

Cook County Bureau of Economic Development, Department of Planning and Development

Consolidated Plan

2025-2029



COOK COUNTY
BUREAU OF
ECONOMIC
DEVELOPMENT

Executive Summary (ES)

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

1. Introduction

This draft 2025-2029 Consolidated Plan (Con Plan) for Cook County, part of the Uplift Cook planning initiative, outlines a five-year strategic action plan to advance housing, economic and workforce development, infrastructure, and community development initiatives across the county. It is informed by current planning initiatives, robust stakeholder engagement, and a detailed analysis of current trends. Since the County's 2020-2024 Consolidated Plan — *Moving to Implementation* — major events such as the COVID-19 pandemic have driven significant changes to the region's economic landscape. Diminishing housing affordability, global supply chain challenges, workforce automation, and an increasing cost of living are placing increased pressures on residents, communities, and businesses. The draft Con Plan presents a strategic pathway forward, informed by past successes, current challenges, and priority opportunities to expand access to housing and economic opportunity for all.

2. Summary of the objectives and outcomes identified in the Plan Needs Assessment

Overview

1. Housing and Homelessness

Goal: Provide a continuum of quality, affordable housing for all.

Access to stable, safe affordable housing is a core tenet of economic and community stability. Housing provides necessary shelter while also creating opportunities to build wealth, foster social connections, and promote positive health and educational outcomes. Providing a continuum of quality, affordable housing creates economic and community benefits that transcend the housing units themselves. A robust housing ecosystem in Cook County includes everything from shelter programs that provide stability for unhoused residents to attainable homeownership units that offer wealth building opportunities for residents at all incomes.

2. Economic Development

Goal: Foster inclusive, resilient economic growth that creates opportunities for all residents and businesses to thrive.

Successful economic development is driven by targeted, fair investments in businesses and residents, as well as regional collaboration to strengthen key industries and sectors. The County's economic development strategy leverages key regional assets including an extensive transportation network, access to domestic supply chains, broad ecosystem of educational institutions, and strong regional partnerships to strengthen and reactivate markets. Overall, the County seeks to foster inclusive, resilient economic growth that lifts up small businesses, promotes innovation and entrepreneurship, and grows industries with jobs that lead to upward mobility.

3. Workforce Development

Goal: Promote pathways to good jobs that support economic mobility for residents and meet the needs of employers.

Workforce development is integral to advancing countywide economic development initiatives and increasing residents' economic mobility. As the economy evolves, the workforce must be prepared to meet the needs of modern industries. Workforce development efforts aim to provide pathways to good jobs with living wages and opportunities for career advancement by reducing barriers to job access and fostering connections between employers, job seekers, and workforce service providers. These initiatives are targeted toward emerging and growing industries as well as the long-standing priority industries that are integral to the county economy.

4. Infrastructure

Goal: Leverage infrastructure investments to promote resiliency, accessibility, and equitable economic growth.

Strong infrastructure networks support job access, business development, improved safety, climate resilience, and accessibility, among other priorities. Cook County seeks to intentionally leverage infrastructure investments to meet current and future community needs.

5. Community Development

Goal: Build healthy, connected, and sustainable communities where residents have equitable access to services and amenities.

Community development includes ensuring access to healthcare, food, childcare, and other fundamental needs that impact the health, safety, and economic opportunity of residents. Building healthy, connected, and sustainable communities where residents have access to services and amenities requires intentional investment. Cook County seeks to prioritize investments in areas with the greatest need, especially geographic areas with high concentrations of low-income residents or otherwise vulnerable communities.

3. Evaluation of past performance

Cook County Department of Planning and Development (DPD) has effectively administered federal funds in a timely, compliant, and effective manner, as indicated by its continual success at achieving intended outcomes. DPD has become a model grantee in the region as it relates to timely commitment, expenditure, and effective deployment of federal funds. Over the last five years, DPD has successfully managed approximately \$172 million in federal funding from the U.S. Department of Housing and Urban Development (HUD), including annual Community Development Block Grant (CDBG), HOME Investment Partnerships Program (HOME), and Emergency Solutions Grants Program (ESG) allocations, as well as singular resources such as Homelessness Prevention and Rapid Re-Housing Program (HPRP), CDBG-Disaster Recovery (DR), CDBG-CARES Act (CV) and ESG-CV.

Moving to Implementation successfully advanced internal coordination across departments; external coordination among local governments, service providers and residents; and affordable housing development in opportunity areas. In 2023 alone, over 12,300 residents were provided with social and housing services, and funding was approved to support development of 530 new housing units across 11 projects (Bureau of Economic Development Impact Report 2023). Stakeholders engaged through the

steering committee and focus groups indicated that improved regional collaboration and partnerships has been a key area of success in advancing economic development and housing goals in recent years.

4. Summary of citizen participation process and consultation process

To effectively engage a diverse range of stakeholders, the Uplift Cook Project Team (consisting of staff from Cook County DPD, the South Suburban Mayors and Managers Association (SSMMA), and consultants SB Friedman Development Advisors, LLC and All Together Studio) developed an engagement and communications strategy that leveraged a mix of in-person and digital methods across several participation formats. A steering committee composed of representatives from regional planning bodies, community organizations and nonprofits, business leaders, practitioners, and advocacy groups served as the primary advisory body during the plan’s development. Steering committee member organizations were selected to ensure representation across the county’s diverse geographies, residents, and communities. Uplift Cook’s steering committee met four times during the process, including three in-person, interactive workshops and one virtual meeting with breakout group discussions.

In addition to the steering committee, the Project Team facilitated ten focus groups aligning with the plan’s five topic areas of housing and homelessness, community development, economic development, workforce development, and infrastructure. As with the steering committee, focus group participants encompassed stakeholders representing the county’s diverse communities and residents. Over 250 individuals attended across the ten focus groups, with 165 attendees representing organizations or institutions outside of Cook County government. The Project Team also conducted 20 interviews with members of Suburban Cook County’s Continuum of Care, public housing authorities, publicly funded institutions and systems of care that may discharge persons into homelessness, business and civic leaders, local health and welfare agencies, broadband internet service providers, adjacent units of local government, and individual steering committee members.

The draft Con Plan will be shared for feedback during a 30-day public comment period with members of the public, steering committee members, Cook County’s four Councils of Government, Cook County HOME Consortium, Suburban Cook County’s Continuum of Care, and other stakeholders. Finally, the plan leverages the considerable public participation efforts undertaken to develop the Cook County 2024-2027 Policy Roadmap for the Offices Under the President (OUP) and the Cook County Bureau of Economic Development (BED) 2024-2027 Strategic Plan. Throughout the planning process, these stakeholders provided critical input regarding prospective goals, priorities, and strategies, which informed the plan that was ultimately developed.

5. Summary of public comments

[pending public comment period]

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

[pending public comment period]

7. Summary

The Con Plan has been prepared as one component of a larger Cook County planning initiative — Uplift Cook. Uplift Cook encompasses the Con Plan as well as the County’s Comprehensive Economic Development Strategy (CEDS) for the U.S. Economic Development Administration (EDA).

The County launched Uplift Cook to proactively plan for economic development, workforce development, housing and homelessness, infrastructure, and community development throughout the county. The plan is organized by goals centered around each of these five topic areas. As DPD is housed within BED, the plan’s strategies align with the four pillars of the BED 2024-2027 Strategic Plan: residents, communities, businesses, and systems.

Other recent County and regional planning initiatives leveraged in the development of Uplift Cook include the Cook County 2024-2027 Policy Roadmap, Cook County Housing Policy Brief (2024), Cook County Transit Plan (2023), Cook County Digital Equity Plan (2023), Workforce Innovation and Opportunity Act Local Workforce Innovation Area (LWIA) 7 Local Plan (2024-2028), Report on Childcare in Cook County (2023), ON TO 2050 (the regional comprehensive plan and long range regional transportation plan), and the Alliance to End Homelessness in Suburban Cook County 2019-2022 Strategic Plan.

The Process (PR)

PR-05 Lead & Responsible Agencies 24 CFR 91.200(b)

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

The following agencies/entities are responsible for preparing the draft 2025-2029 Consolidated Plan (Con Plan) and responsible for administration of each grant program and funding source.

Agency Role	Name	Department/Agency
Lead Agency	Cook County	
CDBG Administrator	Cook County	Department of Planning and Development
HOME Administrator	Cook County	Department of Planning and Development
ESG Administrator	Cook County	Department of Planning and Development

Table 1 – Responsible Agencies

Narrative

DPD administers resources provided by HUD, including annual entitlement funds from the Community Development Block Grant (CDBG), Emergency Solutions Grant (ESG), and HOME Investment Partnerships (HOME) programs. DPD also administers special allocations of formula-based and competitive HUD funding. In recent years, these special allocations have included CDBG-Disaster Recovery (DR) and CDBG-CARES Act (CV) funding.

DPD is principally charged with planning for, developing, and administering programming and projects related to community development, affordable housing, and economic development. DPD is committed to cultivating vital communities by fostering economic opportunities and business development; preserving and expanding the supply of safe, decent, and affordable housing; facilitating infrastructure improvements; promoting fair housing; and supporting social services and programs that address the needs of the County's most vulnerable residents. The Cook County Economic Development Advisory Committee (EDAC), Council of Economic Advisors (CEA), and Board of Commissioners provide additional advice and oversight for related programs and special initiatives.

Cook County serves as the lead entity for the Cook County Urban County, which includes unincorporated Cook County and all municipalities in Cook County except: Arlington Heights, Berwyn, Chicago, Cicero, Des Plaines, Evanston, Hoffman Estates, Mount Prospect, Oak Park, Palatine, Schaumburg, and Skokie. Cook County also serves as the lead entity for the Cook County HOME Consortium, which includes all municipalities in Cook County except Chicago and Evanston. This draft 2025-2029 Con Plan and the draft 2025 Annual Action Plan are applicable to the current jurisdictional boundaries of the Cook County Urban County and HOME Consortium.

Con Plan Public Contact Information

The primary point of contact for inquiries related to the Con Plan and Uplift Cook, as well as requests for Certification of Consistency with the Con Plan, is Susan Campbell, Director, Cook County Department of Planning and Development, 69 West Washington St., Suite 2900, Chicago, Illinois, 60602, 312-603-1033, susan.campbell@cookcountyil.gov.

The primary point of contact for inquiries related to DPD operations is Susan Campbell, Director, Cook County Department of Planning and Development, 69 West Washington St., Suite 2900, Chicago, Illinois, 60602, 312-603-1033, susan.campbell@cookcountyil.gov.

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

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

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

PR-10 Consultation – 91.100, 91.110, 91.200(b), 91.300(b), 91.215(I) and 91.315(I)

1. Introduction

The Project Team received guidance and feedback throughout the planning process via four steering committee meetings, 10 focus groups, 20 stakeholder interviews, numerous surveys, email correspondence, and two public hearings. Input was solicited from critical local, regional, state, and federal stakeholders representing the public, private, and nonprofit sectors. Stakeholders consulted include, among others: county and municipal governments, public housing authorities, EDAC, South Suburban Mayors and Managers Association (SSMMA), Chicago Metropolitan Agency for Planning, Housing Action Illinois, the Alliance to End Homelessness in Suburban Cook County (the “Alliance”), AIDS Foundation Chicago, Cook County Health, and the Chicago Lighthouse. Numerous other stakeholders representing philanthropic and community-based organizations; educational and research institutions; residential and commercial developers; assisted housing providers; fair housing advocates; social service providers; private and governmental health, mental health, and service agencies; and entities focused on serving the homeless or other special needs populations also participated. DPD engaged in consultation and coordination with HOME Consortium member municipalities through focus groups.

Provide a concise summary of the jurisdiction’s activities to enhance coordination between public and assisted housing providers and private and governmental health, mental health and service agencies (91.215(l)).

The Project Team reached out by email to the public housing authorities serving Suburban Cook County for data and input on the Housing Market Analysis and Homeless Needs Assessment. These include the Housing Authority of Cook County (HACC), Oak Park Housing Authority (OPHA), Cicero Housing Authority (Cicero HA), and Housing Authority of Park Forest (HAPF). The Project Team conducted interviews with HACC and OPHA, but were unable to schedule conversations with the Cicero HA and HAPF despite multiple outreach attempts. Cicero HA provided written feedback via email, which informed the draft Con Plan.

The Project Team conducted interviews with organizations and entities providing supportive services, including Cook County Health, AIDS Foundation Chicago, and the Chicago Lighthouse, as well as organizations that provide or support mental and physical health services. Numerous nonprofits in the county provide a combination of housing and supportive services, particularly for residents with special needs (such as the elderly, people with disabilities, and those living with HIV/AIDS), substance abuse disorders, and mental illness. These stakeholders were engaged throughout the Con Plan process, providing feedback on how to best address gaps in the institutional delivery structure, improve access to services for residents, and coordinate among partners.

Describe coordination with the Continuum of Care and efforts to address the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans, and unaccompanied youth) and persons at risk of homelessness

The Alliance leads the Cook County Continuum of Care. As the lead agency, the Alliance coordinates homeless services across more than 40 agencies serving 30 suburban townships, 131 municipalities, 573 square miles, and 2.5 million residents. The Alliance also operates Coordinated Entry — a community-wide system to standardize and expedite how people connect to housing resources, provides training and technical assistance, and advocates for the needs of people experiencing homelessness.

DPD and the Alliance are strong partners and allies. The Executive Director of the Alliance and other staff members provided insight and feedback throughout the Con Plan development process, directly informing strategies and priority actions. Alliance representatives attended housing, community development, and economic development focus groups, provided key data on housing needs and program participation, and shared feedback on specific needs and priorities during stakeholder interviews with the Project Team. The strategies to address and prevent homelessness included in the Con Plan align with the Alliance’s 2019-2022 Strategic Plan (the most recent available), priorities identified in conversations with Alliance staff, and BED’s 2024-2027 Strategic Plan.

Describe consultation with the Continuum(s) of Care that serves the jurisdiction's area in determining how to allocate ESG funds, develop performance standards and evaluate outcomes, and develop funding, policies and procedures for the administration of HMIS

The Executive Director of the Alliance sits on the Planning and Development Subcommittee of EDAC and provided proactive input into the development of the draft Con Plan. In this role, the Alliance is also involved in consultation and decision-making around economic development, affordable housing, and community development in Suburban Cook County as supported by ESG funds. Specifically, this action-oriented subcommittee informs funding investments and partnerships for DPD programs, projects, and special initiatives. As such, the Alliance will play a critical role in determining how to allocate ESG funds and support HMIS in Suburban Cook County. The County consults with the Alliance each year on suggested allocations of ESG funding by component. Consultation is also important to coordinate County ESG investments with matching funds that serve Suburban Cook County.

2. Describe Agencies, groups, organizations and others who participated in the process and describe the jurisdictions consultations with housing, social service agencies and other entities

Agency/Group/Organization	Agency/Group/Organization Type	Section of the Plan	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation?
Metropolitan Water Reclamation District of Greater Chicago (MWRD)	Agency-Managing Flood Prone Areas, Agency-Management of Public Land or Water Resources, Housing	Non-Homeless Special Needs	The Project Team engaged the Metropolitan Water Reclamation District of Greater Chicago (MWRD) through focus group sessions and a stakeholder interview with three representatives. During the focus groups, the Project Team presented draft strategies, which MWRD helped refine and prioritize. In the stakeholder interview, MWRD shared input on public improvement needs, current and future initiatives, and stormwater management systems. Feedback was incorporated as appropriate. The anticipated outcomes of this consultation include stronger alignment between the Con Plan and MWRD priorities, enhanced coordination across initiatives, and increased effectiveness of implementation efforts.
Forest Preserve District of Cook County	Agency-Management of Public Land or Water Resources	Non-Homeless Special Needs	The Project Team engaged the Forest Preserve District of Cook County (FPDCC) through focus group sessions. FPDCC offered input on key strengths, weaknesses, opportunities, and threats. The Project Team also presented draft strategies, which FPDCC helped prioritize, refine, and enhance with additional feedback. Comments and insights were incorporated as appropriate. The anticipated outcomes of this consultation include stronger alignment between the Con Plan and FPDCC priorities, enhanced coordination across initiatives, and increased effectiveness of implementation efforts.

Agency/Group/ Organization	Agency/Group/ Organization Type	Section of the Plan	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation?
Cook County Health	Services-Health, Other government-County, Health Agency	Non-Homeless Special Needs, Housing Need Assessment, Homelessness Strategy, Anti-poverty Strategy, Homeless Needs - Chronically homeless, HOPWA Strategy	The Project Team engaged Cook County Health (CCH) through focus groups, a stakeholder interview with a representative, and the Con Plan’s steering committee. In the focus groups, the Project Team presented draft strategies, which CCH helped refine and prioritize. CCH provided input on housing and supportive service needs, relevant programs and system gaps. CCH contributed expertise during four key steering committee meetings, shaping the Con Plan’s strategic direction and recommendations. CCH also participated in a SWOT analysis, discussions, and prioritization exercises to refine strategies. Feedback was incorporated as appropriate. The anticipated outcomes of this consultation include stronger alignment between the Con Plan and CCH priorities, improved coordination across initiatives, and enhanced effectiveness of implementation efforts.
The Harbour	Services-Children, Services-homeless, Child Welfare Agency, Services-Victims	Homelessness Needs - Unaccompanied youth, Homeless Needs - Families with children, Housing Need Assessment	The Project Team engaged The Harbour through focus group sessions and a stakeholder interview with three representatives. During the focus groups, the Project Team presented draft strategies, which The Harbour helped refine and prioritize. In the stakeholder interview, The Harbour shared input on housing and supportive service needs of youth and young mothers experiencing homelessness. Feedback was incorporated as appropriate. The anticipated outcomes of this consultation include stronger alignment between the Con Plan and The Harbour’s priorities, enhanced coordination across initiatives, and increased effectiveness of implementation efforts.

