<p>homeless, or experiencing housing instability.</p> <ul style="list-style-type: none"> <li>• Stability is impeded by the shortage of motel beds and requires more engagement with motel owners to be able to provide motel vouchers for emergency shelter.</li> <li>• Need more partners and better-quality options.</li> </ul>
South Suburban Pads	Homeless Service providers – all qualifying populations	Listening Session, Coordinated Meetings, Electronic Communications	<ul style="list-style-type: none"> <li>• In March 2020, closed church-based shelter and moved everyone to hotel rooms; began with 40 hotel rooms, currently at about 60 hotel rooms serving 120 - 150 people each night; provided PPE and health care resources and vaccines; provided on-site vaccinations to keep all healthy.</li> </ul>
Journeys  The Road Home	Homeless Service Provider	Microsoft Teams	<ul style="list-style-type: none"> <li>• We need more affordable housing and shelter dollars especially for the homeless population.</li> <li>• Regarding Congregate Shelter Updates, Journey’s indicated they are providing 5 nights a week rotating shelter, with registration at HOPE Day Center.</li> </ul>
Catholic Charities	Homeless Services Provider/Domestic Services Provider/Veteran Service Provider and At-Risk of Being Homeless	Microsoft Teams	<ul style="list-style-type: none"> <li>• Break down barriers for accessing services.</li> <li>• Government needs to stop expecting organizations to stop homelessness or provide more funding to end crisis.</li> </ul>
Housing Authority of Cook County (HACC)	Public Housing Agency (PHA)	Teams Meetings	<ul style="list-style-type: none"> <li>• Willing to work with County on providing additional funding for fixed-site shelter.</li> <li>• Served as County’s Program Manager for Emergency Rental Assistance.</li> </ul>

			<ul style="list-style-type: none"> <li>• Developer of Affordable Housing Units.</li> </ul>
Chicago Area Fair Housing Alliance (CAFHA)	Advocacy Agency for Fair Housing	Teams Meeting	<ul style="list-style-type: none"> <li>• Working on collaborations and monitoring program.</li> <li>• Wants to make sure we follow Fair Housing Guidelines.</li> <li>• Currently working with County on AFFH Plan.</li> </ul>

*Summarize feedback received and results of upfront consultation with these entities:*

Consultations and meetings centered on the need for new types of shelter beyond the PADS model. At consultations and in meetings we discussed:

- Reimagining the PADS sheltering approach. Participants expressed the need for new types of shelter beyond the PADS model. Discussion centered around fixed site and hotel shelter.
- Exploring dormitory or non-congregate living environments for single adults especially veterans experiencing homelessness
- Exploring the use of agency-leased apartments for families experiencing homelessness
- Providing tailored crisis and housing supports to meet distinct needs of domestic violence survivors.
- The Alliance and its membership have been instrumental in attaining a line item consideration in the State of Illinois budget process to support long term operations, services and administrative needs of the transitional housing programs. This is key as funding for operating and delivering the required services is a key missing element and of great concern to potential operators, funders and service providers.
- Collaborating with the Housing Authority of Cook County on funding fixed-site shelter units.

In conclusion, all partners consistently pointed out the need for more permanent affordable housing beyond the PADS model as well as additional funding to meet the needs of the homeless population.

## **Public Participation**

In accordance with Section V.B of the Notice (page 13), PJs must provide for and encourage citizen participation in the development of the HOME-ARP allocation plan. Before submission of the plan, PJs must provide residents with reasonable notice and an opportunity to comment on the proposed HOME-ARP allocation plan of **no less than 15 calendar days**. The PJ must follow its adopted requirements for “reasonable notice and an opportunity to comment” for plan amendments in its current citizen participation plan. In addition, PJs must hold **at least one public hearing** during the development of the HOME-ARP allocation plan and prior to submission.

PJs are required to make the following information available to the public:

- The amount of HOME-ARP the PJ will receive, and
- The range of activities the PJ may undertake.

Throughout the HOME-ARP allocation plan public participation process, the PJ must follow its applicable fair housing and civil rights requirements and procedures for effective communication, accessibility, and reasonable accommodation for persons with disabilities and providing meaningful access to participation by limited English proficient (LEP) residents that are in its current citizen participation plan as required by 24 CFR 91.105 and 91.115.

**Template:**

***Describe the public participation process, including information about and the dates of the public comment period and public hearing(s) held during the development of the plan:***

- Date(s) of public notice: 3/12/2023
- Public comment period: start date 3/12/2023  
end date - 3/27/2023
- Date(s) of public hearings: 3/16/2023 10:30 a.m.  
3/22/2023 8:00 a.m.