Agency/Group/ Organization	Agency/Group/ Organization Type	Section of the Plan	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation?
Community and Economic Development Association of Cook County, Inc.	Services-Children, Services-Housing, Services-Health, Services-Education, Services-Employment	Non-Homeless Special Needs, Anti-poverty Strategy	The Project Team engaged the Community and Economic Development Association of Cook County, Inc. (CEDA) through focus group sessions. CEDA offered input on key strengths, weaknesses, opportunities, and threats. The Project Team also presented draft strategies, which CEDA helped prioritize, refine, and enhance with additional feedback. Comments and insights were incorporated as appropriate. The anticipated outcomes of this consultation include stronger alignment between the Con Plan and CEDA priorities, enhanced coordination across initiatives, and increased effectiveness of implementation efforts.
Family Promise Chicago North Shore	Services-Children, Services-Employment, Services-homeless	Housing Need Assessment, Homeless Needs - Families with children, Homelessness Strategy	The Project Team engaged Family Promise Chicago North Shore through focus group sessions. Family Promise offered input on key strengths, weaknesses, opportunities, and threats. The Project Team also presented draft strategies, which Family Promise helped prioritize, refine, and enhance with additional feedback. Comments and insights were incorporated as appropriate. The anticipated outcomes of this consultation include stronger alignment between the Con Plan and Family Promise's priorities, enhanced coordination across initiatives, and increased effectiveness of implementation efforts.
Kenneth Youth Center	Services-Children, Services-Elderly Persons, Services-Health	Housing Need Assessment, Non-Homeless Special Needs	The Project Team engaged the Kenneth Youth Center through focus group sessions. The Kenneth Youth Center offered input on key strengths, weaknesses, opportunities, and threats. The Project Team also presented draft strategies, which the Kenneth Youth Center helped prioritize, refine, and enhance with additional feedback. Comments and insights were incorporated as appropriate. The anticipated outcomes of this consultation include stronger alignment between the Con Plan and the Center's priorities, enhanced coordination across initiatives, and increased effectiveness of implementation efforts.

Agency/Group/ Organization	Agency/Group/ Organization Type	Section of the Plan	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation?
Connections for the Homeless	Services-homeless, Housing, Services-Housing	Housing Need Assessment, Homelessness Strategy, Homeless Needs - Families with children, Homeless Needs - Chronically homeless	The Project Team engaged Connections for the Homeless (Connections) through focus group sessions and a stakeholder interview with five representatives. During the focus groups, the Project Team presented draft strategies, which Connections helped refine and prioritize. In the stakeholder interview, Connections shared input on housing and supportive service needs, as well as data on relevant programs. Feedback was incorporated as appropriate. The anticipated outcomes of this consultation include stronger alignment between the Con Plan and Connections priorities, enhanced coordination across initiatives, and increased effectiveness of implementation efforts.
Alliance to End Homelessness	Services-homeless, Public Funded Institution/System of Care, Services-Housing, Services-Persons with HIV/AIDS	Homelessness Strategy, Housing Need Assessment, Homeless Needs - Families with children, Homeless Needs - Chronically homeless, Homelessness Needs - Veterans, Public Housing Needs, Homelessness Needs - Unaccompanied youth, Non-Homeless Special Needs, Market Analysis, Economic Development, Anti-poverty Strategy	The Project Team engaged the Alliance to End Homelessness through focus group sessions and a stakeholder interview with three representatives. During the focus groups, the Project Team presented draft strategies, which the Alliance helped refine and prioritize. In the stakeholder interview, the Alliance shared input on the needs of families and individuals experiencing or at-risk of homelessness, as well as relevant supportive services and the Alliance's role as the Continuum of Care. Feedback was incorporated as appropriate. The anticipated outcomes of this consultation include stronger alignment between the Con Plan and the Alliance's priorities, enhanced coordination across initiatives, and increased effectiveness of implementation efforts.

Agency/Group/ Organization	Agency/Group/ Organization Type	Section of the Plan	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation?
South Suburban PADS	Services-homeless, Services-Housing, Housing, Services-Health, Services-Employment	Housing Need Assessment, Homeless Needs - Chronically homeless, Homeless Needs - Families with children	The Project Team engaged South Suburban PADS through focus group sessions. South Suburban PADS offered input on key strengths, weaknesses, opportunities, and threats. The Project Team also presented draft strategies, which South Suburban PADS helped prioritize, refine, and enhance with additional feedback. Comments and insights were incorporated as appropriate. The anticipated outcomes of this consultation include stronger alignment between the Con Plan and South Suburban PADS priorities, enhanced coordination across initiatives, and increased effectiveness of implementation efforts.
BEDS Plus Care	Services-homeless, Services-Victims of Domestic Violence, Services-Housing	Homeless Needs - Chronically homeless, Housing Need Assessment, Homeless Needs - Families with children	The Project Team engaged BEDS Plus Care through focus group sessions. BEDS Plus Care offered input on key strengths, weaknesses, opportunities, and threats. The Project Team also presented draft strategies, which BEDS Plus Care helped prioritize, refine, and enhance with additional feedback. Comments and insights were incorporated into the Con Plan as appropriate. The anticipated outcomes of this consultation include stronger alignment between the Con Plan and the BEDS Plus Care's priorities, enhanced coordination across initiatives, and increased effectiveness of implementation efforts.
Respond Now	Services-homeless, Services-Health, Services-Persons with HIV/AIDS, Services-Housing	Homeless Needs - Families with children, Homelessness Strategy	The Project Team engaged Respond Now through focus group sessions. Respond Now offered input on key strengths, weaknesses, opportunities, and threats. The Project Team also presented draft strategies, which Respond Now helped prioritize, refine, and enhance with additional feedback. Comments and insights were incorporated as appropriate. The anticipated outcomes of this consultation include stronger alignment between the Con Plan and Respond Now's priorities, enhanced coordination across initiatives, and increased effectiveness of implementation efforts.

Agency/Group/ Organization	Agency/Group/ Organization Type	Section of the Plan	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation?
Chicago Area Fair Housing Alliance	Services-homeless, Service-Fair Housing	Housing Need Assessment, Non-Homeless Special Needs	The Project Team engaged the Chicago Area Fair Housing Alliance (CAFHA) through focus group sessions. CAFHA offered input on key strengths, weaknesses, opportunities, and threats. The Project Team also presented draft strategies, which CAFHA helped prioritize, refine, and enhance with additional feedback. Comments and insights were incorporated into the Con Plan. The anticipated outcomes of this consultation include stronger alignment between the Con Plan and CAFHA priorities, enhanced coordination across initiatives, and increased effectiveness of implementation efforts.
South Suburban Housing Center	Services-homeless, Service-Fair Housing, Services-Education	Housing Need Assessment, Non-Homeless Special Needs	The Project Team engaged the South Suburban Housing Center through focus group sessions. South Suburban Housing Center offered input on key strengths, weaknesses, opportunities, and threats. The Project Team also presented draft strategies, which the South Suburban Housing Center helped prioritize, refine, and enhance with additional feedback. Comments and insights were incorporated as appropriate. The anticipated outcomes of this consultation include stronger alignment between the Con Plan and the Center's priorities, enhanced coordination across initiatives, and increased effectiveness of implementation efforts.
Housing Action Illinois	Services-homeless	Homelessness Strategy, Housing Need Assessment	The Project Team engaged Housing Action Illinois (HAI) through focus group sessions and a stakeholder interview with the executive director. During the focus groups, the Project Team presented draft strategies, which HAI helped refine and prioritize. In the stakeholder interview, HAI shared input on relevant strategies, aligned current projects, future initiatives, needed County support, and gaps in the Con Plan. Feedback was incorporated into the Con Plan. The anticipated outcomes of this consultation include stronger alignment between the Con Plan and HAI priorities, enhanced coordination across initiatives, and increased effectiveness of implementation efforts.

Agency/Group/ Organization	Agency/Group/ Organization Type	Section of the Plan	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation?
Housing Forward	Services-homeless, Services-Victims of Domestic Violence, Services-Housing, Services-Children	Homeless Needs - Families with children, Homeless Needs - Chronically homeless, Housing Need Assessment, Homelessness Needs - Veterans, Homelessness Needs - Unaccompanied youth, Homelessness Strategy	The Project Team engaged Housing Forward through focus group sessions and a stakeholder interview with two representatives. During the focus groups, the Project Team presented draft strategies, which Housing Forward helped refine and prioritize. In the stakeholder interview, Housing Forward shared input on housing and supportive service needs, especially for veterans, unaccompanied youth, and domestic violence victims. Feedback was incorporated as appropriate. The anticipated outcomes of this consultation include stronger alignment between the Con Plan and Housing Forward's priorities, enhanced coordination across initiatives, and increased effectiveness of implementation efforts.
Northwest Compass	Services-homeless, Services-Children	Non-Homeless Special Needs, Homeless Needs - Families with children, Anti-poverty Strategy, Housing Need Assessment	The Project Team engaged Northwest Compass through focus group sessions. Northwest Compass offered input on key strengths, weaknesses, opportunities, and threats. The Project Team also presented draft strategies, which Northwest Compass helped prioritize, refine, and enhance with additional feedback. Comments and insights were incorporated as appropriate. The anticipated outcomes of this consultation include stronger alignment between the Con Plan and Northwest Compass' priorities, enhanced coordination across initiatives, and increased effectiveness of implementation efforts.
Together We Cope	Services-homeless, Services-Children, Services-Victims of Domestic Violence, Services-Persons with Disabilities , Planning organization	Homeless Needs - Families with children, Non-Homeless Special Needs, Homeless Needs - Chronically homeless, Anti-poverty Strategy	The Project Team engaged Together We Cope through focus group sessions. Together We Cope offered input on key strengths, weaknesses, opportunities, and threats. The Project Team also presented draft strategies, which Together We Cope helped prioritize, refine, and enhance with additional feedback. Comments and insights were incorporated as appropriate. The anticipated outcomes of this consultation include stronger alignment between the Con Plan and the Together We Cope's priorities, enhanced coordination across initiatives, and increased effectiveness of implementation efforts.

Agency/Group/ Organization	Agency/Group/ Organization Type	Section of the Plan	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation?
Village of Park Forest	Other government-Local	Economic Development, Market Analysis, Housing Need Assessment	The Project Team engaged the Village of Park Forest through focus group sessions. The Village offered input on key strengths, weaknesses, opportunities, and threats. The Project Team also presented draft strategies, which the Village helped prioritize, refine, and enhance with additional feedback. Comments and insights were incorporated as appropriate. The anticipated outcomes of this consultation include stronger alignment between the Con Plan and the Village's priorities, enhanced coordination across initiatives, and increased effectiveness of implementation efforts.
Village of Mount Prospect	Other government-Local	Economic Development, Market Analysis, Housing Need Assessment	The Project Team engaged the Village of Mount Prospect through focus group sessions. The Village offered input on key strengths, weaknesses, opportunities, and threats. The Project Team also presented draft strategies, which the Village helped prioritize, refine, and enhance with additional feedback. Comments and insights were incorporated as appropriate. The anticipated outcomes of this consultation include stronger alignment between the Con Plan and the Village's priorities, enhanced coordination across initiatives, and increased effectiveness of implementation efforts.
Village of Arlington Heights	Other government-Local	Economic Development, Market Analysis, Housing Need Assessment	The Project Team engaged the Village of Arlington Heights through focus group sessions. The Village offered input on key strengths, weaknesses, opportunities, and threats. The Project Team also presented draft strategies, which the Village helped prioritize, refine, and enhance with additional feedback. Comments and insights were incorporated as appropriate. The anticipated outcomes of this consultation include stronger alignment between the Con Plan and the Village's priorities, enhanced coordination across initiatives, and increased effectiveness of implementation efforts.

Agency/Group/ Organization	Agency/Group/ Organization Type	Section of the Plan	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation?
Chicago Metropolitan Agency for Planning	Regional organization, Planning organization	Housing Need Assessment, Economic Development, Market Analysis	The Project Team engaged the Chicago Metropolitan Agency for Planning (CMAP) through focus groups and the Con Plan’s steering committee. In the focus groups, the Project Team provided draft strategies, which CMAP helped refine and prioritize. As a steering committee member, CMAP offered expertise during four key meetings, shaping the Con Plan’s strategic direction and recommendations. CMAP also participated in a SWOT analysis, collaborative discussions, and prioritization exercises to further refine strategies. Feedback was incorporated as appropriate. The anticipated outcomes of this consultation include stronger alignment between the Con Plan and CMAP priorities, improved coordination across initiatives, and enhanced effectiveness of implementation efforts.
Metropolitan Planning Council (MPC)	Planning organization, Regional organization	Housing Need Assessment, Economic Development	The Project Team engaged the Metropolitan Planning Council (MPC) through focus groups and the Con Plan’s steering committee. In the focus groups, the Project Team provided draft strategies, which MPC helped refine and prioritize. As a steering committee member, MPC offered expertise during four key meetings, shaping the Con Plan’s strategic direction and recommendations. MPC also participated in a SWOT analysis, collaborative discussions, and prioritization exercises to further refine strategies. Feedback was incorporated as appropriate. The anticipated outcomes of this consultation include stronger alignment between the Con Plan and MPC priorities, improved coordination across initiatives, and enhanced effectiveness of implementation efforts.

Agency/Group/ Organization	Agency/Group/ Organization Type	Section of the Plan	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation?
South Suburban Mayors and Managers Association (SSMMA)	Civic Leaders, Regional organization, Planning organization	Housing Need Assessment, Economic Development	The Project Team engaged the South Suburban Mayors and Managers Association (SSMMA) through focus groups, the Con Plan’s steering committee, and as a member of the Project Team. In the focus groups, the Project Team provided draft strategies, which SSMMA helped refine and prioritize. As a steering committee member, SSMMA offered expertise during four key meetings, shaping the Con Plan’s strategic direction and recommendations. SSMMA also participated in a SWOT analysis, collaborative discussions, and prioritization exercises to further refine strategies. SSMMA provided feedback throughout the process as a member of the Project Team. Feedback was incorporated as appropriate. The anticipated outcomes of this consultation include stronger alignment between the Con Plan and SSMMA priorities, improved coordination across initiatives, and enhanced effectiveness of implementation efforts.
City of Chicago Planning and Development (DPD)	Other government-Local	Housing Need Assessment, Market Analysis, Economic Development	The Project Team engaged the City of Chicago Planning and Development (DPD) through the Con Plan’s steering committee, providing regular progress updates. As a committee member, DPD contributed expertise across four key meetings, helping guide the Con Plan’s strategic direction and recommendations. DPD participated in a SWOT analysis, collaborative discussions, and prioritization exercises to refine strategies. Comments and insights were incorporated as appropriate. The anticipated outcomes of this consultation include stronger alignment between the Con Plan and DPD priorities, enhanced coordination across initiatives, and increased effectiveness of implementation efforts.
Oak Park Housing Authority	Housing, Other government-Local, PHA, Services-Elderly Persons, Services-Persons with Disabilities	Public Housing Needs, Housing Need Assessment, Market Analysis	The Project Team engaged the Oak Park Housing Authority (OPHA) through focus group sessions and a stakeholder interview with the executive director. During the focus groups, the Project Team presented draft strategies, which OPHA helped refine and prioritize. OPHA shared data and input on public housing conditions, needs of residents on waiting list, and relevant initiatives. Feedback was incorporated as appropriate. The anticipated outcomes of this consultation include stronger alignment between the Con Plan and OPHA’s priorities, enhanced coordination across initiatives, and increased effectiveness of implementation efforts.

Agency/Group/ Organization	Agency/Group/ Organization Type	Section of the Plan	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation?
Illinois Housing Development Authority	Other government-State, Housing, PHA, Services-Elderly Persons, Services-Persons with Disabilities	Public Housing Needs, Housing Need Assessment, Market Analysis	The Project Team engaged the Illinois Housing Development Authority (IHDA) through focus group sessions. IHDA offered input on key strengths, weaknesses, opportunities, and threats. The Project Team also presented draft strategies, which IHDA helped prioritize, refine, and enhance with additional feedback. Comments and insights were incorporated as appropriate. The anticipated outcomes of this consultation include stronger alignment between the Con Plan and the IHDA's priorities, enhanced coordination across initiatives, and increased effectiveness of implementation efforts.
Housing Authority of Cook County	PHA, Other government-County, Housing, Services-Persons with Disabilities, Services-Elderly Persons	Public Housing Needs, Homelessness Needs - Veterans, Homeless Needs - Families with children, Anti-poverty Strategy, Homelessness Strategy, Homeless Needs - Chronically homeless, Market Analysis	The Project Team engaged the Housing Authority of Cook County (HACC) through focus group sessions and a stakeholder interview with the executive director. During the focus groups, the Project Team presented draft strategies, which HACC helped refine and prioritize. In the stakeholder interview, HACC shared data for the Con Plan and input on public housing conditions, needs of residents on waiting list, and relevant initiatives. Feedback was incorporated as appropriate. The anticipated outcomes of this consultation include stronger alignment between the Con Plan and HACC's priorities, enhanced coordination across initiatives, and increased effectiveness of implementation efforts.
100 Black Men of Chicago	Services-Education, Services-Employment, Services-Health	Non-Homeless Special Needs	The Project Team engaged 100 Black Men of Chicago through focus group sessions. 100 Black Men offered input on key strengths, weaknesses, opportunities, and threats. The Project Team also presented draft strategies, which 100 Black Men helped prioritize, refine, and enhance with additional feedback. Comments and insights were incorporated as appropriate. The anticipated outcomes of this consultation include stronger alignment between the Con Plan and 100 Black Men's priorities, enhanced coordination across initiatives, and increased effectiveness of implementation efforts.
OAI, Inc	Services-Employment, Services-Education	Non-Homeless Special Needs	The Project Team engaged OAI, Inc through focus group sessions. OAI offered input on key strengths, weaknesses, opportunities, and threats. The Project Team also presented draft strategies, which OAI helped prioritize, refine, and enhance with additional feedback. Comments and insights were incorporated as appropriate. The anticipated outcomes of this consultation include stronger alignment between the Con Plan and OAI's priorities, enhanced coordination across initiatives, and increased effectiveness of implementation efforts.