***Describe the public participation process:***

<ul style="list-style-type: none"> <li>• Plan Publication in <u>Chicago Tribune</u> March 12, 2023</li> <li>• Public Comment Period will extend from March 12 to March 27, 2023</li> <li>• Public Notice will include announcement of Virtual Public Hearings on 3/16/2023 and 3/22/2023. All public comments will be addressed at the public hearings and incorporated into the plan as an addendum. The 2<sup>nd</sup> public hearing will take place during the public meeting of the Cook County Economic Development Advisory Committee (EDAC) on 3/22/2023. The EDAC is the County’s formally recognized public body that addresses federal entitlement planning and resources, including Performance Reviews, Consolidated Plans, Action Plans and amendments or modifications.</li> </ul>

**Copy of Public Notice:**

Cook County 2021 Annual Action Plan Amendment  
HUD Entitlement Grant Funds /HOME-ARP Allocation Plan  
Public Hearing and Public Comment Notice

*Draft Substantial Amendments to the 2021 Annual Action Plan/HOME-ARP Allocation Plan*

The Cook County Department of Planning and Development (CCDPD) within the Bureau of Economic Development is accepting public comments regarding its Draft Substantial Amendment to its 2021 Annual Action Plan, and the completion of the HOME-ARP Allocation Plan which propose new HOME- ARP funded activities to better meet community development needs in suburban Cook County.

Applicable Public Comment Period: *15 Days – March 12th, 2023 – March 27th, 2023*

Public Comment Opportunities

An important part of the process of developing a Substantial Amendment is to promote citizen participation and solicit input. The Draft Substantial Amendment to the 2021 Annual Action Plan/ HOME-ARP Allocation Plan may be reviewed on-line at the Cook County website during the applicable public comment period specified above at this link:

<https://www.cookcountyil.gov/service/public-notices-planning-and-development-0>

All interested parties are encouraged to provide written comments. Written comments for the Draft Substantial Amendment to the 2021 Annual Action Plan/ HOME- ARP Allocation Plan are being accepted during the applicable public comment period specified above and must be received by 4 p.m. on the last day of the aforementioned public comment period in order to receive consideration.

Written comments must be directed to Karl Bradley, Deputy Director, Cook County Department of Planning and Development, 69 West Washington, Suite 2900, Chicago, IL 60602,

[Karl.Bradley@cookcountyil.gov](mailto:Karl.Bradley@cookcountyil.gov).

Public Hearing Invite

An important part of the process of developing a Draft Substantial Amendment to the 2021 Annual Action Plan/ HOME-ARP Allocation Plan is to promote citizen participation and solicit input. In addition to submitted public comments, Cook County is inviting the Public to attend either or both of the Microsoft Teams virtual public hearings below:

March 16th, 2023 at 10:30 am – 11:30 am Public Hearing # 1 Details regarding the Draft Substantial Amendment to the 2021 Annual Action Plan/HOME-ARP Allocation Plan will be presented. The public is invited to ask questions and submit comments on the HOME-ARP Allocation Plan which amends the 2021 Annual Action Plan. To attend the Public Hearing, please dial 1-872-215-6022 and enter Phone Conference ID 470554806#.

March 22nd, 2023, at 8:00 am – 9:30 am Public Hearing # 2 Details regarding the Draft Substantial Amendment to the 2021 Annual Action Plan/ HOME-ARP Allocation Plan will be presented to the Cook County Economic Development Advisory Committee. The public is invited to ask questions and submit public comments. To attend the public hearing, please dial 1-872-215-6022 and enter Phone Conference ID 557622737#.

A Spanish version of the Substantial Amendment to the 2021 Annual Action Plan/ HOME-ARP Allocation Plan will be available on Cook County’s website during the week of March 13, 2023 at the below link:

<https://www.cookcountyl.gov/service/public-notice-planning-and-development-0>

For Citizens who require additional accommodations and/or language translations please contact Deputy Director Karl Bradley at [Karl.Bradley@CookCountyil.gov](mailto:Karl.Bradley@CookCountyil.gov). Phone number 312-603-1000.

***Describe efforts to broaden public participation.***

- Routine Website updates on website in response to comments
- Posted Meeting Notice in Spanish Language
- Presentation and status update to the Economic Development Advisory Committee (Public Meeting)
- Email communication of Plan to industry and service providers, stakeholders, and elected offices, seeking additional comment

***Summarize the comments and recommendations received through the public participation process either in writing, or orally at a public hearing:***

Comments to be added upon completion of public hearings and public comment period.

***Summarize any comments or recommendations not accepted and state the reasons why:***

Comments to be added upon completion of public hearings and public comment period.

## Needs Assessment and Gaps Analysis

In accordance with Section V.C.1 of the Notice (page 14), a PJ must evaluate the size and demographic composition of **all four** of the qualifying populations within its boundaries and assess the unmet needs of each of those populations. If the PJ does not evaluate the needs of one of the qualifying populations, then the PJ has not completed their Needs Assessment and Gaps Analysis. In addition, a PJ must identify any gaps within its current shelter and housing inventory as well as the service delivery system. A PJ should use current data, including point in time count, housing inventory count, or other data available through CoCs, and consultations with service providers to quantify the individuals and families in the qualifying populations and their need for additional housing, shelter, or services.