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Oakton Community College	Services-Education	Non-Homeless Special Needs, Economic Development	The Project Team engaged Oakton Community College (OCC) through focus group sessions. OCC offered input on key strengths, weaknesses, opportunities, and threats. The Project Team also presented draft strategies, which OCC helped prioritize, refine, and enhance with additional feedback. Comments and insights were incorporated as appropriate. The anticipated outcomes of this consultation include stronger alignment between the Con Plan and OCC's priorities, enhanced coordination across initiatives, and increased effectiveness of implementation efforts.
City Colleges of Chicago	Services-Education	Non-Homeless Special Needs, Economic Development	The Project Team engaged City Colleges of Chicago through focus group sessions. CCC offered input on key strengths, weaknesses, opportunities, and threats. The Project Team also presented draft strategies, which CCC helped prioritize, refine, and enhance with additional feedback. Comments and insights were incorporated as appropriate. The anticipated outcomes of this consultation include stronger alignment between the Con Plan and CCCs priorities, enhanced coordination across initiatives, and increased effectiveness of implementation efforts.
Prairie State College	Services-Education	Non-Homeless Special Needs, Economic Development	The Project Team engaged Prairie State College (PSC) through focus group sessions. PSC offered input on key strengths, weaknesses, opportunities, and threats. The Project Team also presented draft strategies, which PSC helped prioritize, refine, and enhance with additional feedback. Comments and insights were incorporated as appropriate. The anticipated outcomes of this consultation include stronger alignment between the Con Plan and PSC's priorities, enhanced coordination across initiatives, and increased effectiveness of implementation efforts.
Village of Lemont	Other government-Local	Non-Homeless Special Needs, Economic Development	The Project Team engaged the Village of Lemont through focus group sessions. The Village offered input on key strengths, weaknesses, opportunities, and threats. The Project Team also presented draft strategies, which the Village helped prioritize, refine, and enhance with additional feedback. Comments and insights were incorporated as appropriate. The anticipated outcomes of this consultation include stronger alignment between the Con Plan and the Village's priorities, enhanced coordination across initiatives, and increased effectiveness of implementation efforts.

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Rainbow PUSH Coalition	Services-Education, Business and Civic Leaders	Non-Homeless Special Needs, Anti-poverty Strategy	The Project Team engaged Rainbow PUSH Coalition through focus group sessions. Rainbow PUSH Coalition offered input on key strengths, weaknesses, opportunities, and threats. The Project Team also presented draft strategies, which Rainbow PUSH Coalition helped prioritize, refine, and enhance with additional feedback. Comments and insights were incorporated as appropriate. The anticipated outcomes of this consultation include stronger alignment between the Con Plan and the Coalition's priorities, enhanced coordination across initiatives, and increased effectiveness of implementation efforts.
UIC Great Cities Institute	Services-Education, Civic Leaders	Non-Homeless Special Needs, Housing Need Assessment	The Project Team engaged UIC Great Cities Institute (GCI) through focus group sessions and the Con Plan's steering committee. GCI offered input on key strengths, weaknesses, opportunities, and threats. In the focus groups The Project Team also presented draft strategies, which GCI helped prioritize, refine, and enhance with additional feedback. Comments and insights were incorporated as appropriate. The anticipated outcomes of this consultation include stronger alignment between the Con Plan and the GCI's priorities, enhanced coordination across initiatives, and increased effectiveness of implementation efforts.
The Chicago Cook Workforce Partnership	Services-Employment, Services-Children, Services-Education	Economic Development, Market Analysis	The Project Team engaged The Chicago Cook Workforce Partnership through focus groups and the Con Plan's steering committee. As a steering committee member, Partnership offered expertise during four key meetings, shaping the Con Plan's strategic direction and recommendations. In the focus groups, the Project Team provided draft strategies, which the Partnership helped refine and prioritize. As a steering committee member, the Partnership offered expertise during four key meetings, shaping the Con Plan's strategic direction and recommendations. The Partnership also participated in a SWOT analysis, collaborative discussions, and prioritization exercises to further refine strategies. Feedback was incorporated as appropriate. The anticipated outcomes of this consultation include stronger alignment between the Con Plan and the Partnership's priorities, improved coordination across initiatives, and enhanced effectiveness of implementation efforts.

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World Business Chicago	Services- Employment, Business and Civic Leaders	Economic Development, Market Analysis	The Project Team engaged World Business Chicago (WBC) through focus groups and the Con Plan’s steering committee. In the focus groups, the Project Team provided draft strategies, which WBC helped refine and prioritize. As a steering committee member, WBC offered expertise during four key meetings, shaping the Con Plan’s strategic direction and recommendations. WBC also participated in a SWOT analysis, collaborative discussions, and prioritization exercises to further refine strategies. Feedback gathered was incorporated as appropriate. The anticipated outcomes of this consultation include stronger alignment between the Con Plan and WBC priorities, improved coordination across initiatives, and enhanced effectiveness of implementation efforts.
Chicago Jobs Council	Services- Employment, Business and Civic Leaders	Economic Development, Market Analysis	The Project Team engaged the Chicago Jobs Council (CJC) through focus group sessions. CJC offered input on key strengths, weaknesses, opportunities, and threats. The Project Team also presented draft strategies, which CJC helped prioritize, refine, and enhance with additional feedback. Comments and insights were incorporated as appropriate. The anticipated outcomes of this consultation include stronger alignment between the Con Plan and CJC priorities, improved coordination across initiatives, and enhanced effectiveness of implementation efforts.
SERCO	Services- Employment, Business Leaders	Economic Development, Market Analysis	The Project Team engaged SERCO through focus group sessions. SERCO offered input on key strengths, weaknesses, opportunities, and threats. The Project Team also presented draft strategies, which SERCO helped prioritize, refine, and enhance with additional feedback. Comments and insights were incorporated as appropriate. The anticipated outcomes of this consultation include stronger alignment between the Con Plan and SERCO's priorities, enhanced coordination across initiatives, and increased effectiveness of implementation efforts.

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Chicagoland CareerPathways	Services-Employment, Business and Civic Leaders	Economic Development, Non-Homeless Special Needs	The Project Team engaged Chicagoland CareerPathways through focus group sessions. Chicagoland CareerPathways offered input on key strengths, weaknesses, opportunities, and threats. The Project Team also presented draft strategies, which Chicagoland CareerPathways helped prioritize, refine, and enhance with additional feedback. Comments and insights were incorporated as appropriate. The anticipated outcomes of this consultation include stronger alignment between the Con Plan and CareerPathway's priorities, enhanced coordination across initiatives, and increased effectiveness of implementation efforts.
Crisis Center For South Suburbia	Services-Victims, Services-Victims of Domestic Violence	Housing Need Assessment, Non-Homeless Special Needs	The Project Team engaged the Crisis Center For South Suburbia through focus group sessions. The Crisis Center offered input on key strengths, weaknesses, opportunities, and threats. The Project Team also presented draft strategies, which the Crisis Center helped prioritize, refine, and enhance with additional feedback. Comments and insights were incorporated as appropriate. The anticipated outcomes of this consultation include stronger alignment between the Con Plan and the Center's priorities, enhanced coordination across initiatives, and increased effectiveness of implementation efforts.
WINGS Program	Services-Victims, Services-Victims of Domestic Violence	Housing Need Assessment, Non-Homeless Special Needs	The Project Team engaged the WINGS Program through focus group sessions and a stakeholder interview with two representatives. During the focus groups, the Project Team presented draft strategies, which WINGS helped refine and prioritize. In the stakeholder interview, WINGS shared input on housing and supportive service needs of victims of domestic violence. Feedback was incorporated as appropriate. The anticipated outcomes of this consultation include stronger alignment between the Con Plan and WINGS' priorities, enhanced coordination across initiatives, and increased effectiveness of implementation efforts.

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South Suburban Council	Public Funded Institution/System of Care	Housing Need Assessment, Non-Homeless Special Needs	The Project Team engaged the South Suburban Council through focus group sessions. The South Suburban Council offered input on key strengths, weaknesses, opportunities, and threats. The Project Team also presented draft strategies, which the South Suburban Council helped prioritize, refine, and enhance with additional feedback. Comments and insights were incorporated as appropriate. The anticipated outcomes of this consultation include stronger alignment between the Con Plan and the Council's priorities, enhanced coordination across initiatives, and increased effectiveness of implementation efforts.
Way Back Inn	Services-Health, Services-Children	Housing Need Assessment, Non-Homeless Special Needs	The Project Team engaged Way Back Inn through focus group sessions. Way Back Inn offered input on key strengths, weaknesses, opportunities, and threats. The Project Team also presented draft strategies, which Way Back Inn helped prioritize, refine, and enhance with additional feedback. Comments and insights were incorporated as appropriate. The anticipated outcomes of this consultation include stronger alignment between the Con Plan and Way Back Inn's priorities, enhanced coordination across initiatives, and increased effectiveness of implementation efforts.
Cabanban, Rubin & Mayberry Commercial Realty	Business Leaders	Economic Development	The Project Team engaged Cabanban, Rubin & Mayberry Commercial Realty (CR&M) through the Con Plan's steering committee, providing an overview of the planning process and regular progress updates. As a committee member, CR&M contributed expertise across four key meetings, helping guide the Con Plan's strategic direction and recommendations. CR&M participated in a SWOT analysis, collaborative discussions, and prioritization exercises to refine strategies. Comments and insights were incorporated as appropriate. The anticipated outcomes of this consultation include stronger alignment between the Con Plan and CR&M priorities, enhanced coordination across initiatives, and increased effectiveness of implementation efforts.

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Illinois Manufacturing Excellence Center	Business Leaders	Economic Development	The Project Team engaged Illinois Manufacturing Excellence Center (IMEC) through focus groups, a stakeholder interview with the president, and the Con Plan’s steering committee. In the focus groups, the Project Team presented draft strategies, which IMEC helped refine and prioritize. During the stakeholder interview, IMEC provided input on relevant strategies, aligned current projects, future initiatives, needed County support, and gaps in the Con Plan. As a steering committee member, IMEC contributed expertise during four key meetings, shaping the Con Plan’s strategic direction and recommendations. IMEC also participated in a SWOT analysis, discussions, and prioritization exercises to refine strategies. Feedback was incorporated as appropriate. The anticipated outcomes of this consultation include stronger alignment between the Con Plan and IMEC priorities, improved coordination across initiatives, and enhanced effectiveness of implementation efforts.
SomerCor	Business Leaders	Economic Development	The Project Team engaged SomerCor through focus groups and the Con Plan’s steering committee. In the focus groups, the Project Team provided draft strategies, which SomerCor helped refine and prioritize. As a steering committee member, SomerCor offered expertise during four key meetings, shaping the Con Plan’s strategic direction and recommendations. SomerCor also participated in a SWOT analysis, collaborative discussions, and prioritization exercises to further refine strategies. Feedback was incorporated as appropriate. The anticipated outcomes of this consultation include stronger alignment between the Con Plan and SomerCor’s priorities, improved coordination across initiatives, and enhanced effectiveness of implementation efforts.

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Women's Business Development Center	Services-Education, Services- Employment	Economic Development	The Project Team engaged the Women's Business Development Center (WBDC) through focus groups and the Con Plan's steering committee. In the focus groups, the Project Team provided draft strategies, which WBDC helped refine and prioritize. As a steering committee member, WBDC offered expertise during four key meetings, shaping the Con Plan's strategic direction and recommendations. WBDC also participated in a SWOT analysis, collaborative discussions, and prioritization exercises to further refine strategies. Feedback was incorporated as appropriate. The anticipated outcomes of this consultation include stronger alignment between the Con Plan and WBDC priorities, improved coordination across initiatives, and enhanced effectiveness of implementation efforts.
Metra	Regional organization, Others, Planning organization	Economic Development	The Project Team engaged Metra through focus group sessions. Metra offered input on key strengths, weaknesses, opportunities, and threats. The Project Team also presented draft strategies, which Metra helped prioritize, refine, and enhance with additional feedback. Comments and insights were incorporated as appropriate. The anticipated outcomes of this consultation include stronger alignment between the Con Plan and Metra's priorities, enhanced coordination across initiatives, and increased effectiveness of implementation efforts.
KLY Development	Business Leaders	Economic Development	The Project Team engaged KLY Development through the Con Plan's steering committee, providing an overview of the planning process and regular progress updates. As a committee member, KLY contributed expertise across four key meetings, helping guide the Con Plan's strategic direction and recommendations. KLY participated in a SWOT analysis, collaborative discussions, and prioritization exercises to refine strategies. Comments and insights were incorporated as appropriate. The anticipated outcomes of this consultation include stronger alignment between the Con Plan and KLY priorities, enhanced coordination across initiatives, and increased effectiveness of implementation efforts.

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John and Katherine T MacArthur Foundation	Foundation, Business and Civic Leaders	Non-Homeless Special Needs, Housing Need Assessment, Economic Development	The Project Team engaged the John and Katherine T. MacArthur Foundation through the Con Plan’s steering committee, providing an overview of the planning process and regular progress updates. As a committee member, the MacArthur Foundation contributed expertise across four key meetings, helping guide the Con Plan’s strategic direction and recommendations. The MacArthur Foundation participated in a SWOT analysis, collaborative discussions, and prioritization exercises to refine strategies. Comments and insights were incorporated as appropriate. The anticipated outcomes of this consultation include stronger alignment between the Con Plan and the Foundation's priorities, enhanced coordination across initiatives, and increased effectiveness of implementation efforts.
Chicago Community Loan Fund	Community Development Financial Institution, Services-Housing	Economic Development, Housing Need Assessment, Market Analysis	The Project Team engaged the Chicago Community Loan Fund (CCLF) through focus groups and the Con Plan’s steering committee. In the focus groups, the Project Team provided an overview of the planning process and draft strategies, which CCLF helped refine and prioritize. As a steering committee member, CCLF offered expertise during four key meetings, shaping the Con Plan’s strategic direction and recommendations. CCLF also participated in a SWOT analysis, collaborative discussions, and prioritization exercises to further refine strategies. Comments and insights were incorporated as appropriate. The anticipated outcomes of this consultation include stronger alignment between the Con Plan and CCLF priorities, improved coordination across initiatives, and enhanced effectiveness of implementation efforts.
University of Chicago	Major Employer, Civic Leaders	Economic Development, Housing Need Assessment	The Project Team engaged the University of Chicago (UC) through the Con Plan’s steering committee, providing an overview of the planning process and regular progress updates. As a committee member, UC contributed expertise across four key meetings, helping guide the Con Plan’s strategic direction and recommendations. UC participated in a SWOT analysis, collaborative discussions, and prioritization exercises to refine strategies. Comments and insights were incorporated as appropriate. The anticipated outcomes of this consultation include stronger alignment between the Con Plan and UC priorities, enhanced coordination across initiatives, and increased effectiveness of implementation efforts.

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Cook County Land Bank Authority (CCLBA)	Other government-County	Economic Development, Housing Need Assessment, Market Analysis	The Project Team engaged the Cook County Land Bank Authority (CCLBA) through focus group sessions and a stakeholder interview with the executive director. During the focus groups, the Project Team presented an overview of the planning process and draft strategies, which CCLBA helped refine and prioritize. In the stakeholder interview, CCLBA shared input on relevant strategies, aligned current projects, future initiatives, needed County support, and gaps in the Con Plan. Comments and insights were incorporated as appropriate. The anticipated outcomes of this consultation include stronger alignment between the Con Plan and CCLBA priorities, enhanced coordination across initiatives, and increased effectiveness of implementation efforts.
Cook County Economic Development Advisory Committee	Business and Civic Leaders, Other government-County	Economic Development	The Project Team engaged the Cook County Economic Development Advisory Committee (EDAC) through the Con Plan’s steering committee, providing an overview of the planning process and regular progress updates. As a committee member, EDAC contributed expertise across four key meetings, helping guide the Con Plan’s strategic direction and recommendations. EDAC participated in a SWOT analysis, collaborative discussions, and prioritization exercises to refine strategies. Comments and insights were incorporated as appropriate. The anticipated outcomes of this consultation include stronger alignment between the Con Plan and EDAC priorities, enhanced coordination across initiatives, and increased effectiveness of implementation efforts.
Chicago Community Trust	Foundation, Business and Civic Leaders	Housing Need Assessment, Economic Development, Homelessness Strategy, Non-Homeless Special Needs, Market Analysis, Anti-poverty Strategy	The Project Team engaged the Chicago Community Trust (CCT) through the Con Plan’s steering committee, providing an overview of the planning process and regular progress updates. As a committee member, CCT contributed expertise across four key meetings, helping guide the Con Plan’s strategic direction and recommendations. CCT participated in a SWOT analysis, collaborative discussions, and prioritization exercises to refine strategies. Comments and insights were incorporated as appropriate. The anticipated outcomes of this consultation include stronger alignment between the Con Plan and CCT priorities, enhanced coordination across initiatives, and increased effectiveness of implementation efforts.

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Village of Hoffman Estates	Other government-Local	Economic Development	The Project Team engaged the Village of Hoffman Estates through focus group sessions. The Village offered input on key strengths, weaknesses, opportunities, and threats. The Project Team also presented draft strategies, which the Village helped prioritize, refine, and enhance with additional feedback. Comments and insights were incorporated as appropriate. The anticipated outcomes of this consultation include stronger alignment between the Con Plan and the Village's priorities, enhanced coordination across initiatives, and increased effectiveness of implementation efforts.
Village of Schaumburg	Other government-Local	Economic Development	The Project Team engaged the Village of Schaumburg through focus group sessions. The Village offered input on key strengths, weaknesses, opportunities, and threats. The Project Team also presented draft strategies, which the Village helped prioritize, refine, and enhance with additional feedback. Comments and insights were incorporated as appropriate. The anticipated outcomes of this consultation include stronger alignment between the Con Plan and the Village's priorities, enhanced coordination across initiatives, and increased effectiveness of implementation efforts.
CSH	Services-Housing, Private Sector Banking/Financing	Homelessness Strategy	The Project Team engaged CSH through focus group sessions. CSH offered input on key strengths, weaknesses, opportunities, and threats. The Project Team also presented draft strategies, which CSH helped prioritize, refine, and enhance with additional feedback. Comments and insights were incorporated as appropriate. The anticipated outcomes of this consultation include stronger alignment between the Con Plan and CSH's priorities, enhanced coordination across initiatives, and increased effectiveness of implementation efforts.
Regional Transportation Authority	Regional organization, Major Employer	Non-Homeless Special Needs, Economic Development	The Project Team engaged the Regional Transportation Authority (RTA) through focus group sessions. RTA offered input on key strengths, weaknesses, opportunities, and threats. The Project Team also presented draft strategies, which RTA helped prioritize, refine, and enhance with additional feedback. Comments and insights were incorporated as appropriate. The anticipated outcomes of this consultation include stronger alignment between the Con Plan and RTA's priorities, enhanced coordination across initiatives, and increased effectiveness of implementation efforts.

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Arts Alliance Illinois	Business and Civic Leaders, Regional organization	Economic Development	The Project Team engaged Arts Alliance Illinois through focus group sessions. Arts Alliance Illinois offered input on key strengths, weaknesses, opportunities, and threats. The Project Team also presented draft strategies, which Arts Alliance Illinois helped prioritize, refine, and enhance with additional feedback. Comments and insights were incorporated as appropriate. The anticipated outcomes of this consultation include stronger alignment between the Con Plan and the Alliance's priorities, enhanced coordination across initiatives, and increased effectiveness of implementation efforts.
Illinois Manufacturing Association	Business Leaders	Economic Development	The Project Team engaged Illinois Manufacturing Association (IMA) through focus group sessions. IMA offered input on key strengths, weaknesses, opportunities, and threats. The Project Team also presented draft strategies, which IMA helped prioritize, refine, and enhance with additional feedback. Comments and insights were incorporated as appropriate. The anticipated outcomes of this consultation include stronger alignment between the Con Plan and IMA's priorities, enhanced coordination across initiatives, and increased effectiveness of implementation efforts.
Southland Development Authority	Business and Civic Leaders, Private Sector Banking/Financing	Economic Development	The Project Team engaged Southland Development Authority (SDA) through focus group sessions. SDA offered input on key strengths, weaknesses, opportunities, and threats. The Project Team also presented draft strategies, which SDA helped prioritize, refine, and enhance with additional feedback. Comments and insights were incorporated as appropriate. The anticipated outcomes of this consultation include stronger alignment between the Con Plan and SDA's priorities, enhanced coordination across initiatives, and increased effectiveness of implementation efforts.
Chicago Jobs Council	Business and Civic Leaders	Economic Development, Anti-poverty Strategy	The Project Team engaged the Chicago Jobs Council (CJC) through focus group sessions. CJC offered input on key strengths, weaknesses, opportunities, and threats. The Project Team also presented draft strategies, which CJC helped prioritize, refine, and enhance with additional feedback. Comments and insights were incorporated as appropriate. The anticipated outcomes of this consultation include stronger alignment between the Con Plan and CJC's priorities, enhanced coordination across initiatives, and increased effectiveness of implementation efforts.

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Village of Morton Grove	Other government-Local	Economic Development	The Project Team engaged the Village of Morton Grove through focus group sessions. The Village offered input on key strengths, weaknesses, opportunities, and threats. The Project Team also presented draft strategies, which the Village helped prioritize, refine, and enhance with additional feedback. Comments and insights were incorporated as appropriate. The anticipated outcomes of this consultation include stronger alignment between the Con Plan and the Village's priorities, enhanced coordination across initiatives, and increased effectiveness of implementation efforts.
Digital Equity for Cook County Government	Other government-County, Services-Narrowing the Digital Divide	Economic Development	The Project Team engaged Digital Equity for Cook County Government through focus group sessions. Digital Equity offered input on key strengths, weaknesses, opportunities, and threats. The Project Team also presented draft strategies, which Digital Equity helped prioritize, refine, and enhance with additional feedback. Comments and insights were incorporated as appropriate. The anticipated outcomes of this consultation include stronger alignment between the Con Plan and Digital Equity's priorities, enhanced coordination across initiatives, and increased effectiveness of implementation efforts.
REVA Development	Housing	Housing Need Assessment, Market Analysis	The Project Team consulted REVA Development through a stakeholder interview with two representatives. REVA Development shared input on housing market opportunities, challenges, and trends. Feedback was incorporated as appropriate. The anticipated outcomes of this consultation include stronger alignment between the Con Plan and REVA Development's priorities, enhanced coordination across initiatives, and increased effectiveness of implementation efforts.
Wingspan Development Group	Housing	Housing Need Assessment, Non-Homeless Special Needs, Market Analysis	The Project Team consulted Wingspan Development Group through a stakeholder interview. Wingspan shared input on housing market opportunities, challenges, and trends. Feedback was incorporated as appropriate. The anticipated outcomes of this consultation include stronger alignment between the Con Plan and Wingspan's priorities, enhanced coordination across initiatives, and increased effectiveness of implementation efforts.

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Full Circle Communities	Housing	Housing Need Assessment, Non-Homeless Special Needs	The Project Team consulted Full Circle Communities (FCC) through a stakeholder interview with a project manager. FCC shared input on local development projects and challenges, market demand, and ways local governments can support housing development. Feedback was incorporated as appropriate. The anticipated outcomes of this consultation include stronger alignment between the Con Plan and FCC's priorities, enhanced coordination across initiatives, and increased effectiveness of implementation efforts.
Comcast	Services-Broadband Internet Service Providers Services	Economic Development	The Project Team consulted Comcast through a stakeholder interview with two representatives. Comcast shared input on broadband infrastructure, digital literacy needs, and strategies to increase internet access. Feedback was incorporated as appropriate. The anticipated outcomes of this consultation include stronger alignment between the Con Plan and Comcast's priorities, enhanced coordination across initiatives, and increased effectiveness of implementation efforts.
Chicago Lighthouse	Services-Persons with Disabilities, Services-Education, Services-Children	Non-Homeless Special Needs, Housing Need Assessment	The Project Team consulted the Chicago Lighthouse through a stakeholder interview with three representatives. The Chicago Lighthouse shared input on housing and supportive service needs, as well as relevant programs. Feedback was incorporated as appropriate. The anticipated outcomes of this consultation include stronger alignment between the Con Plan and the Chicago Lighthouse's priorities, enhanced coordination across initiatives, and increased effectiveness of implementation efforts.
AIDS Foundation Chicago	Services-Persons with HIV/AIDS	HOPWA Strategy, Non-Homeless Special Needs, Housing Need Assessment	The Project Team consulted the AIDS Foundation Chicago (AFC) through a stakeholder interview with the president. The AIDS Foundation shared input on housing and supportive service needs, especially for people living with HIV/AIDS. Feedback was incorporated as appropriate. The anticipated outcomes of this consultation include stronger alignment between the Con Plan and AFC's priorities, enhanced coordination across initiatives, and increased effectiveness of implementation efforts.

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Cook County Department of Transportation and Highways (DoTH)	Other government-County	Non-Homeless Special Needs	The Project Team engaged Cook County Department of Transportation and Highways (DoTH) through focus group sessions and a stakeholder interview with two representatives. The Village offered input on key strengths, weaknesses, opportunities, and threats. In the stakeholder interview, DoTH shared input on public improvement needs, current and future initiatives, and needed County support. Feedback was incorporated as appropriate. The anticipated outcomes of this consultation include stronger alignment between the Con Plan and DoTH's priorities, enhanced coordination across initiatives, and increased effectiveness of implementation efforts.
Cook County Emergency Management and Regional Security	Other government-County, Agency-Emergency Management, Agency-Managing Flood Prone Areas	Non-Homeless Special Needs	The Project Team consulted Cook County Emergency Management and Regional Security (EMRS) through a stakeholder interview with two representatives. EMRS shared input on flood risks, current and future initiatives to improve preparedness, and local partnerships. Feedback was incorporated as appropriate. The anticipated outcomes of this consultation include stronger alignment between the Con Plan and EMRS' priorities, enhanced coordination across initiatives, and increased effectiveness of implementation efforts.
PNC Bank	Business Leaders	Economic Development	The Project Team engaged PNC Bank through focus group sessions. PNC Bank offered input on key strengths, weaknesses, opportunities, and threats. The Project Team also presented draft strategies, which PNC Bank helped prioritize, refine, and enhance with additional feedback. Comments and insights were incorporated as appropriate. The anticipated outcomes of this consultation include stronger alignment between the Con Plan and PNC's priorities, enhanced coordination across initiatives, and increased effectiveness of implementation efforts.

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Illinois State Representative Michelle Mussman	Civic Leaders, Other government-State	Economic Development, Non-Homeless Special Needs	The Project Team engaged the Office of Illinois State Representative Michelle Mussman through focus group sessions. The Office offered input on key strengths, weaknesses, opportunities, and threats. The Project Team also presented draft strategies, which the Office helped prioritize, refine, and enhance with additional feedback. Comments and insights were incorporated as appropriate. The anticipated outcomes of this consultation include stronger alignment between the Con Plan and the Office's priorities, enhanced coordination across initiatives, and increased effectiveness of implementation efforts.
League of Women Voters	Business and Civic Leaders	Non-Homeless Special Needs	The Project Team engaged the League of Women Voters (LWV) through focus group sessions. LWV offered input on key strengths, weaknesses, opportunities, and threats. The Project Team also presented draft strategies, which LWV helped prioritize, refine, and enhance with additional feedback. Comments and insights were incorporated into the Con Plan as appropriate. The anticipated outcomes of this consultation include stronger alignment between the Con Plan and LWV's priorities, enhanced coordination across initiatives, and increased effectiveness of implementation efforts.
Ford Heights Community Service Organization	Services-homeless, Services-Education, Services-Employment	Homelessness Strategy	The Project Team engaged Ford Heights Community Service Organization (FHCSO) through focus group sessions. FHCSO offered input on key strengths, weaknesses, opportunities, and threats. The Project Team also presented draft strategies, which FHCSO helped prioritize, refine, and enhance with additional feedback. Comments and insights were incorporated as appropriate. The anticipated outcomes of this consultation include stronger alignment between the Con Plan and FHCSO's priorities, enhanced coordination across initiatives, and increased effectiveness of implementation efforts.

Agency/Group/ Organization	Agency/Group/ Organization Type	Section of the Plan	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation?
Ingalls Development Foundation	Health Agency, Services-Health, Foundation	Non-Homeless Special Needs	The Project Team engaged the Ingalls Development Foundation through focus group sessions. Ingalls offered input on key strengths, weaknesses, opportunities, and threats. The Project Team also presented draft strategies, which Ingalls helped prioritize, refine, and enhance with additional feedback. Comments and insights were incorporated as appropriate. The anticipated outcomes of this consultation include stronger alignment between the Con Plan and the Foundation's priorities, enhanced coordination across initiatives, and increased effectiveness of implementation efforts.
Community Investment Corporation (CIC)	Private Sector Banking/Financing, Services-Education	Housing Need Assessment, Economic Development	The Project Team engaged the Community Investment Corporation (CIC) through the Con Plan's steering committee, providing an overview of the planning process and regular progress updates. As a committee member, CIC contributed expertise across four key meetings, helping guide the Con Plan's strategic direction and recommendations. CIC participated in a SWOT analysis, collaborative discussions, and prioritization exercises to refine strategies. Comments and insights were incorporated as appropriate. The anticipated outcomes of this consultation include stronger alignment between the Con Plan and CIC priorities, enhanced coordination across initiatives, and increased effectiveness of implementation efforts.
Village of Broadview	Other government-Local	Economic Development, Housing Need Assessment	The Project Team engaged the Village of Broadview through the Con Plan's steering committee, providing an overview of the planning process and regular progress updates. As a committee member, the Village contributed their expertise helping guide the Con Plan's strategic direction and recommendations. The Village participated in a SWOT analysis, collaborative discussions, and prioritization exercises to refine strategies. Comments and insights were incorporated as appropriate. The anticipated outcomes of this consultation include stronger alignment between the Con Plan and the Village's priorities, enhanced coordination across initiatives, and increased effectiveness of implementation efforts.

Agency/Group/ Organization	Agency/Group/ Organization Type	Section of the Plan	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation?
ComEd	Business Leaders	Economic Development	The Project Team engaged ComEd through focus group sessions. ComEd offered input on key strengths, weaknesses, opportunities, and threats. The Project Team also presented draft strategies, which ComEd helped prioritize, refine, and enhance with additional feedback. Comments and insights were incorporated as appropriate. The anticipated outcomes of this consultation include stronger alignment between the Con Plan and ComEd's priorities, enhanced coordination across initiatives, and increased effectiveness of implementation efforts.
Allies for Community Business	Business Leaders, Private Sector Banking/Financing	Economic Development, Market Analysis	The Project Team engaged Allies for Community Business (ACB) through focus group sessions. ACB offered input on key strengths, weaknesses, opportunities, and threats. The Project Team also presented draft strategies, which ACB helped prioritize, refine, and enhance with additional feedback. Comments and insights were incorporated as appropriate. The anticipated outcomes of this consultation include stronger alignment between the Con Plan and ACB's priorities, enhanced coordination across initiatives, and increased effectiveness of implementation efforts.
Berwyn Development Corporation	Neighborhood Organization, Business and Civic Leaders	Economic Development, Market Analysis	The Project Team engaged the Berwyn Development Corporation (BDC) through focus group sessions. BDC offered input on key strengths, weaknesses, opportunities, and threats. The Project Team also presented draft strategies, which BDC helped prioritize, refine, and enhance with additional feedback. Comments and insights were incorporated as appropriate. The anticipated outcomes of this consultation include stronger alignment between the Con Plan and BDC's priorities, enhanced coordination across initiatives, and increased effectiveness of implementation efforts.
Cook County Department of Public Health	Other government- County	Lead-based Paint Strategy	The Project Team consulted Cook County Department of Public Health (DPH) through a stakeholder interview with a representative. DPH shared input on lead based paint risk, remediation programs, and associated funding sources. Feedback was incorporated as appropriate. The anticipated outcomes of this consultation include stronger alignment between the Con Plan and DPH's priorities, enhanced coordination across initiatives, and increased effectiveness of implementation efforts.

Agency/Group/ Organization	Agency/Group/ Organization Type	Section of the Plan	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation?
Cicero Housing Authority	Housing, Other government-Local, PHA, Services-Elderly Persons, Services-Persons with Disabilities	Public Housing Needs, Housing Need Assessment, Market Analysis	The Project Team reached out to the Cicero Housing Authority (Cicero HA) for a stakeholder interview. Though an interview could not be conducted, the Cicero HA provided written feedback via email to relevant prompts in the Consolidated Plan related to the Cicero HA's functions and needs of residents. Feedback was incorporated as appropriate. The anticipated outcomes of this consultation include stronger alignment between the Con Plan and Cicero HA's priorities, enhanced coordination across initiatives, and increased effectiveness of implementation efforts.

Table 1 – Agencies, groups, organizations who participated

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

Prior to the launch of Uplift Cook, DPD developed a comprehensive list of relevant stakeholder agencies and individuals including contact information. This list comprised over 250 individuals representing:

- Regional, state, countywide, sub-regional, municipal, and neighborhood-level entities
- Public, private, and nonprofit sectors
- Economic development, market and affordable housing, homelessness, workforce development, infrastructure, and community development fields
- Planning, policy, education, development, and service provision sectors
- Organizations focused on low/moderate-income and other special needs populations (i.e., senior citizen, homeless, disabled, domestic violence victims, persons living with HIV/AIDS, persons with limited English proficiency)

This list was comprehensive and reflective of all agency types. A majority of these individuals participated in the development of the Con Plan via steering committee meetings, focus groups, and/or stakeholder interviews conducted from fall 2024 through spring 2025. The Project Team also sought feedback on a draft of Uplift Cook from those on the stakeholder list via email in May 2025. As a result, all relevant stakeholder groups were consulted in the development of the Con Plan.