### **Template:**

#### **OPTIONAL Homeless Needs Inventory and Gap Analysis Table**

<b>Homeless</b>													
	<b>Current Inventory</b>					<b>Homeless Population</b>				<b>Gap Analysis</b>			
	<b>Family</b>		<b>Adults Only</b>		<b>Vets</b>	<b>Family HH (at least 1 child)</b>	<b>Adult HH (w/o child)</b>	<b>Vets</b>	<b>Victims of DV</b>	<b>Family</b>		<b>Adults Only</b>	
	<b># of Beds</b>	<b># of Units</b>	<b># of Beds</b>	<b># of Units</b>	<b># of Beds</b>					<b># of Beds</b>	<b># of Units</b>	<b># of Beds</b>	<b># of Units</b>
Emergency Shelter	225	56	362	0	6								
Transitional Housing	214	77	101	0	0								
Permanent Supportive Housing	453	123	1022	#	762								
Other Permanent Housing	244	122	180	#	16								
Sheltered Homeless						157	512	20	118				
Unsheltered Homeless						#	99	0	1				
<b>Current Gap</b>										624	221	1119	1119

**Data Sources:** 1. Point in Time Count - 2022 <https://suburbancook.org/wp-content/uploads/2022/05/2022-Fact-Sheet.pdf>,  
 2. HUD 2022 Continuum of Care Homeless Assistance Program Housing Inventory County Report [https://files.hudexchange.info/reports/published/CoC\\_HIC\\_CoC\\_IL-511-2022\\_IL\\_2022.pdf](https://files.hudexchange.info/reports/published/CoC_HIC_CoC_IL-511-2022_IL_2022.pdf)

**OPTIONAL Housing Needs Inventory and Gap Analysis Table**

<b>Non-Homeless</b>			
	<b>Current Inventory</b>	<b>Level of Need</b>	<b>Gap Analysis</b>
	# of Units	# of Households	# of Households
Total Rental Units	849,525		
Rental Units Affordable to HH at 30% AMI (At-Risk of Homelessness)	84,953		
Rental Units Affordable to HH at 50% AMI (Other Populations)	307,528		
0%-30% AMI Renter HH w/ 1 or more severe housing problems (At-Risk of Homelessness)		199,765	
30%-50% AMI Renter HH w/ 1 or more severe housing problems (Other Populations)		116,010	
<b>Current Gaps</b>			114,813

**Data Sources:** 1. Housing Needs Assessment Report

[https://www.policymap.com/report\\_widget?type=fur&area=predefined&sid=10192&pid=696961170](https://www.policymap.com/report_widget?type=fur&area=predefined&sid=10192&pid=696961170)

2. Comprehensive Housing Affordability Strategy (CHAS) <https://www.huduser.gov/PORTAL/datasets/cp.html>

**Describe the size and demographic composition of qualifying populations within the PJ’s boundaries:**

***Homeless as defined in 24 CFR 91.5***

- Homeless, as defined in Suburban Cook County, is primarily a homeless individual, Black and/or if a household then headed by a woman.
- Data gathered from the Cook County’s Point in Time Count (PIT) for 2022.
- PIT had total of 1096 homeless individuals.
  - 738 in Emergency Shelter
  - 259 in Transitional Housing
  - 99 Unsheltered.
- 725 households:
  - 568 Without Children
  - 157 with at least one adult and one child.
- Gender breakdown:
  - 498 Female
  - 592 Male
  - 3 Transgender
  - 1 non-conforming
  - 2 Questioning.
- Racial breakdown:
  - 613 Black
  - 410 White



- 8 Asian
- 5 American Indian or Alaska Native
- 6 Native Hawaiian or other Pacific Islander
- 54 Multiple Races
- Ethnic breakdown:
  - 166 Hispanic/ Latino
  - 930 Non-Hispanic/ Non-Latino.

***At Risk of Homelessness as defined in 24 CFR 91.5***

At Risk Households are defined as two populations under 24 CFR 91.5:

1. 0%-30% AMI Renter HH w/ 1 or more severe housing problems
2. 30%-50% AMI Renter HH w/ 1 or more severe housing problems

- Low income and Housing cost burden is a significant issue in Cook County.
- CHAS data shows:
  - 370,135 households at or below 30% HUD Area Median Family Income.
  - 339,880 household are severely cost burdened (cost burden >50%)
  - 404,600 households have severe housing problems. The four severe housing problems are: incomplete kitchen facilities, incomplete plumbing facilities, more than 1 persons per room, and cost burden greater than 30%

***Fleeing, or Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking, as defined by HUD in the Notice***

- PIT shows 119 victims of domestic violence having homelessness problem.
  - 70 in Emergency Shelter
  - 48 in Transitional Housing
  - 1 Unsheltered.

***Other populations requiring services or housing assistance to prevent homelessness and other populations at greatest risk of housing instability, as defined by HUD in the Notice***

- 274,395 households between 30% to 50% HUD Area Median Family Income.
- 347,095 households are cost burdened (cost burden >30% to < 50%)
- 735,220 households have severe housing problems. The four severe housing problems are: incomplete kitchen facilities, incomplete plumbing facilities, more than 1.5 persons per room, and cost burden greater than 50%

**Identify and consider the current resources available to assist qualifying populations, including congregate and non-congregate shelter units, supportive services, TBRA, and affordable and permanent supportive rental housing (Optional):**

Resources to support Affordable Housing Initiatives		
Funding Sources	Nature of Funding	Interval
HOME Program	Entitlement Funding for Affordable Housing (Capped at 80% AMI)	Annual Entitlement
HOME ARPA	Entitlement Funding for Housing affecting Homeless and Near Homeless populations	One-Time Allocation
ERA I	Emergency Rental Assistance	One-Time Allocation
ERA II	Emergency Rental Assistance	One-Time Allocation
ERA II IDHS	Emergency Rental Assistance	One-Time Allocation
ARPA PSH	County ARPA Designation supporting extension of Permanent Supportive Housing	One-Time Allocation
ARPA Transitional Housing	County ARPA Designation supporting development of Transitional Housing	One-Time Allocation
CDBG CV Capital Funding	Entitlement Funding supporting transitional housing development and Operations	One-Time Allocation
Community Development Block Grants	Entitlement Funding supporting housing agency development and offices	Annual
Emergency Service Grants	Entitlement Funding supporting transitional housing for residents, relocation, and stability	Annual
Low Income Housing Tax Credits	State of Illinois LIHTC Annual Credit Award	Annual
State of IL Line-Item Budget	Operating and Administrative support to Homeless Agencies and Facilities (State Bill – add Hyper link)	Annual (Under Consideration)

**Describe the unmet housing and service needs of qualifying populations:**

***Homeless as defined in 24 CFR 91.5***

Critical to the Homeless population is the provision of physical space to provide respite. As the County transitions from an overnight shelter model, more transitional housing allowing for longer stays are needed. To accommodate this currently unmet need, the County is supporting the acquisition and development of physical spaces in the form of non-congregant shelter.

Secondary, is the need to develop low-income units allowing for the housing of families and individuals identified as Homeless, or very-low income to provide a natural transition to stability. At present, the high demand and low supply of affordable housing units, has created a marketplace where people at 50% of AMI are occupying units normally available to households at 30% or less of AMI. The competitive nature of the market, as explained in the following sections will consume the units designated and preserved for previously Homeless households.

***At Risk of Homelessness as defined in 24 CFR 91.5***

Cook County appears to have an excess of units targeted to households with incomes less than 50% of AMI. Approximately 307,528 units are designated for the population with income less than 50% AMI, while there are 116,010 Households within the income range of 30-50% of AMI.

Public incentive programs over the past 30 years have created an over-supply of units available to 50% or less AMI rather than targeting 0-30% AMI exclusively. 30-50% AMI targeting focused on 30% AMI or less, requires a deeper subsidy, normally with HUD project or individual vouchers required to support residency.

In the less than 30% AMI range only 84,933 units are supplied for the 199,763 Households yielding a housing deficiency of 114,813 units. Residents in the 0-30% range are forced to take a higher rent unit, say the oversupply at 50% and under, effectively paying a high percentage of their income in the form of rent. The above standard of delivering broad and general affordability to lower income households has left a significant gap in the affordability bubble in Cook County when you consider the second population of at-risk households, those with incomes below 30% AMI.

This deficiency of targeted and preserved low-income units provides a barrier for families attempting to avoid homelessness and those exiting homelessness. The intense demand for units in low supply stifles households attempting to attain stability. Households must face the challenge of taking on a higher income unit, in many cases committing more than 50% of their income to the provision of housing, leaving limited discretionary household income and placing families under intense pressure to maintain rent payments when life decisions hit.

Sourcing an affordable unit within the suburban areas, as well as Northwest Indiana, is an increasing trend as families are priced out of the Chicago metropolitan area. Thus, access to affordable housing now becomes a regional concern.

As we consider the populations at risk of becoming Homeless, the impact of COVID 19 further destabilized housing security, as families were forced to address both economic and medical hardships. As unemployment increased, wages plummeted, and people lost their

housing. Households forced to seek shelter in congregate settings were now exposed to serious illness, which led to the abandonment of the PADs model for transient housing.

The shift in work, albeit it temporary to an at-home or remote model, disproportionately affected lower and moderate- income households dependent upon tourist, retail, and entertainment industries. Households had minimal resources to survive weeks, let alone months of unemployment and decreased wages until either industry reengaged or they transitioned to more viable jobs.

Evident in this is the effective number of households who sought Emergency Rental Assistance under federal and local (County/Municipal) programs. In Suburban Cook County alone, more than 18,000 households were supported by rental assistance averaging six months of support to either remain stably housed or stave off eviction during the past two years (2021-2022). The necessity to support these households only demonstrates the pressure households are under in this income category. Limited means and resources to save for the “rainy day”, limited supply of affordable housing, regional competition for those affordable units on the market and a rapidly diminishing supply of affordable units, relative to the population and need, increased both mental and economic pressure on households to remain stably housed.

***Fleeing, or Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking, as defined by HUD in the Notice***

Cook County recognizes this qualifying population in the point in time count of homeless in suburban Cook County and is working to gather more information from our partners in this area in order to speak about their distinct needs. Law Enforcement partners shared they lack enough shelters in the suburbs where these victims may seek refuge and services and subsequently need to direct them to facilities in the City of Chicago.