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

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Cook County Policy Roadmap (2024-2027)	Cook County Offices Under the President	The goals, strategies, and priorities outlined in the Policy Roadmap directly informed Uplift Cook as it relates to housing and homelessness, community development, infrastructure, workforce development, and economic development. The Policy Roadmap is the overarching policy guidance document for the County and heavily informed the strategies and priorities of the Con Plan.
Cook County Bureau of Economic Development Strategic Plan (2024-2027)	Cook County Bureau of Economic Development	The goals, strategies, and priorities outlined in this strategic plan directly informed Uplift Cook as it relates to housing, workforce development, infrastructure, and economic development. The BED Strategic Plan overlaps strongly with the pillars of Uplift Cook and significantly influenced the development of its strategies and priorities.
ON TO 2050 (Updated 2022)	Chicago Metropolitan Agency for Planning	ON TO 2050 is a comprehensive regional plan organized around five key chapters: community, prosperity, environment, governance, and mobility. The multidisciplinary, regional nature of ON TO 2050 made the plan a valuable source of input for strategies across all topic areas.
2019-2022 Strategic Plan	Alliance to End Homelessness	The goals, strategies, and priorities outlined in this strategic plan directly informed Uplift Cook as it relates to housing and homelessness, and community development. The broad policies and goals of the plan remain relevant today and aim to guide investment toward addressing homelessness.
Cook County Health Strategic Plan 2023-2025	Cook County Health	The goals, strategies, and priorities outlined in this strategic plan directly informed Uplift Cook as it relates to housing and homelessness, infrastructure, and community development. The strategic plan provides data and insights on health, community development, and workforce development based on a robust public engagement process.

Chicagoland's Economic Landscape (2023)	Greater Chicagoland Economic Partnership (GCEP)	The goals, strategies, and priorities outlined in this regional report directly informed Uplift Cook as it relates to economic development, workforce development, and infrastructure. The report identifies key growing industries, infrastructure assets, and economic trends for the region.
Open for Business: Illinois' 2024 Economic Growth Plan	Illinois Department of Commerce and Economic Opportunity	The goals, strategies, and priorities outlined in this plan directly informed Uplift Cook as it relates to economic development. The Economic Growth Plan for the state outlines key economic trends, strategies for business development, and burgeoning economic sectors poised for future growth.
Cook County Department of Transportation and Highways 5-Year Improvement Plan (2025-2029)	Cook County Department of Transportation and Highways	The goals, strategies, and priorities outlined in this plan directly informed Uplift Cook as it relates to infrastructure. This plan outlines priorities for infrastructure investments during the planning period.
Cook County Transit Plan (2023)	Cook County Department of Transportation and Highways	The goals, strategies, and priorities outlined in this transit plan directly informed Uplift Cook as it relates to infrastructure. The transit plan seeks to focus priority on transit and alternative modes of transportation, support the region's role as a freight capital, and maintain and modernize existing infrastructure.
Cook County Housing Policy Brief (2024)	Cook County Office Under the President	The goals, strategies, and priorities outlined in this brief directly informed Uplift Cook as it relates to housing and homelessness. The brief provides relevant strategies to address rising housing costs and homelessness and increase coordination among partner organizations.

Table 2 – Other local / regional / federal planning efforts

Describe cooperation and coordination with other public entities, including the State and any adjacent units of general local government, in the implementation of the Consolidated Plan (91.215(I))

DPD and other members of the Project Team identified applicable government entities from whom to seek input on the draft Con Plan. These entities included County departments such as BED, Department of Emergency Management and Regional Security, DoTH and DPD, as well as MWRD, City of Chicago, OPHA, City Colleges of Chicago, and the Cook County Land Bank Authority. Representatives of these entities participated in interviews, focus groups, and steering committee meetings, and provided additional support or existing planning documents for consideration, as applicable.

Municipalities within the County such as the Villages of Morton Grove, Schaumburg, Arlington Heights, Lemont, Park Forest, Mount Prospect, and Hoffman Estates, as well the regional planning entity Chicago Metropolitan Planning Agency (CMAP), SSMMA, Chicago Area Fair Housing Alliance, participated in focus groups and/or steering committee meetings to provide input on the plan's priorities and strategies. State-level agencies including the Illinois Housing Development Authority and Illinois Office of Broadband were also consulted during the process.

Development of the draft Con Plan was coordinated with representatives from HUD to ensure compliance and alignment with data and narrative responses provided. Finally, the Con Plan will be presented to and considered by EDAC, Cook County Board of Commissioners, and the Cook County President prior to its final submittal.

Narrative (optional):

The consultations and feedback from these and other groups during the Con Plan process built on a foundation of public input from the numerous plans developed by the County, nonprofit organizations, and other governmental entities that informed the draft Con Plan.

PR-15 Citizen Participation – 91.105, 91.115, 91.200(c) and 91.300(c)

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

To effectively engage a diverse range of stakeholders, the Uplift Cook Project Team developed an engagement and communications strategy that leveraged a mix of in-person and digital methods across several participation formats. A steering committee composed of representatives from regional planning bodies, community organizations and nonprofits, business leaders, practitioners, and advocacy groups served as the primary advisory body during the plan’s development. Steering committee member organizations were selected to ensure representation across the county’s diverse geographies, residents, and communities. Uplift Cook’s steering committee met four times during the process, including three in-person, interactive workshops and one virtual meeting with breakout group discussions.

In addition to the steering committee, the Project Team facilitated 10 focus groups aligning with the plan’s 5 topic areas of housing and homelessness, community development, economic development, workforce development, and infrastructure. Similar to the steering committee, focus group participants encompassed stakeholders representing the county’s diverse communities and residents. Over 250 individuals attended across the 10 focus groups, with 165 attendees representing organizations or institutions outside of Cook County government.

The Project Team also conducted 20 interviews with members of Suburban Cook County’s Continuum of Care, public housing authorities, publicly funded institutions and systems of care that may discharge persons into homelessness, business and civic leaders, local health and welfare agencies, broadband internet service providers, adjacent units of local government, and individual steering committee members.

The draft Con Plan will be shared for feedback during a 30-day public comment period with members of the public, steering committee members, Cook County’s four Councils of Government, Cook County HOME Consortium, Suburban Cook County’s Continuum of Care, and other stakeholders. Finally, the plan leverages the considerable public participation efforts undertaken to develop the Cook County 2024-2027 Policy Roadmap for the Offices Under the President and the Cook County Bureau of Economic Development 2024-2027 Strategic Plan.

Throughout the planning process, stakeholders provided critical input regarding prospective goals, priorities, and strategies, which informed the plan that was ultimately developed.

Citizen Participation Outreach

[Pending revisions following public hearings]

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (if applicable)
	Public Comment Period	Non-targeted/ broad community	The public comment period for the Con Plan will be held for 30 days from May 2, 2025 to June 2, 2025.	[pending public comment period]		
	Public Hearing	Non-targeted/ broad community	Public Hearing at Economic Development Advisory Committee will be held on May 7, 2025.	[pending public comment period]		
	Public Hearing	Non-targeted/ Broad Community	Public Hearing location, date, and time is TBD	pending public comment period		

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (if applicable)
	Public Hearing	Non-targeted/ broad community	This will be a meeting of the Cook County Board of Commissioners on July 24, 2025.	[pending meeting]		
	Public Comment Period	Non-targeted/ broad community	The public comment period for the Annual Action Plan will be held for 30 days from May 2, 2025 – June 2, 2025.	[pending public comment period]		

Table 3 – Citizen Participation Outreach

Needs Assessment (NA)

NA-05 Overview

Needs Assessment Overview

The Project Team completed a comprehensive needs assessment that included extensive analysis of demographic, housing, and economic data; stakeholder engagement to understand strengths, weaknesses, opportunities, and threats related to the plan's topic areas; and a review of recent County, regional, and state plans and policy initiatives. The needs assessment informed DPD's goals, priorities, and strategies related to affordable housing and community development, including efforts to address homelessness and special needs populations.

As local needs continue to far exceed available resources, efficient and effective distribution of funds is critical. DPD continues to work closely with public and private partners to leverage existing funding and identify additional resources to spur investment. The strategies and action items outlined in the draft Con Plan will help ensure that funds are allocated in a coordinated manner that maximizes impact.

Summarized by topic area, priority needs that informed the plan's strategies include:

- 1) **Housing and Homelessness:** Supporting development of additional units of affordable housing, particularly for low-income households earning less than 60% of area median income (AMI); engaging local municipalities to incentivize affordable housing development; assessing structural challenges increase property tax burdens in communities with lower incomes relative to home values; addressing conditions related to an aging housing stock; identifying further opportunities for temporary and permanent housing solutions for residents experiencing homelessness; increasing connections between transit, jobs, and affordable housing; and continuing to streamline and improve comprehensive housing and supportive service referral systems.
- 2) **Community Development:** Building capacity of local nonprofits and governments; improving access to health services, particularly in areas of the south and west suburbs with high need; addressing geographic disparities in access to healthy foods; expanding broadband infrastructure and digital education and access; and protecting against severe weather events including flooding and extreme heat.
- 3) **Economic Development:** Continuing to leverage the economic strengths of the region's traded industry clusters with a focus on key and emerging industries; supporting small and first-generation businesses; promoting regional collaboration through GCEP and other partnerships between public, private, and nonprofit entities; and promoting economic stability for all residents.
- 4) **Workforce Development:** Supporting diversified career pathways through apprenticeships, technical training, and higher education; addressing barriers to employment such as access to childcare and transportation; and optimizing systems for collaboration and data-sharing between workforce providers to more effectively support clients.

- 5) **Infrastructure:** Addressing challenges related to infrastructure age; reducing project backlog; increasing communication around project progress and successes; leveraging statewide commitments to support energy infrastructure investments and energy efficiency in commercial developments and public facilities; and proactively protecting critical freshwater resources.

NA-10 Housing Needs Assessment - 24 CFR 91.205 (a,b,c)

Summary of Housing Needs

Demographics	Base Year: 2017	Most Recent Year: 2022	% Change
Population	2,577,104	2,503,810	-2.8%
Households	909,772	936,340	2.9%
Median Income	\$59,426	\$78,304	31.8%

Table 4 - Housing Needs Assessment Demographics

Data Source: 2017 ACS 5 Year; 2022 Esri Business Analyst

Number of Households Table

	0-30% HAMFI	>30-50% HAMFI	>50- 80% HAMFI	>80- 100% HAMFI	>100% HAMFI
Total Households	88,377	79,888	112,380	66,232	268,235
Small Family Households	24,462	24,696	43,700	27,721	142,190
Large Family Households	6,441	7,187	11,292	7,934	28,894
Household contains at least one person 62-74 years of age	21,786	20,566	28,480	17,820	67,335
Household contains at least one person age 75 or older	19,545	18,474	16,887	9,295	23,520
Households with one or more children 6 years old or younger	12,752	11,143	16,657	9,229	19,667

Table 5 - Total Households Table

Data Source: 2016-2020 CHAS

Housing Needs Summary Tables

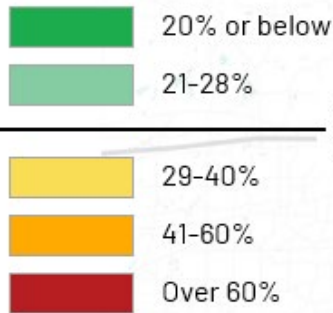
1. Housing Problems (Households with one of the listed needs)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Substandard Housing - Lacking complete plumbing or kitchen facilities	1,809	430	422	195	2,856	300	242	202	267	1,011
Severely Overcrowded - With >1.51 people per room (and complete kitchen and plumbing)	1,004	679	760	158	2,601	139	380	333	142	994
Overcrowded - With 1.01-1.5 people per room (and none of the above problems)	1,752	1,141	1,391	535	4,819	626	1,076	1,692	897	4,291
Housing cost burden greater than 50% of income (and none of the above problems)	27,245	7,584	1,204	265	36,298	27,092	13,306	6,911	1,561	48,870
Housing cost burden greater than 30% of income (and none of the above problems)	4,133	15,764	9,622	1,348	30,867	6,460	14,621	22,049	9,052	52,182
Zero/negative Income (and none of the above problems)	4,758	0	0	0	4,758	3,905	0	0	0	3,905

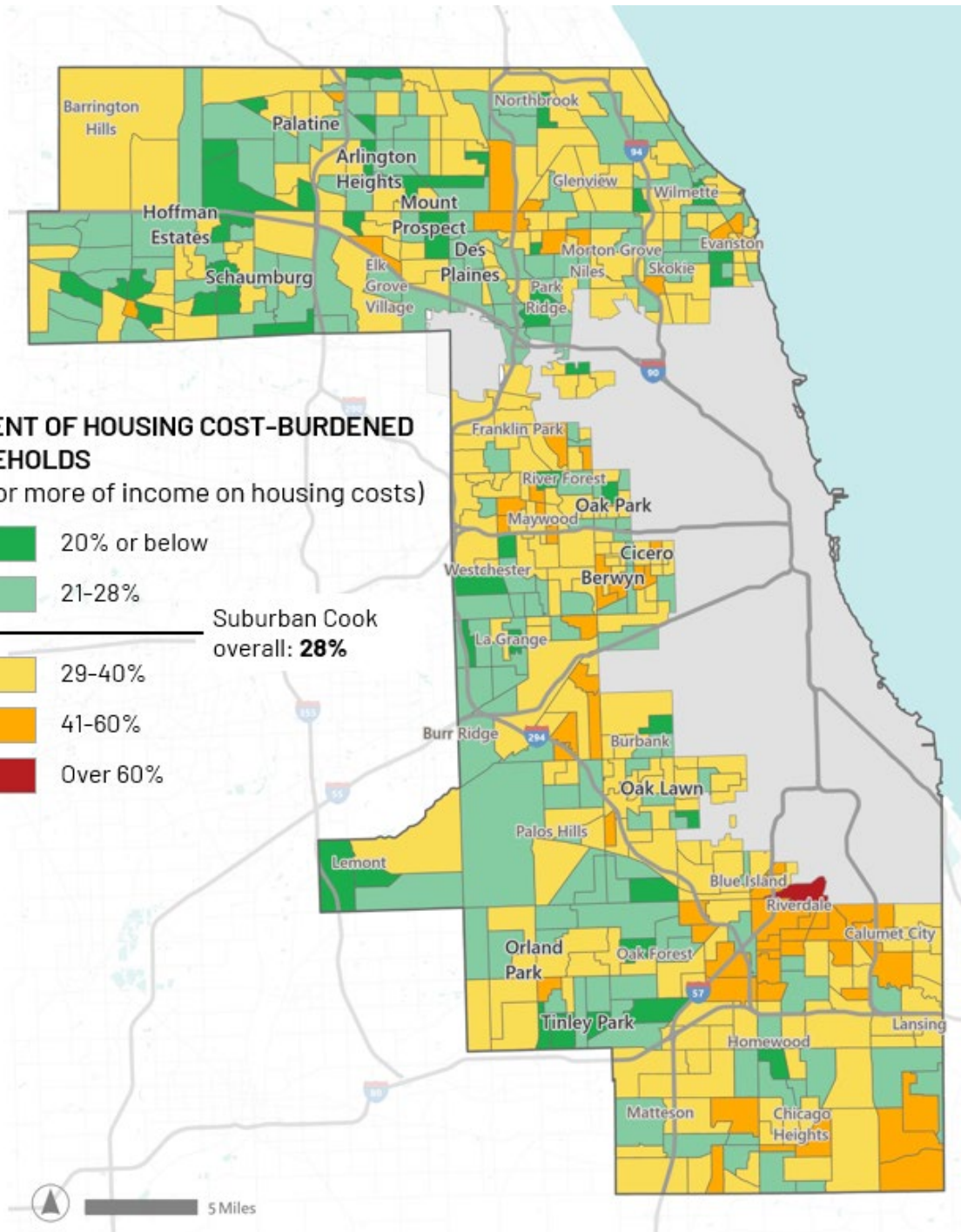
Table 6 – Housing Problems Table

Source: CHAS 2016-2020

PERCENT OF HOUSING COST-BURDENED HOUSEHOLDS
(30% or more of income on housing costs)



Suburban Cook
overall: **28%**



Source: 2018-2022 ACS 5-Year estimates

2. Housing Problems 2 (Households with one or more Severe Housing Problems: Lacks kitchen or complete plumbing, severe overcrowding, severe cost burden)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80- 100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80- 100% AMI	Total
NUMBER OF HOUSEHOLDS										
Having 1 or more of four housing problems	31,804	9,824	3,798	1,154	46,580	28,152	14,996	9,148	2,870	55,166
Having none of four housing problems	13,896	21,962	32,220	15,701	83,779	14,437	33,071	67,188	46,537	161,233
Household has negative income, but none of the other housing problems	0	0	0	0	0	0	0	0	0	0

Table 7 – Housing Problems 2

Data Source:

2016-2020 CHAS

3. Cost Burden > 30%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
NUMBER OF HOUSEHOLDS								
Small Related	12,744	9,984	4,302	27,030	7,619	7,926	11,799	27,344
Large Related	3,380	1,759	832	5,971	2,237	2,588	2,710	7,535
Elderly	10,798	6,877	2,531	20,206	19,520	14,519	9,918	43,957
Other	8,093	5,929	3,740	17,762	4,990	3,681	4,881	13,552
Total need by income	35,015	24,549	11,405	70,969	34,366	28,714	29,308	92,388

Table 8 – Cost Burden > 30%

Data Source: 2016-2020 CHAS

4. Cost Burden > 50%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
NUMBER OF HOUSEHOLDS								
Small Related	0	0	3,000	3,000	6,643	3,772	0	10,415
Large Related	0	0	397	397	1,574	970	441	2,985
Elderly	8,792	2,771	631	12,194	14,939	6,880	2,312	24,131
Other	0	7,376	1,813	9,189	4,523	0	0	4,523
Total need by income	8,792	10,147	5,841	24,780	27,679	11,622	2,753	42,054