***Other populations requiring services or housing assistance to prevent homelessness and other populations at greatest risk of housing instability as defined by HUD in the Notice***

Recognizing the many factors that contribute to the rapid change a household may experience between being stably housed to becoming homelessness, within this region leads us to the conclusion that our methods of documenting and identifying the homelessness within suburban Cook are challenging at any point in time, even given the commitment and expertise of the agencies, governments and institutions working to eradicate homelessness. Nevertheless, there remain three basic principles applicable to all qualifying populations of homeless and those at risk of being homeless:

- The very-low-income stock of housing is severely deficient to support the demand for affordability at 30% AMI Level.
- Increasingly, there is regional pressure on the 50% AMI targeted units with increased housing expenses in the overall region.
- Ancillary populations are under extreme risk of homelessness as acquiring affordable units are outside their means and timing.

***Identify any gaps within the current shelter and housing inventory as well as the service delivery system:***

The current level of shelter provision is absent long-term physical spaces to house the Homeless in crisis. This is the largest gap in the delivery system as the County is starting with minimal fixed site shelters.

While ongoing activities to acquire and transition Hotel and Commercial spaces are underway, this remains an interim step to the long-term development of transitional Housing assets for the delivery of Homeless Services.

The County has adequate social service delivery with a mature social service provider network; plus, a coordinated funding network, including Cook County and State of Illinois entitlement funding and CoC funding for residential services. Service delivery is both coordinated on- site and mobile to deliver to remote sites such as individual homes and small developments, under 12 units.

Long-term funding to support the development of transitional housing sites is the key missing element. While the State of Illinois is currently considering ways to fund supportive care and operations of shelter sites, Pjs without dedicated streams of income or revenue to support the operations face a difficult task of development and ensuring long term viability without risking the underlying capital and value of the Community Development Organizations undertaking the operations.

***Under Section IV.4.2.ii.G of the HOME-ARP Notice, a PJ may provide additional characteristics associated with instability and increased risk of homelessness in their HOME-ARP allocation plan. These characteristics will further refine the definition of “other populations” that are “At Greatest Risk of Housing Instability,” as established in the HOME-ARP Notice. If including these characteristics, identify them here:***

Cost-burdened households present another group with an increased risk of homelessness. These households pay more than 30% of their income to housing expenses and comprise a pool of 339,880 households. During the pandemic this population was particularly stressed to

maintain stable housing. Absent the availability of rental assistance resources from the Federal and County level, increased evictions and homelessness would have been the result.

During the past three years, Cook County ran an Emergency Rental Assistance Program. The program assisted 18,436 households with \$168,706,999 in direct payment assistance. The majority of these residents earned less than 30% of the County's AMI and all resided in suburban Cook County. This represented just under 5% of the households in this income group further supporting the fact that there remains enormous pressure in the affordable housing sector to provide assistance and affordable dwelling units which provide housing stability.

***Identify priority needs for qualifying populations:***

Itemize what the PRIORITY needs are for all the populations of homeless –

- Transitional Housing developments to support homeless households in crisis. The ability to stably house residents in crisis as they transition to stability with the assistance of mental, physical and financial professionals to support long term stability.
- The provision of services must be either onsite or local to allow both access and confidence accessing the services is within a safe, trusted location.
- Pipeline of affordable housing to begin placing households permanently in affordable, safe and marketable units to further stabilize households and families. The provision of housing remains the top asset to support individual and family stability, health, job retention and continuing education.

***Explain how the PJ determined the level of need and gaps in the PJ's shelter and housing inventory and service delivery systems based on the data presented in the plan:***

During the Covid 19 Pandemic, Cook County paid to house unsheltered homeless residents in hotels, who previously had occupied congregate facilities or who were living on the streets. In order for the County to transition from this hotel/motel overnight emergency model; permanent housing must be developed to house people in transition from homelessness to housing stability.

Since March 2020, the County has funded over \$7,000,000 for over 8,000 room nights in more than seven hotels at any point in time within suburban Cook County. Data collected from this effort revealed the average length of stay in these properties between 30 to 180 days due to the lack of viable low-income housing to support transition to stability. This expensive model is unsustainable and reveals the demand for additional affordable units in the market place as out placement relied on vacancy in established affordable and PSH developments..

Also, the data presented in the Gap Analysis on page # 10, reveals, the most critical need is the development of physical assets (transitional housing buildings - units/beds); including the

expansion of very-low-income housing, specifically targeted to households below 30% AMI, given the gap on supply and high demand for the units in the region.

## **HOME-ARP Activities**

### **Template:**

***Describe the method(s) that will be used for soliciting applications for funding and/or selecting developers, service providers, subrecipients and/or contractors:***

Cook County will issue RFP(s) in coordination with the Illinois Housing Development Authority's Tax Credit and Permanent Supportive Housing cycles (usually twice a year). The County RFP will offer incentive financing to support homeless and affordable unit production in housing types and locations supporting transitional shelter housing and permanent supportive housing. Developers with units identified for people under 30% AMI or at risk for homelessness, or homeless; will receive up to \$50,000/ homeless unit.

***Describe whether the PJ will administer eligible activities directly:***

The County will fully administer the HOME ARP Program, identifying developers and overseeing the rehab. and construction work and provide long term monitoring of operations. HOME/ARP funds will be used exclusively to produce affordable housing and for the purchase/development of non-congregate shelters/transitional housing.

***If any portion of the PJ's HOME-ARP administrative funds are provided to a subrecipient or contractor prior to HUD's acceptance of the HOME-ARP allocation plan because the subrecipient or contractor is responsible for the administration of the PJ's entire HOME-ARP grant, identify the subrecipient or contractor and describe its role and responsibilities in administering all of the PJ's HOME-ARP program:***

Not Applicable (N/A).

In accordance with Section V.C.2. of the Notice (page 4), PJs must indicate the amount of HOME-ARP funding that is planned for each eligible HOME-ARP activity type and demonstrate that any planned funding for nonprofit organization operating assistance, nonprofit capacity building, and administrative costs is within HOME-ARP limits.

**Use of HOME-ARP Funding**

	<b>Funding Amount</b>	<b>Percent of the Grant</b>	<b>Statutory Limit</b>
Supportive Services	\$ 0		
Acquisition and Development of Non-Congregate Shelters	\$ 12,157,026		
Tenant Based Rental Assistance (TBRA)	\$ 0		
Development of Affordable Rental Housing	\$ 8,104,684		
Non-Profit Operating	\$ 0	# %	5%
Non-Profit Capacity Building	\$ 0	# %	5%
Administration and Planning	\$ 3,575,595	# %	15%
<b>Total HOME ARP Allocation</b>	<b>\$ 23,837,306</b>		

***Describe how the PJ will distribute HOME-ARP funds in accordance with its priority needs.***

1. 60% of HOME ARP funds for Award will be dedicated to the development of non-congregate shelter housing. As Suburban Cook has minimal physical assets to support emergency and crisis shelter and the demonstrated shortcomings of the PADs model, acquisition and development of physical buildings to respectfully house individuals and families transitioning to stability is the primary requirement.
2. 40% of HOME ARP funds for Award will be dedicated to the development of affordable housing that can reach down to households at 30% AMI, inclusive but not limited to PSH development, as the County attempts to extend affordability and access throughout the County. Included in this dispersion is a recognition that people of color comprise an inordinate share of the Homeless and long- term stability is tied to proximity of community of origin and familial supports.

***Describe how the characteristics of the shelter and housing inventory, service delivery system, and the needs identified in the gap analysis provided a rationale for the plan to fund eligible activities:***

Cook County lacks a portfolio of transitional housing assets. Our funding reflects the acquisition of properties for shelters that may be rehabbed/constructed to meet the needs of homeless households and begin to provide permanent affordable options for long term stable housing in the competitive market environment. The consortium of Service Providers within Suburban Cook is mature to provide services, as described above, developing assets to support their long-term transitional models on both sides of their stabilizing services serves to build a lasting continuum.



## **HOME-ARP Production Housing Goals**

### **Template**

***Estimate the number of affordable rental housing units for qualifying populations that the PJ will produce or support with its HOME-ARP allocation:***

410 total dwelling units :

- 250 transitional shelter units.
- 160 affordable housing (targeting 30-50% AMI)

***Describe the specific affordable rental housing production goal that the PJ hopes to achieve and describe how the production goal will address the PJ's priority needs:***

The priority needs are for the most vulnerable population (less than 30% AMI) and population at risk of homelessness.

Both goals enumerated above will address this need.

All qualifying populations of homeless will be eligible. Geographic distribution will be limited to suburban Cook County jurisdictions – South, North and West.

**Preferences** – Cook County will not designate any preferences at this time as we believe our goal of assisting the population between 0 – 30% AMI with transitional housing and 30-50% AMI for additional affordable housing units is comprehensive and will allow us to address many homeless needs simultaneously.

A preference provides a priority for the selection of applicants who fall into a specific QP or category (e.g., elderly or persons with disabilities) within a QP (i.e., subpopulation) to receive assistance. A *preference* permits an eligible applicant that qualifies for a PJ-adopted preference to be selected for HOME-ARP assistance before another eligible applicant that does not qualify for a preference. A *method of prioritization* is the process by which a PJ determines how two or more eligible applicants qualifying for the same or different preferences are selected for HOME-ARP assistance. For example, in a project with a preference for chronically homeless, all eligible QP applicants are selected in chronological order for a HOME-ARP rental project except that eligible QP applicants that qualify for the preference of chronically homeless are selected for occupancy based on length of time they have been homeless before eligible QP applicants who do not qualify for the preference of chronically homeless.