Table 9 – Cost Burden > 50%

Data Source: 2016-2020 CHAS

5. Crowding (More than one person per room)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Single family households	2,556	1,538	1,843	423	6,360	539	1,238	1,421	653	3,851
Multiple, unrelated family households	127	265	217	160	769	217	217	598	390	1,422
Other, non-family households	65	30	95	110	300	0	0	10	0	10
Total need by income	2,748	1,833	2,155	693	7,429	756	1,455	2,029	1,043	5,283

Table 10 – Crowding Information – 1/2

Data Source: 2016-2020 CHAS

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
Households with Children Present	21,290	20,232	20,576	86,414	12,075	19,995	33,678	211,314

Data Source: ACS 2017-2021 5-Year Estimates PUMS

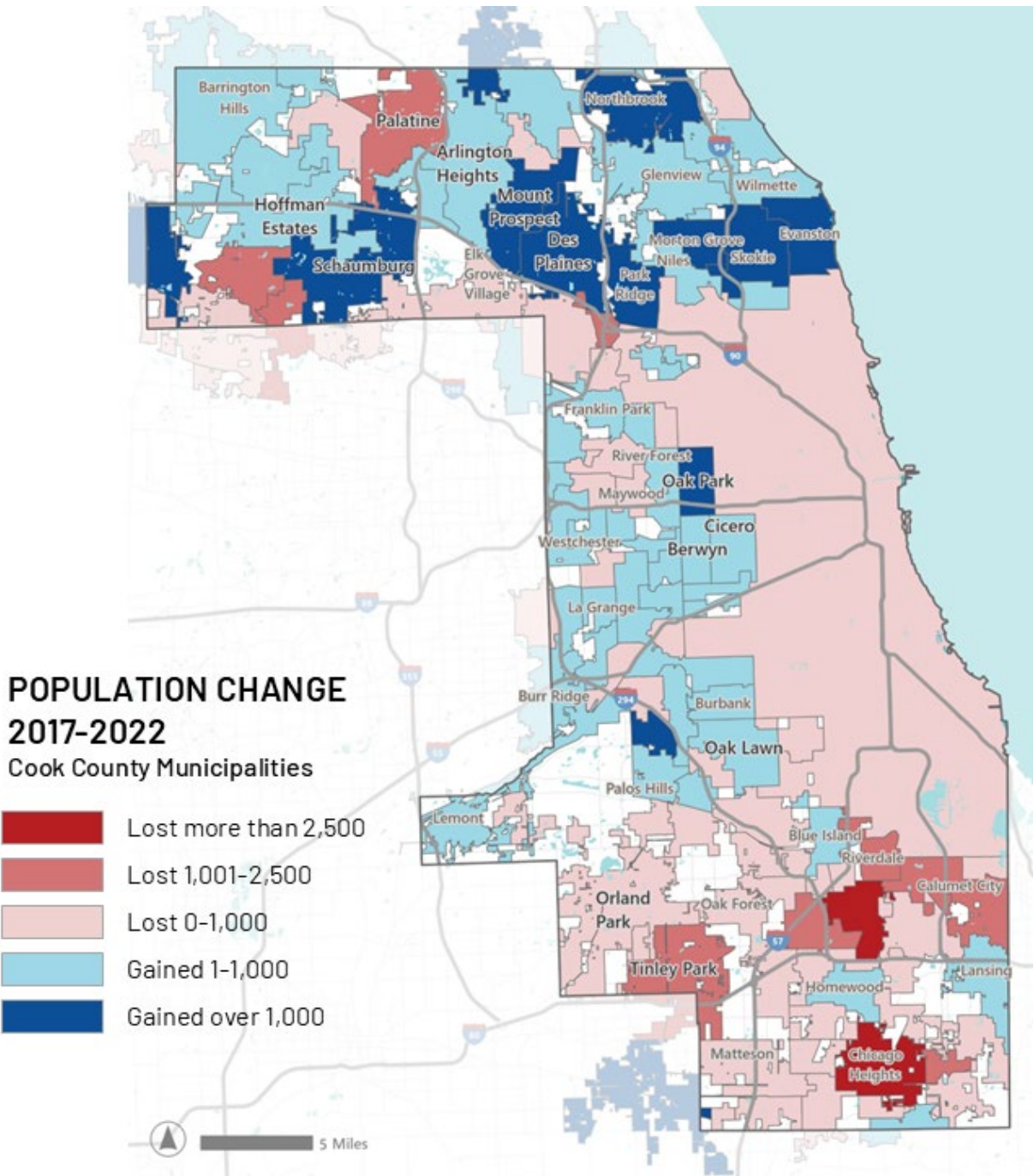
Table 11 – Crowding Information – 2/2

Data Source: ACS 2017-2021 5-Year Estimates PUMS

Summary

Suburban Cook County contains approximately 936,000 households as of 2022, with more than 26,000 households added over the preceding five years (ACS 5-Year 2018-2022). During the same period, however, population declined as households have trended smaller. The increase in households and reductions in household size have added to the strains on housing stock and affordability. Population change has not occurred consistently across Suburban Cook County: municipalities with population growth are primarily located in the north and west, while those with population loss are more likely to be in the south. Suburban Cook County has a high concentration of homeowners, who account for 72% of all households. Between 2017 and 2022, the number of homeowner households increased by nearly 28,000, while there was a decrease of about 1,300 renter households.

Construction of new housing units has slowed continually since 2018. The consequent strains on housing supply have contributed to significant increases in home prices and rents. Single-family home prices are 75% higher in 2024 than in 2015, and market-rate multifamily rents increased by 34% over the same period (MLS, CoStar). Nearly one third of all households were housing cost-burdened in 2022, with even higher rates of housing cost burden among renters (45%) and households earning less than \$50,000 (78%) (ACS 5-Year 2018-2022).



Source: ACS 5-Year Estimates (2013-2017, 2018-2022)

Describe the number and type of single-person households in need of housing assistance.

As of 2022 there are more than 262,000 single-person households in Suburban Cook County, or approximately 28% of total households (ACS 5-Year 2018-2022). Single-person households have increased by 3% since 2017, aligning with overall trends toward smaller households. Single-person households tend to be elderly, with 45% of such householders ages 65 and over. The number of single-person householders ages 65 to 74 grew by 19% from 2017 to 2022. Elderly residents often live on fixed incomes, making them especially vulnerable to housing cost increases.

Estimate the number and type of families in need of housing assistance who are disabled or victims of domestic violence, dating violence, sexual assault and stalking.

More than 250,000 residents of Suburban Cook County, or just over 10% of the population, have a disability (ACS 5-Year 2018-2022). In an interview, The Chicago Lighthouse — an organization that receives CDBG funding from the County — indicated that at least 25% of Chicago area residents experiencing homelessness have a disability. Those with disabilities typically have higher medical costs, greater likelihood of facing housing and workplace discrimination, and difficulty finding accessible units, all of which challenge their ability to find and maintain affordable housing.

WINGS, a local nonprofit working exclusively with victims of domestic violence, stated that it assisted more than 1,200 clients and provided more than 107,000 nights of shelter in its facilities in 2024. Services include counseling, safety planning, advocacy, and providing emergency shelter, housing, and transportation. WINGS noted the need for housing and supportive services for victims of domestic violence has increased in recent years. Clients requesting assistance also tend to arrive with few to no resources of their own, like clothing or money, and require a greater level of support in recent years. Between 2023 and 2024, WINGS utilized CDBG funding to provide 61 extremely low-income individuals fleeing domestic violence with more than 2,700 nights of shelter.

What are the most common housing problems?

Housing affordability is a widespread issue across Suburban Cook County for both homeowners and renters. As of 2022, 27% of homeowners and 45% of renters were housing cost-burdened (ACS 5-Year 2018-2022), meaning they pay more than 30% of their income on housing costs. Cost-burdened households are more likely to be lower-income, single-person and/or elderly households. Rapidly increasing single-family home prices, up by 75% since 2015, have also resulted in increased property tax burden for homeowners, impacting affordability even for those with fixed rate mortgages.

Changes in the interest rate environment for homebuyers in recent years have also impacted affordability. Many homeowners who purchased or refinanced homes at low interest rates in prior years appear hesitant to purchase a new home at a much higher interest rate today — in many cases twice the rate as mortgages taken out in lower interest rate environments. As a result, there were only 65% as many sales in 2024 as in 2021. Stagnation in the housing market increases competition and price for available units. Interviews and focus group participants suggest this stagnation may be driving an increase in housing overcrowding, as residents double-up or stay in unsuitable housing for longer periods of time.

Are any populations/household types more affected than others by these problems?

While 32% of households in Suburban Cook County experience housing cost burden, renters experience it at a much higher rate. The share of renters experiencing housing cost burden (45%) is significantly higher than that of homeowners (27%) in Suburban Cook County (ACS 5-Year 2018-2022). Housing cost burden is felt more severely for lower-income households: 93% of households in Suburban Cook County earning less than \$20,000 per year experience cost burden, compared to just 9% earning \$75,000 or more (ACS 5-Year 2018-2022).

Describe the characteristics and needs of Low-income individuals and families with children (especially extremely low-income) who are currently housed but are at imminent risk of either residing in shelters or becoming unsheltered 91.205(c)/91.305(c)). Also discuss the needs of formerly homeless families and individuals who are receiving rapid re-housing assistance and are nearing the termination of that assistance

Limited income is the greatest single characteristic of households currently housed but at imminent risk of housing instability. The shortfall of naturally occurring and subsidized affordable housing units forces many extremely low-income households to pursue market rate housing options. The highly competitive housing market results in many paying more than they can afford for housing, or facing homelessness. Job loss, childcare disruption, eldercare responsibilities, or other economic hardships can result in an inability to pay market-rate housing costs for households without access to savings or other resources.

The Alliance manages the Coordinated Entry system in Suburban Cook County, including the Suburban Cook County Call Center. Call center representatives identify households who are currently housed but at imminent risk of homelessness, meaning they expect to experience homelessness in the next 14 days. At-risk households are then referred to appropriate agencies who specialize in homelessness prevention. Agencies leverage state and local funding, alongside ESG funding, to provide short-term financial assistance to address immediate needs like making up late rent or utilities. Through the intake process, agencies also work to identify long-term solutions such as job placement and job training programs, and connect eligible households with available benefit programs.

The transition period for individuals who are receiving rapid re-housing assistance but nearing the end of such assistance requires robust coordination among service providers. Nonprofits assist program participants with benefits enrollment and job placements while they are receiving rapid re-housing assistance. Despite these efforts, interviews indicated that individuals living in rapid rehousing often struggle to identify stable housing once their housing support expires.

If a jurisdiction provides estimates of the at-risk population(s), it should also include a description of the operational definition of the at-risk group and the methodology used to generate the estimates:

The Alliance uses ESG guidelines to define those considered at risk of homelessness. This includes both emergency and imminent-risk populations. Those who are in an emergency situation self-identify as

anticipating losing shelter within 24-48 hours. Those at imminent risk anticipate losing shelter within 14 days. Annual estimates of residents at risk of homelessness are reported by the Alliance based on intake assessments from coordinated agencies and the “211” hotline which covers all of Cook County. Intake assessments include detail documenting characteristics correlated with a higher risk for homelessness, including those with disabilities, returning residents, elderly, and those living with mental illness, HIV/AIDS or substance abuse disorders.

Specify particular housing characteristics that have been linked with instability and an increased risk of homelessness

Households that are highly cost-burdened are more likely to experience housing insecurity or homelessness. Households with lower incomes are also more likely to be cost-burdened due to the lack of housing affordable to lower-income households in Suburban Cook County. Other populations at increased risk of homelessness include residents returning from periods of incarceration, those living with substance abuse disorders, those with behavioral health challenges, and those living with HIV/AIDS. Returning residents often face stigma from prospective employers and housing providers, further complicating housing and economic security. Those living with substance abuse disorders, behavioral health challenges, and HIV/AIDS may also face stigmas from employers and housing providers.

Discussion

Data and narratives in this section are focused on Suburban Cook County, with the exception of median household income in the “Summary of Housing Needs” table, which reflects all of Cook County, as data for Suburban Cook County alone was not available. Nuances in housing demographics, trends, and needs at the sub-regional, municipal, neighborhood, and block levels cannot be captured here given space limitations. HOME Consortium municipal members may have identified additional or refined needs in their individual Consolidated Plans, as appended here, that will help to further inform Cook County housing policies and programs. DPD will continue to coordinate with these HOME Consortium members to ensure that the deployment of HOME funds is consistent with both the County's and the municipalities' Consolidated Plans, particularly as it relates to housing goals, priorities, and strategies.

NA-15 Disproportionately Greater Need: Housing Problems – 91.205 (b)(2)

Introduction

Lower-income households are far more likely to experience at least one of the four indicated housing problems (lacking complete kitchen facilities, lacking complete plumbing facilities, crowding of more than 1 person per room, or cost burden greater than 30%). Limited disposable income prevents households from making essential repairs such as improving kitchen or plumbing facilities. Limited income can also make larger units cost-prohibitive and lead to higher rates of overcrowding. These issues impact renters and homeowners differently. Homeowners may have the freedom to address quality of life improvements

to housing but lack resources to do so. Renters are subject to landlord or property owner capacity and interest in addressing housing condition.

0%-30% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	68,567	7,337	10,480
White	32,609	3,766	4,023
Black / African American	22,411	2,483	5,075
Asian	2,326	135	318
American Indian, Alaska Native	218	10	0
Pacific Islander	0	0	0
Hispanic	10,206	865	851

Table 12 - Disproportionally Greater Need 0 - 30% AMI

Data Source: 2016-2020 CHAS

*The four housing problems are: 1) Lacks complete kitchen facilities, 2) Lacks complete plumbing facilities, 3) More than one person per room, 4) Cost Burden greater than 30%

30%-50% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	59,687	17,941	0
White	31,341	11,574	0
Black / African American	15,718	3,056	0
Asian	2,087	429	0
American Indian, Alaska Native	40	25	0
Pacific Islander	0	0	0
Hispanic	9,990	2,651	0

Table 13 - Disproportionally Greater Need 30 - 50% AMI

Data Source: 2016-2020 CHAS

*The four housing problems are: 1) Lacks complete kitchen facilities, 2) Lacks complete plumbing facilities, 3) More than one person per room, 4) Cost Burden greater than 30%

50%-80% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	51,507	55,402	0
White	27,096	30,555	0
Black / African American	11,935	13,039	0
Asian	2,519	1,815	0
American Indian, Alaska Native	65	114	0
Pacific Islander	20	0	0
Hispanic	9,315	9,256	0

Table 14 - Disproportionally Greater Need 50 - 80% AMI

Data Source: 2016-2020 CHAS

*The four housing problems are: 1) Lacks complete kitchen facilities, 2) Lacks complete plumbing facilities, 3) More than one person per room, 4) Cost Burden greater than 30%

80%-100% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	18,323	46,584	0
White	10,857	27,533	0
Black / African American	3,587	9,803	0
Asian	1,055	1,699	0
American Indian, Alaska Native	30	60	0
Pacific Islander	0	14	0
Hispanic	2,620	7,141	0

Table 15 - Disproportionally Greater Need 80 - 100% AMI

Data Source: 2016-2020 CHAS

*The four housing problems are: 1) Lacks complete kitchen facilities, 2) Lacks complete plumbing facilities, 3) More than one person per room, 4) Cost Burden greater than 30%

Discussion

A comparison of the share of households experiencing these four housing problems by race and ethnicity to the overall racial and ethnic makeup of Suburban Cook County householders identifies racial and ethnic groups more likely to experience at least one of the identified housing problems (2016-2020 CHAS data). Particularly for households earning 30-50% AMI, Black and Asian households are more likely to experience one of the four housing problems than other demographics within the income band. Hispanic households earning 30-80% AMI are slightly more likely to experience one of the four housing problems. White and Pacific Islander households earning less than 100% of AMI report housing problems less frequently than households at the same income level across the jurisdiction as a whole.

NA-20 Disproportionately Greater Need: Severe Housing Problems – 91.205

(b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

Introduction

Lower-income households are more likely to experience at least one of the four severe housing problems (lacking complete kitchen facilities, lacking complete plumbing facilities, crowding of more than 1.5 people per room, or cost burden greater than 50%). Trends for severe housing problems are similar to those described in the previous section on housing problems due to overlapping definitions. Lack of financial power limits households' ability to address housing condition issues (such as by improving kitchen or plumbing facilities) or relocate to housing that is more spacious or affordable (to resolve issues of crowding or extreme cost burden). Rates of renter and homeownership may impact likelihood of experiencing severe housing problems. Renters may have less power to improve the conditions of their unit due to reliance on a landlord to make repairs in comparison to those who own homes and may be able make improvements if they have disposable income to address them.