Please note that HUD has also described a method of prioritization in other HUD guidance. Section I.C.4 of Notice CPD-17-01 describes Prioritization in CoC CE as follows:

“Prioritization. In the context of the coordinated entry process, HUD uses the term “Prioritization” to refer to the coordinated entry-specific process by which all persons in need of assistance who use coordinated entry are ranked in order of priority. The coordinated entry prioritization policies are established by the CoC with input from all community stakeholders and must ensure that ESG projects are able to serve clients in accordance with written standards that are established under 24 CFR 576.400(e). In addition, the coordinated entry process must, to the maximum extent feasible, ensure that people with more severe service needs and levels of vulnerability are prioritized for housing and homeless assistance before those with less severe service needs and lower levels of vulnerability. Regardless of how prioritization decisions are implemented, the prioritization process must follow the requirements in Section II.B.3. and Section I.D. of this Notice.”

If a PJ is using a CE that has a method of prioritization described in CPD-17-01, then a PJ has preferences and a method of prioritizing those preferences. These must be described in the HOME-ARP allocation plan in order to comply with the requirements of Section IV.C.2 (page 10) of the HOME-ARP Notice.

In accordance with Section V.C.4 of the Notice (page 15), the HOME-ARP allocation plan must identify whether the PJ intends to give a preference to one or more qualifying populations or a subpopulation within one or more qualifying populations for any eligible activity or project.

- Preferences cannot violate any applicable fair housing, civil rights, and nondiscrimination requirements, including but not limited to those requirements listed in 24 CFR 5.105(a).

- The PJ must comply with all applicable nondiscrimination and equal opportunity laws and requirements listed in 24 CFR 5.105(a) and any other applicable fair housing and civil rights laws and requirements when establishing preferences or methods of prioritization.

While PJs are not required to describe specific projects in its HOME-ARP allocation plan to which the preferences will apply, the PJ must describe the planned use of any preferences in its HOME-ARP allocation plan. This requirement also applies if the PJ intends to commit HOME-ARP funds to projects that will utilize preferences or limitations to comply with restrictive eligibility requirements of another project funding source. **If a PJ fails to describe preferences or limitations in its plan, it cannot commit HOME-ARP funds to a project that will implement a preference or limitation until the PJ amends its HOME-ARP allocation plan. For HOME-ARP rental housing projects, Section VI.B.20.a.iii of the HOME-ARP Notice (page 36) states that owners may only limit eligibility or give a preference to a particular qualifying population or segment of the qualifying population if the limitation or preference is described in the PJ's HOME-ARP allocation plan.** Adding a preference or limitation not previously described in the plan requires a substantial amendment and a public comment period in accordance with Section V.C.6 of the Notice (page 16).

**Template:**

*Identify whether the PJ intends to give preference to one or more qualifying populations or a subpopulation within one or more qualifying populations for any eligible activity or project:*

N.A.

*If a preference was identified, explain how the use of a preference or method of prioritization will address the unmet need or gap in benefits and services received by individuals and families in the qualifying population or subpopulation of qualifying population, consistent with the PJ's needs assessment and gap analysis:*

N.A.

**Referral Methods**

PJs are not required to describe referral methods in the plan. However, if a PJ intends to use a coordinated entry (CE) process for referrals to a HOME-ARP project or activity, the PJ must ensure compliance with Section IV.C.2 of the Notice (page10).

A PJ may use only the CE for direct referrals to HOME-ARP projects and activities (as opposed to CE and other referral agencies or a waitlist) if the CE expands to accept all HOME-ARP qualifying populations and implements the preferences and prioritization established by the PJ in its HOME-ARP allocation plan. A direct referral is where the CE provides the eligible applicant directly to the PJ, subrecipient, or owner to receive HOME-ARP TBRA, supportive services, admittance to a HOME-ARP rental unit, or occupancy of a NCS unit. In comparison, an indirect

referral is where a CE (or other referral source) refers an eligible applicant for placement to a project or activity waitlist. Eligible applicants are then selected for a HOME-ARP project or activity from the waitlist.

The PJ must require a project or activity to use CE along with other referral methods (as provided in Section IV.C.2.ii) or to use only a project/activity waiting list (as provided in Section IV.C.2.iii) if:

1. the CE does not have a sufficient number of qualifying individuals and families to refer to the PJ for the project or activity;
2. the CE does not include all HOME-ARP qualifying populations; or,
3. the CE fails to provide access and implement uniform referral processes in situations where a project's geographic area(s) is broader than the geographic area(s) covered by the CE

If a PJ uses a CE that prioritizes one or more qualifying populations or segments of qualifying populations (e.g., prioritizing assistance or units for chronically homeless individuals first, then prioritizing homeless youth second, followed by any other individuals qualifying as homeless, etc.) then this constitutes the use of preferences and a method of prioritization. To implement a CE with these preferences and priorities, the PJ **must** include the preferences and method of prioritization that the CE will use in the preferences section of their HOME-ARP allocation plan. Use of a CE with embedded preferences or methods of prioritization that are not contained in the PJ's HOME-ARP allocation does not comply with Section IV.C.2 of the Notice (page10).

### **Template: Focus on our Referral Methods**

***Identify the referral methods that the PJ intends to use for its HOME-ARP projects and activities. PJ's may use multiple referral methods in its HOME-ARP program. (Optional):***

Site based advertisement, application and establishment of site base waiting lists will comprise the opportunity to gain access.