0%-30% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	60,242	15,650	10,480
White	27,811	8,536	4,023
Black / African American	20,311	4,598	5,075
Asian	2,171	293	318
American Indian, Alaska Native	169	65	0
Pacific Islander	0	0	0
Hispanic	9,063	2,017	851

Table 16 – Severe Housing Problems 0 - 30% AMI

Data Source: 2016-2020 CHAS

*The four severe housing problems are: 1) Lacks complete kitchen facilities, 2) Lacks complete plumbing facilities, 3) More than 1.5 persons per room, 4) Cost Burden over 50%

30%-50% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	30,123	47,551	0
White	15,328	27,574	0
Black / African American	8,238	10,534	0
Asian	1,199	1,306	0
American Indian, Alaska Native	0	65	0
Pacific Islander	0	0	0
Hispanic	5,207	7,458	0

Table 17 – Severe Housing Problems 30 - 50% AMI

Data Source: 2016-2020 CHAS

*The four severe housing problems are: 1) Lacks complete kitchen facilities, 2) Lacks complete plumbing facilities, 3) More than 1.5 persons per room, 4) Cost Burden over 50%

50%-80% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	16,078	90,754	0
White	8,727	48,884	0
Black / African American	2,576	22,345	0
Asian	1,028	3,343	0
American Indian, Alaska Native	0	179	0
Pacific Islander	0	20	0
Hispanic	3,544	15,039	0

Table 18 – Severe Housing Problems 50 - 80% AMI

Data Source: 2016-2020 CHAS

*The four severe housing problems are: 1) Lacks complete kitchen facilities, 2) Lacks complete plumbing facilities, 3) More than 1.5 persons per room, 4) Cost Burden over 50%

80%-100% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	4,819	60,051	0
White	2,481	35,892	0
Black / African American	612	12,787	0
Asian	389	2,343	0
American Indian, Alaska Native	0	90	0
Pacific Islander	0	14	0
Hispanic	1,258	8,516	0

Table 19 – Severe Housing Problems 80 - 100% AMI

Data Source: 2016-2020 CHAS

*The four severe housing problems are: 1) Lacks complete kitchen facilities, 2) Lacks complete plumbing facilities, 3) More than 1.5 persons per room, 4) Cost Burden over 50%

Discussion

A comparison of the share of households by race and ethnicity experiencing severe housing problems to the overall racial and ethnic makeup of Suburban Cook County households identifies racial and ethnic groups more likely to experience at least one of the identified severe housing problems (2016-2020 CHAS). Households earning less than 100% AMI more likely to report severe housing problems than the

households in the jurisdiction as a whole (33%) include Asian (39%), Black/African American (36%) and Hispanic households (36%). Otherwise, rates of experiencing severe housing problems across race and ethnicity were comparable or less than households in Suburban Cook County as a whole.

NA-25 Disproportionately Greater Need: Housing Cost Burdens – 91.205 (b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

Introduction:

Housing cost burden is the share of household income spent on housing costs, including rent or mortgage payments and utilities. HUD defines households as housing cost-burdened when they spend more than 30% of income on rent. Households that spend more than 50% of their income on housing costs and utilities are considered by HUD to be severely housing cost-burdened. The following table outlines housing cost burden by race and ethnicity for households that have no cost burden (<=30%), cost burden (30-50%) and severe cost burden (>50%).

Housing Cost Burden

Housing Cost Burden	<=30%	30-50%	>50%	No / negative income (not computed)
Jurisdiction as a whole	392,577	110,004	101,698	10,932
White	253,036	61,881	53,215	4,143
Black / African American	68,622	25,205	29,947	5,250
Asian	19,707	5,372	3,993	348
American Indian, Alaska Native	248	199	169	0
Pacific Islander	104	20	0	0
Hispanic	47,139	16,228	13,223	921

Table 20 – Greater Need: Housing Cost Burdens AMI

Data Source: 2016-2020 CHAS

Discussion:

On a percentage basis, American Indian, Alaska Native households have the highest rates of experiencing housing cost burden in Suburban Cook County (60%) (CHAS 2016-2020). Black (43%) and Hispanic (38%) households also experience housing cost burden at rates greater than the jurisdiction as a whole. White, Asian, and Pacific Islander households are less likely to be cost-burdened than Suburban Cook County as a whole, making up a smaller share of total cost-burdened households in comparison to the number of households led by each respective group.

NA-30 Disproportionately Greater Need: Discussion – 91.205(b)(2)

Are there any income categories in which a racial or ethnic group has disproportionately greater need than the needs of that income category as a whole?

Across Suburban Cook County, 59% of households earning less than 100% AMI report having one or more housing problems. Racial groups with higher rates of housing problems than the countywide average include Asian (64%), American Indian, Alaska Native (63%), Black/African American (62%) and Hispanic (61%) households. One disproportionately greater need is addressing housing problems for Black and Asian households earning 30-50% AMI; 84% and 83% of these households experience at least one housing problem, respectively. For households earning 30-50% AMI, 77% of households report at least one housing problem. Also notable is the rate of housing cost burden for Black, American Indian, Alaska Native, and Hispanic households relative to the County average overall.

If they have needs not identified above, what are those needs?

Some of the racial groups that experience housing problems or severe housing problems at higher rates are also geographically concentrated in certain neighborhoods and municipalities. These geographic concentrations of households experiencing housing problems at higher rates, especially in combination with a greater likelihood of being lower income, compounds housing challenges. These concentrations tend to be in South Suburban Cook County where several other factors challenge households' ability to respond to housing problems, including local governments with lower or declining tax bases, limited recent investments, limited transit connectivity, and fewer job opportunities.

Are any of those racial or ethnic groups located in specific areas or neighborhoods in your community?

Overall, some areas of Suburban Cook County are characterized by concentrations of racial and ethnic populations who are more likely to experience housing problems or have a greater share of lower-income households, such as South Suburban Cook County.

NA-35 Public Housing – 91.205(b)

Introduction

Four housing authorities operate in Cook County: HACC, OPHA, Cicero HA, and HAPF. The Project Team reached out to housing authorities multiple times to solicit data and input for the Con Plan. HACC and OPHA participated in interviews, and the Cicero HA provided written responses. HAPF did not respond to requests for input.

Data related to public housing units, vouchers, and residents was only provided by HACC and OPHA, and is outlined in the tables below. The OPHA did not provide data for the number of elderly program participants at admission or breakdown of residents by race/ethnicity. The Cicero HA indicated that they do not own any public housing units, but do administer housing vouchers. The Cicero HA provided written comments detailing the voucher program they administer, as well as priorities and needs. No data was provided by HAPF, however their website indicated they administer 156 public housing units. These units are accounted for in the total number of public housing units table, but no detailed breakdown of residents was available. Data for average income, length of stay, and household size came from the PIH Information Center (PIC) as provided in the IDIS platform.

HACC indicated that most public housing units have been converted to Rental Assistance Demonstration Program (RAD) project-based voucher units in recent years; HACC has nearly 2,000 RAD units. Where applicable, certain characteristics outlined in the tables are not tracked by HACC and are left blank in the table, including the number of families requesting accessibility features, number of program participants living with HIV/AIDS, number of participants who are victims of domestic violence, the number of accessible units and details on special purpose vouchers for residents with a disability. Additionally, HACC and OPHA indicated the terms “Certificate” and “Mod-rehab” are no longer utilized. Such units have generally been replaced by RAD units, which are represented within the project-based voucher sections of the following tables.

Totals in Use

Program Type									
	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project - based	Tenant - based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
# of units vouchers in use	NA	NA	461	14,595	1,477	11,996	579	189	198

Table 21 - Public Housing by Program Type

***includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition**

Data Source: PIC (PIH Information Center)

Characteristics of Residents

	Program Type							
	Certificate	Mod-Rehab	Public Housing	Vouchers				
				Total	Project - based	Tenant - based	Special Purpose Voucher	
							Veterans Affairs Supportive Housing	Family Unification Program
Average Annual Income	\$0	\$0	\$10,627	\$13,418	\$14,350	\$13,395	\$13,647	\$11,965
Average length of stay	0	0	7	8	0	8	0	5
Average Household size	0	0	1	2	1	2	1	4
# Homeless at admission	0	0	-	1,123	249	610	192	39
# of Elderly Program Participants (>62)	0	0	188	4,160	793	3,235	129	3
# of Disabled Families	0	0	10	5,378	705	4,542	113	18
# of Families requesting accessibility features	0	0	NA	NA	NA	NA	NA	NA
# of HIV/AIDS program participants	0	0	NA	NA	NA	NA	NA	NA
# of DV victims	0	0	NA	NA	NA	NA	NA	NA

Table 22 – Characteristics of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center) for average annual income, length of stay and household size. Housing authorities for all other rows

Race of Residents

Race	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project - based	Tenant - based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
White	0	0	102	1,995	471	1,524	99	61	-
Black/African American	0	0	69	10,150	841	9,309	147	103	-
Asian	0	0	-	75	44	28	-	3	-
American Indian/Alaska Native	0	0	-	56	11	40	4	1	-
Pacific Islander	0	0	-	17	3	13	-	1	-
Other	0	0	3	30	9	19	1	1	-
*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition									

Table 23 – Race of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)

Ethnicity of Residents

Ethnicity	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers			Special Purpose Voucher		
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
Hispanic	0	0	34	589	90	443	21	35	-
Not Hispanic	0	0	427	12,035	1,263	10,419	226	127	-
*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition									

Table 24 – Ethnicity of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)

Section 504 Needs Assessment: Describe the needs of public housing tenants and applicants on the waiting list for accessible units:

Households on public housing waiting lists face long wait times before placement, often waiting years before being placed in public housing. During this time, households may move or experience changing needs. Income requirements of prospective tenants for public housing complicate long wait periods, as households may be eligible at the time of application but ineligible by the time a unit becomes available. HACC staff mentioned fluctuating eligibility can complicate the placement process as staff seek to match available units to target tenants.

Some public housing residents face physical health challenges, mental health challenges, or substance abuse disorders. These residents are likely to need additional resources such as treatment, counseling, medication, or other special accommodations.

OPHA opened its waitlist in 2023 for the first time in several years and received more than 21,000 applications. In 2025, OPHA again opened the waitlist, receiving more than 18,000 applications to fill 150 spaces on the waitlist. Of these applications, 556 qualified for local preference with either the applicant or a family member living or working in Oak Park.

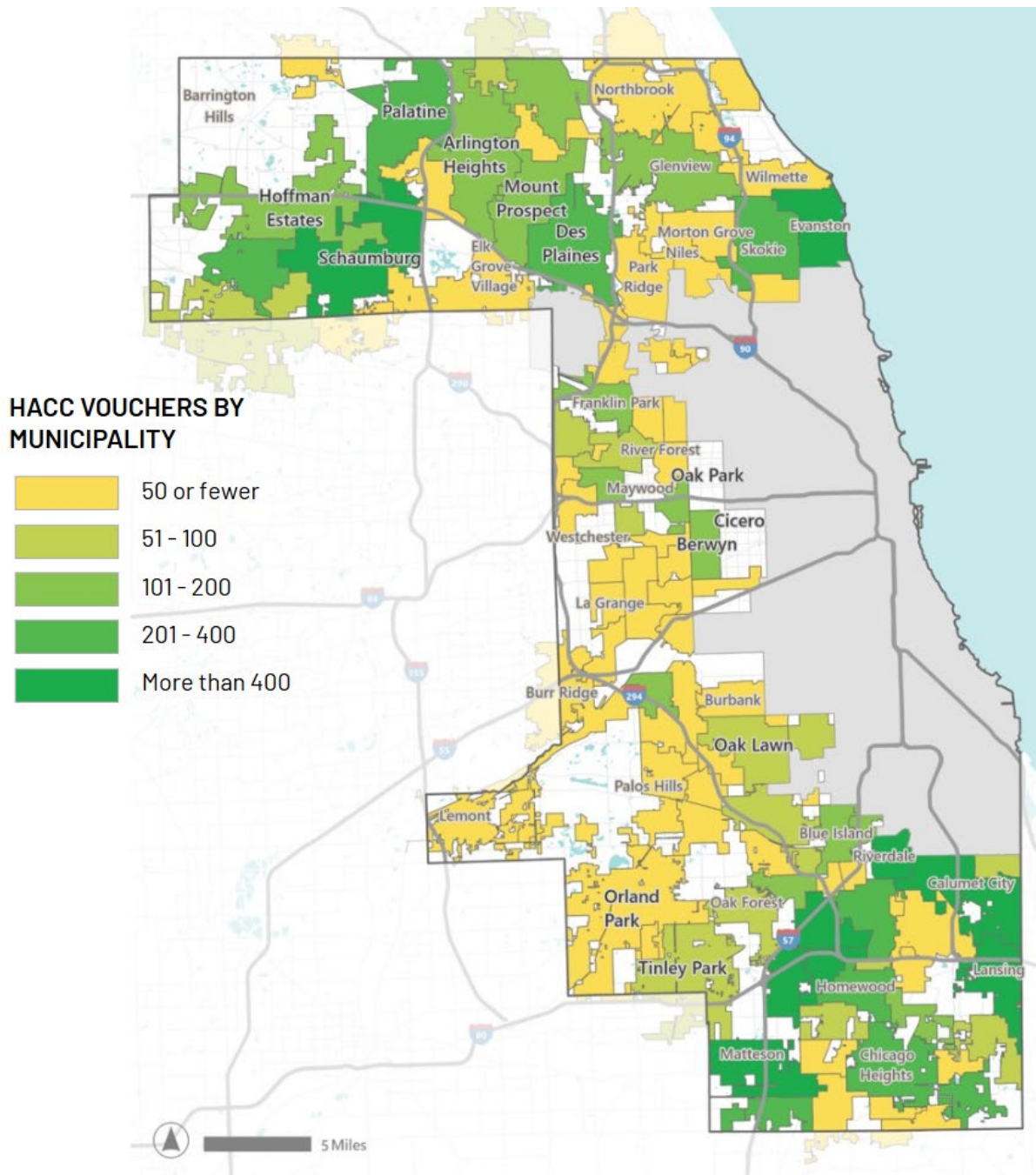
The Cicero HA indicated in a written response that there are currently 3 people on their waitlist for housing vouchers, and that they do not own any public housing developments. Currently, the Cicero HA is planning to reopen the housing voucher waitlist by August 2025 for extremely low-income households (\$21,200 annual income for a single person household).

Most immediate needs of residents of Public Housing and Housing Choice voucher holders

For public housing residents, maintenance of their housing units is a significant need. While maintenance staff are responsive to tenant requests, long-term wear and emergency needs may necessitate additional intervention and disrupt tenants. Though most public housing sites are being converted to RAD, remaining units have unmet rehabilitation and maintenance needs. Furthermore, HACC seeks to expand the inventory of accessible units for residents with disabilities, requiring more extensive improvements during the rehabilitation. HACC indicated there are some public housing unit vacancies due to needed rehabilitation. In addition, a recent fire in one property temporarily required the relocation of some impacted residents during the repairs. Though these events disrupt tenants' lives, rehabilitation and repairs are necessary to maintain quality living environments.

Voucher holders may face challenges in finding landlords willing to accept vouchers and the administrative burden associated with the program. Interviews indicated some landlords may be wary of the additional challenges residents face, such as mental illness and substance abuse disorders, and therefore be less inclined to accept vouchers. Voucher holders have reported more difficulty obtaining housing in the northern suburbs due to lack of landlords willing to accept voucher. While voucher holders may have more success finding landlords willing to accept vouchers in lower cost areas of Suburban Cook County, tenants who secure housing far from their initial community frequently struggle to maintain connections to supportive services and employment due to a sense of isolation.

The Cicero HA noted that senior housing, rehabilitation of existing housing to maintain or improve condition, and building new housing are priority needs in their community.



Source: HACC

How do these needs compare to the housing needs of the population at large

While certain needs of public housing residents are specific to their living situation, others are more generally applicable, including the accessibility and integration of supportive services. All residents who have special needs such as mental illness or substance abuse disorders would benefit from increased connectivity to supportive services. These services provide guidance and stability to manage conditions and create better outcomes for employment and housing. Transit proximity and accessibility challenges in South Cook County impact many residents in the area. Lack of connectivity to other parts of the county impacts access to employment, education, and supportive services. These challenges disadvantage current residents but also discourage additional residents from moving to the area.

Discussion

Most data in the preceding section was provided directly by HACC and OPHA, email communication with the Cicero HA, and data from the HAPF website. Resident characteristic data for average annual income, household size and length of stay is sourced from the autoloading PIC source. Racial and ethnic breakdown data was only available from HACC.

According to the data provided by the housing authorities, more than 5,300 housing vouchers are administered to those with disabilities, and more than 4,100 to recipients over age 62. More than 1,100 voucher recipients were homeless at the time they received their housing voucher. Racial and ethnic breakdowns provided by HACC indicated that approximately 82% of voucher recipients identified as Black or African American, 16% as White, 5% as Hispanic, and a relatively low share for any other identity.

NA-40 Homeless Needs Assessment – 91.205(c)

Introduction:

Continually increasing costs of housing have led to increases in the number of individuals and families experiencing or at risk of homelessness. Even those with employment and steady income are increasingly prone to homelessness as the cost of housing, childcare, elder care, and other necessities continue to increase. With less discretionary income and high instances of housing cost burden, many households are vulnerable to a temporary emergency threatening their housing stability. A short-term emergency cost, such as needed car repairs or emergency medical costs, may cause a household to fall behind on rent or utilities; these issues can quickly snowball, resulting in homelessness. Nonprofit organizations working to secure housing and employment for those experiencing homelessness reported that, even for those households with secure employment and stable income, increasing housing costs and market competition have added extraordinary pressure, leading some households to housing instability and even homelessness. The figures noted in the Homeless Needs Assessment table below are likely far less than actual rates of homelessness in Suburban Cook County due to the difficult nature of quantifying individuals experiencing homelessness.

Homeless Needs Assessment Table

Population	Estimate the # of persons experiencing homelessness on a given night		Estimate the # experiencing homelessness each year	Estimate the # becoming homeless each year	Estimate the # exiting homelessness each year	Estimate the # of days persons experience homelessness
	Sheltered	Unsheltered				
Persons in Households with Adult(s) and Child(ren)	420	2	1,753	1,262	737	113
Persons in Households with Only Children	2	0	70	36	35	21
Persons in Households with Only Adults	366	112	3,575	1,103	595	113
Chronically Homeless Individuals (at entry)	122	47	543	NA	117	144
Chronically Homeless Families	NA	NA	NA	NA	NA	NA
Veterans	29	7	249	31	157	95
Unaccompanied Child	NA	NA	NA	NA	NA	NA
Persons with HIV	6	1	33	NA	9	NA

Data Source: 2024 Point In Time Count (via Alliance to End Homelessness)

If data is not available for the categories "number of persons becoming and exiting homelessness each year," and "number of days that persons experience homelessness," describe these categories for each homeless population type (including chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth):

Data is available for all groups except chronically homeless families and unaccompanied children, as noted in the table.