Advertisement and marketing will be required to target the least likely to apply inclusive of race, and economic condition, acceptable to and monitored by Cook County. Borad-based appeal will be generated by initially making opportunities known through the established Community Partners with DPD and direct marketing, as developed and demonstrated through the Emergency Rental Assistance platforms.

There will be no exclusion of any qualified populations.

***If the PJ intends to use the coordinated entry (CE) process established by the CoC, describe whether all qualifying populations eligible for a project or activity will be included in the CE process, or the method by which all qualifying populations eligible for the project or activity will be covered. (Optional):***

- Not Applicable as the CE process will not be undertaken.

***If the PJ intends to use the CE process established by the CoC, describe the method of prioritization to be used by the CE. (Optional):***

- Not Applicable as the CE process will not be undertaken.

***If the PJ intends to use both a CE process established by the CoC and another referral method for a project or activity, describe any method of prioritization between the two referral methods, if any. (Optional):***

- Not Applicable as the CE process will not be undertaken.

### **Limitations in a HOME-ARP rental housing or NCS project**

- No limitations will be undertaken with HOME-ARP for Cook County.

Limiting eligibility for a HOME-ARP rental housing or NCS project is only permitted under certain circumstances.

- PJs must follow all applicable fair housing, civil rights, and nondiscrimination requirements, including but not limited to those requirements listed in 24 CFR 5.105(a). This includes, but is not limited to, the Fair Housing Act, Title VI of the Civil Rights Act, section 504 of Rehabilitation Act, HUD's Equal Access Rule, and the Americans with Disabilities Act, as applicable.
- A PJ may not exclude otherwise eligible qualifying populations from its overall HOME-ARP program.
- Within the qualifying populations, participation in a project or activity may be limited to persons with a specific disability only, if necessary, to provide effective housing, aid, benefit, or services that would be as effective as those provided to others in accordance with 24 CFR 8.4(b)(1)(iv). A PJ must describe why such a limitation for a project or activity is necessary in its HOME-ARP allocation plan (based on the needs and gap identified by the PJ in its plan) to meet some greater need and to provide a specific benefit that cannot be provided through the provision of a preference.
- For HOME-ARP rental housing, section VI.B.20.a.iii of the Notice (page 36) states that owners may only limit eligibility to a particular qualifying population or segment of the

qualifying population if the limitation is described in the PJ's HOME-ARP allocation plan.

- PJs may limit admission to HOME-ARP rental housing or NCS to households who need the specialized supportive services that are provided in such housing or NCS. However, no otherwise eligible individuals with disabilities or families including an individual with a disability who may benefit from the services provided may be excluded on the grounds that they do not have a particular disability.

### **Template**

***Describe whether the PJ intends to limit eligibility for a HOME-ARP rental housing or NCS project to a particular qualifying population or specific subpopulation of a qualifying population identified in section IV.A of the Notice:***

Cook County does not intend to limit eligibility. Any or all qualifying populations of homeless people (individuals and families who meet the criteria for the qualifying population of Notice CPD-21-10 , Section IV will be eligible for housing and/or services funded with HOME-ARP resources.

***If a PJ intends to implement a limitation, explain why the use of a limitation is necessary to address the unmet need or gap in benefits and services received by individuals and families in the qualifying population or subpopulation of qualifying population, consistent with the PJ's needs assessment and gap analysis:***

Cook County does not intend to limit eligibility – N.A.

***If a limitation was identified, describe how the PJ will address the unmet needs or gaps in benefits and services of the other qualifying populations that are not included in the limitation through the use of HOME-ARP funds (i.e., through another of the PJ's HOME-ARP projects or activities):***

N.A.

## HOME-ARP Refinancing Guidelines –

Cook County does not intend to use HOME-ARP funds to refinance existing affordable housing.

If the PJ intends to use HOME-ARP funds to refinance existing debt secured by multifamily rental housing that is being rehabilitated with HOME-ARP funds, the PJ must state its HOME-ARP refinancing guidelines in accordance with 24 CFR 92.206(b). The guidelines must describe the conditions under which the PJ will refinance existing debt for a HOME-ARP rental project, including:

- ***Establish a minimum level of rehabilitation per unit or a required ratio between rehabilitation and refinancing to demonstrate that rehabilitation of HOME-ARP rental housing is the primary eligible activity.***

N.A.

- ***Require a review of management practices to demonstrate that disinvestment in the property has not occurred; that the long-term needs of the project can be met; and that the feasibility of serving qualified populations for the minimum compliance period can be demonstrated.***

N.A.

- ***State whether the new investment is being made to maintain current affordable units, create additional affordable units, or both.***

N.A.

- ***Specify the required compliance period, whether it is the minimum 15 years or longer.***

N.A.

- ***State that HOME-ARP funds cannot be used to refinance multifamily loans made or insured by any federal program, including CDBG.***

N.A.

- ***Other requirements in the PJ's guidelines, if applicable:***

N.A.