Data for unaccompanied children experiencing homelessness and chronically homeless families were not available. In total, more than 5,300 individuals were expected to experience homelessness in the last year, according to data provided by the Alliance. The true number could be much higher. Unaccompanied children often avoid unsheltered homelessness by couch surfing or living in their vehicle, and therefore do not appear in homelessness counts. Tracking the number of homeless families with children can also be challenging. Data provided by the McKinney-Vento Regional Homelessness Liaison indicated that nearly 2,500 students are likely to experience housing insecurity in 2025 across the 39 school districts in North Cook County alone. Housing insecurity is defined here as students not having “a fixed, regular, and adequate place to sleep at night.” Data from the prior year indicated that in 2024, 2,700 students experienced housing insecurity in North Cook County, with nearly 7,100 students across all of Suburban Cook County (Suburban Cook County data from Illinois State Board of Education).

Veterans are often eligible for Veterans Affairs Supportive Housing (VASH) vouchers, the largest permanent voucher program administered by HACC. The VASH waitlist is administered by the Department of Veterans Affairs; therefore, the number of individuals on the waitlist was not available. There is a strong demand for housing and services tailored to veterans. Per the 2024 PIT, 250 of those experiencing homelessness were estimated to be veterans.

Additional data provided by the Alliance indicated that the average number of days for those experiencing homelessness varied from as low as 21 days for households with children to 144 days for chronically homeless individuals. More than 2,400 individuals are estimated to have entered homelessness in 2024, with less than 1,400 exiting homelessness to permanent housing.

Nature and Extent of Homelessness: (Optional)

Race:	Sheltered	Unsheltered
White	177	39
Black/African American	627	45
Asian	8	0
American Indian, Alaska Native	7	0
Pacific Islander	2	2
Other	38	1
Ethnicity	Sheltered	Unsheltered
Hispanic	215	27
Not Hispanic	859	87

Data Source: 2024 Point In Time Count (via Alliance to End Homelessness)

Estimate the number and type of families in need of housing assistance for families with children and the families of veterans.

Approximately 36 veterans were counted during the 2024 Point-in-Time Count (PIT), with an estimated 249 experiencing homelessness during 2024. Veterans experienced homelessness for an average of 95 days, or just over 3 months.

About 422 households with both adults and children were counted during the 2024 PIT, with more than 1,700 estimated to have experienced homelessness in 2024. There are likely a significant number of homeless families and children not reflected in the PIT data. Data provided by the McKinney-Vento Regional Homelessness Liaison indicated that across the 39 school districts in North Cook County alone, nearly 2,500 students are experiencing housing insecurity, and more than 7,100 students experienced housing insecurity in 2024 across the entire county. These may be families living in cars, temporarily staying with family or friends, or other non-permanent housing situations.

Describe the Nature and Extent of Homelessness by Racial and Ethnic Group.

Over half (57%) of those experiencing homelessness during the 2024 PIT identified as Black or African American. About 20% identified as Hispanic, and 18% identified as White. Black or African American residents were a majority of both sheltered and unsheltered groups. Asian, Pacific Islander and other racial and ethnic groups accounted for less than 5% of those experiencing homelessness during the PIT.

Describe the Nature and Extent of Unsheltered and Sheltered Homelessness.

In total, nearly 1,200 persons were homeless at the 2024 PIT, with about 90% living in shelters and 10% unsheltered. Unsheltered homeless counts typically reflect individuals found to be living in groups or

known camps at the time of the count, and do not account for the significant number of individuals or families who were not located at the time of the PIT.

Discussion:

The true number of individuals experiencing homelessness throughout the year is likely significantly higher than reported, as the PIT is likely to miss individuals living in cars, sleeping on couches, or in other non-permanent and transitory living situations. Additionally, the PIT is conducted in January, when some individuals may be able to find short-term places to stay during bitter cold nights, but experience sheltered or unsheltered homelessness during much of the rest of the year.

If the PJ will establish a preference for a HOME TBRA activity for persons with a specific category of disabilities (e.g., persons with HIV/AIDS or chronic mental illness), describe their unmet need for housing and services needed to narrow the gap in benefits and services received by such persons. (See 24 CFR 92.209(c)(2) (ii))

Cook County does not utilize HOME funds for tenant-based rental assistance.

NA-45 Non-Homeless Special Needs Assessment - 91.205 (b,d)

Introduction:

Special needs groups within Suburban Cook County include elderly, frail elderly, public housing residents, persons with mental, physical, and/or developmental disabilities, persons with alcohol or other drug addiction, persons with HIV/AIDS and their families, and victims of domestic violence, dating violence, sexual assault, or stalking. Affordable housing is a core need across all special need groups, many of whom are lower-income, experience health challenges, and may be at an increased risk of homelessness. A core component of homelessness services in Suburban Cook County is prevention, to ensure that housing services are provided to households at risk of becoming homeless prior to an event.

Describe the characteristics of special needs populations in your community:

Special needs populations are more likely to be low-income, face compounding health challenges, and be at risk of homelessness than other residents. Elderly households make up a large share of total households who are housing cost-burdened. Approximately 39% of households who pay more than 30% of their income on housing and 56% of households who pay over 50% of their income on housing are elderly. Many residents of public housing are also elderly, as senior housing developments have been retained while other public housing has been converted to RAD. In Oak Park, the only public housing development owned by the OPHA is restricted to seniors. Applicants for housing vouchers are likely to be single-income households, if they have any income at all. Nearly 80% of the OPHA's more than 18,000 housing voucher waitlist applicants were female, with the majority of those applying for units with more than one bedroom being single mothers.

WINGS and the AIDS Foundation of Chicago also described most of their client base as low-income during interviews. WINGS noted that many survivors of domestic violence experience compounding health challenges, including some severe health conditions such as traumatic brain injuries. According to the AIDS Foundation, residents living with HIV/AIDS often experience intersecting physical and behavioral health challenges, and are more likely to experience stigma from employers and housing providers based on their health status. The Chicago Lighthouse estimates that 60% of their clients are uninsured or under-insured. Homelessness service providers also indicated the compounding challenges of physical and behavioral health conditions, disability, addiction, and experience of domestic violence, which can increase the risk of experiencing homelessness.

What are the housing and supportive service needs of these populations and how are these needs determined?

The availability of naturally occurring or income-restricted affordable housing is essential to meet the housing needs of many special needs populations in Suburban Cook County. Increasing property taxes and maintenance costs are particularly challenging for low-income, elderly homeowners. Elderly residents are also more likely to have disabilities, which can increase housing costs through expensive but necessary accessibility improvements.

Nonprofits representing target special needs populations consistently reiterated during interviews that there is simply not enough funding to provide the number of income-restricted affordable housing units to the populations in need. In particular, residents with intersecting behavioral and physical health challenges often require on-site services or accessible housing units, both of which drive up the cost of constructing new units. To meet the needs of special needs populations, many nonprofits work to address the root causes of housing instability. Nonprofits often work to provide referrals to legal support, assistance with voucher compliance requirements, and provide referrals to other medical, housing, and workforce service providers.

Examples of organizations consulted that provide services to special needs populations include the AIDS Foundation of Chicago, WINGS, and The Chicago Lighthouse. Special needs populations are also at increased risk of experiencing homelessness. Therefore, organizations such as the Alliance to End Homelessness, The Harbour, and Housing Forward were also consulted. These organizations identify client needs primarily through one-on-one assessments with residents who reach out directly for assistance, or are referred through the coordinated entry system, healthcare partners, and other service providers.

Discuss the size and characteristics of the population with HIV/AIDS and their families within the Eligible Metropolitan Statistical Area:

The AIDS Foundation of Chicago estimates that there are 6,776 people living with HIV/AIDS in Suburban Cook County. Certain populations are disproportionately impacted by the HIV epidemic, both nationally and within Suburban Cook County. These populations include Black and Latine gay, bisexual, same gender loving, and other men who have sex with men (MSM), young Black and Latine MSM under the age of 25, people over the age of 50, cisgender Black women, and transgender women of color.

Residents living with HIV/AIDS face particular challenges with accessing housing, employment, and healthcare. Those living with HIV/AIDS may be more likely to be low-income and/or experience homelessness due to additional healthcare needs and the stigma from employers and housing providers. Across Illinois, the Centers for Disease Control and Prevention estimates that 11% of adults living with HIV/AIDS lived in unstable housing situations in 2021. The availability of stable housing has a strong correlation with positive health outcomes, particularly for those living with HIV/AIDS. The AIDS Foundation of Chicago estimates that HIV is 8-16 times less likely to be transmittable for those in stable housing situations who are more effectively able to manage their viral load. Reflecting the intersecting behavioral and mental health challenges many people living with HIV/AIDS may experience, an estimated 22% of adults with HIV/AIDS across Illinois have an unmet need for mental health services.

If the PJ will establish a preference for a HOME TBRA activity for persons with a specific category of disabilities (e.g., persons with HIV/AIDS or chronic mental illness), describe their unmet need for housing and services needed to narrow the gap in benefits and services received by such persons. (See 24 CFR 92.209(c)(2) (ii))

Cook County does not utilize HOME funds for tenant-based rental assistance.

Discussion:

Special needs populations face compounding housing and health challenges that drive the need for specific housing and supportive service interventions. Priority needs include housing at the deepest levels of affordability, permanent supportive housing (PSH) with on-site services, and a system of comprehensive referral to other service providers. Developers of PSH and housing providers noted the increasing capital and operational costs of PSH, challenges at the local level advancing zoning and entitlements, and limited sources of subsidy, particularly to offset high operational costs. Geographic disparities in housing, health services, and transit access also impact special needs populations. Communities in South Suburban Cook County may have more low-cost housing, but access to health services, transit, and jobs is often limited. These communities also experience higher rates of poverty and lower quality of existing housing. Conversely, voucher discrimination can limit opportunities for special needs populations to access housing in north suburban communities with better access to health services, jobs, and transit.

NA-50 Non-Housing Community Development Needs – 91.215 (f)

Describe the jurisdiction’s need for Public Facilities:

DPD provides funding for public facilities operated by nonprofit organizations and units of local government. Supported facilities include senior centers, disabled centers, homeless facilities, community centers, recreational facilities, facilities for persons with special needs, and other social service agencies. Geographic disparities exist, with limited access to existing services and facilities across many south and west suburban communities. Access to facilities is further challenged in areas with a declining population,

as the tax base available to support construction and operations may be diminished. There is also a need for accessibility improvements at existing facilities which can support special needs populations. Warming and cooling facilities during extreme weather events are also needed, particularly in areas that experience high urban heat impacts such as the west and south suburbs.

How were these needs determined?

Specific needs for public facilities were determined through stakeholder interviews, focus groups, data analysis, plan review, and discussions with County staff.

Describe the jurisdiction's need for Public Improvements:

DPD provides funding for public improvements or infrastructure including water/sewer, roads, streetscape improvements, green infrastructure, and parks. Much of the county's infrastructure has aged significantly and needs maintenance or replacement. As many public improvements span multiple communities and units of government, collaboration is critical to advance projects. For example, DoTH is responsible for only 5% of the county's roadways and is one of 205 transportation agencies in the county. Funding coordination is necessary given the typical scope, size, and complexity of such projects.

Transportation investments support the county's workforce, businesses, and residents. Transportation needs highlighted by DoTH include more multimodal options, improved speed and reliability of bus service, trucking improvements, rail investments, and improved interagency collaboration. Supporting areas of disinvestment and addressing gaps in transportation access across the south and west suburbs is also a priority to increase access to jobs, amenities, and economic opportunity. Infrastructure dedicated to bike and pedestrian movement is limited or unavailable in the south and west suburbs, with a lack of bike lanes, sidewalks, and safe road crossings. Bicyclists and pedestrians in those areas may be discouraged from riding or walking or be forced onto streets that are not designed to ensure their safety.

DPD also continues to consult with MWRD — the County's designated stormwater management authority — regarding infrastructure improvements that might mitigate or prevent flooding. Nearly the entire county has some level of flood risk, with most of the county ranked at least 8 out of 10 on CMAP's urban flood susceptibility index (defined as "extremely susceptible" to flooding). The County's 2024 environmental justice survey — completed by 1,158 residents — indicated that flooding was the top concern out of all environmental issues. Green infrastructure improvements are a priority and can help mitigate flooding impacts. Municipal interest in green infrastructure projects like green alleys and permeable parking lots has increased significantly in recent years. Other flooding-related infrastructure needs include watershed stabilization and acquisition of flood-prone properties.

Lead pipe hazard mitigation is also a priority need. Cook County has one of the highest counts of lead service lines (LSLs) in the country, which leach into water and pose a particular threat to children's development. The cost to replace all LSLs in Cook County is estimated to be \$8 billion, with need vastly outstripping resources.

How were these needs determined?

Specific needs for public improvements and infrastructure were determined through stakeholder interviews, focus groups, data analysis, plan review, and discussions with County staff. Additionally, significant stakeholder engagement was conducted during the development of DoTH's most recent strategic plan (2016) and the development of the County's Environmental Justice Policy in summer 2024. The Environmental Justice Policy survey received 1,158 responses and was available in English, Spanish, Polish, Cantonese, Mandarin, Tagalog, and Arabic.

Describe the jurisdiction's need for Public Services:

There is a broad need for services that support positive housing and health outcomes and workforce participation. Housing services include referrals and case management related to shelter placement, transition housing, and rapid rehousing. Administrative support can also help families navigate requirements related to tenant-based vouchers and other program-specific requirements. Referrals to free legal assistance are also critical to address challenges related to housing discrimination and eviction. Additionally, there is a significant need for more permanent supportive housing with on-site services, and a system of comprehensive referral to other service providers. On-site supportive service needs can include physical and behavioral health services as well as assistance with basic functions such as eating and using the bathroom.

One of the top health service needs is access to behavioral health services, especially consistent, lower-touch services like counseling and outpatient services that don't require placement in assisted care facilities. Nonprofit and social service agencies that provide services to homeless and special needs populations highlighted that the need for behavioral health services far exceeds the services available. Other health needs include expanded food access for low-income residents and/or those experiencing homelessness, substance use treatment, and case management assistance navigating disability enrollment, social security, and insurance systems.

Services that support workforce participation encompass counseling and case management as well as flexible funds to reduce barriers to employment. One-on-one support needs include assistance enrolling in benefits, managing disability enrollment, and soft skills coaching (e.g., how to dress for an interview). Funds that assist in addressing barriers to employment include transportation stipends, childcare assistance, and funding for work clothes or other essentials like laptops. The flexibility of these funds is crucial so that service providers can respond to and best address individual client needs.

How were these needs determined?

Priority public services were identified based upon data compilation and analysis, as well as consultation through focus groups and interviews. Analysis included demographic characteristics of Suburban Cook County, review of historical DPD funding priorities, and assessment of service needs and gaps based on historical funding. Input regarding related needs was provided via focus groups, interviews, and written comment. In addition, significant stakeholder engagement was conducted during the development of the

2024-2027 Policy Roadmap for Cook County Offices Under the President. The Policy Roadmap highlights core health and social service needs for the county’s residents and communities.

Housing Market Analysis (MA)

MA-05 Overview

Housing Market Analysis Overview:

The Suburban Cook County housing market faces several challenges including an insufficient supply of affordable housing, particularly to accommodate a range of household sizes and residents with special needs, housing that is in need of rehabilitation, limited housing options for special needs groups including the disabled and residents experiencing homelessness, and regulatory barriers that limit the development and preservation of affordable housing. Many housing market indicators mirror the county's geographic and economic divides, including home values, homeownership rates, and the share of cost-burdened households. Areas of northern and southwestern Cook County on average report higher home values and rents, while the market is generally weaker across portions of the west and south.

Overall, Suburban Cook County has a competitive, constrained housing market, with limited recent construction and strong market demand driving escalating prices for both for-sale and rental homes. Lower-income households are particularly at risk of housing instability: nearly two-thirds of households with incomes below \$75,000 are housing cost-burdened, and the shortage of affordable housing is greatest for households earning less than 30% of area median income (AMI). Disparities in housing affordability and access include higher rates of housing cost burden and lower rates of homeownership for Black and Hispanic households (2018-2022 ACS 5-Year estimates). The number of unsheltered residents experiencing homelessness has also been increasing, demonstrating the need for additional temporary and permanent supportive housing (PSH) solutions for the county's most vulnerable residents (Alliance).

MA-10 Number of Housing Units – 91.210(a)&(b)(2)

Introduction

There are over 1 million housing units in Suburban Cook County. Approximately 66% of units are single-family homes, most of which are detached single-family homes. An additional 9% of units are in small 2-4-unit buildings, 13% are in buildings with 5-19 units, and 11% are in larger buildings with 20 or more units. Multifamily housing units in the area's traditional 2-4-flats are concentrated in the near west and near north suburbs, with larger multifamily buildings often located near transit stations and major interstates. Rental units tend to offer fewer bedrooms: 34% of renter-occupied units are studios or 1-bedrooms, compared to only 3% of owner-occupied units. Conversely, only 26% of rental units have 3 or more bedrooms compared to 75% of owner-occupied units (2018-2022 ACS 5-Year estimates). This leads to fewer homeownership opportunities for smaller households such as young professionals and aging residents looking to downsize, as well as fewer rental options for larger families with children. Lower-

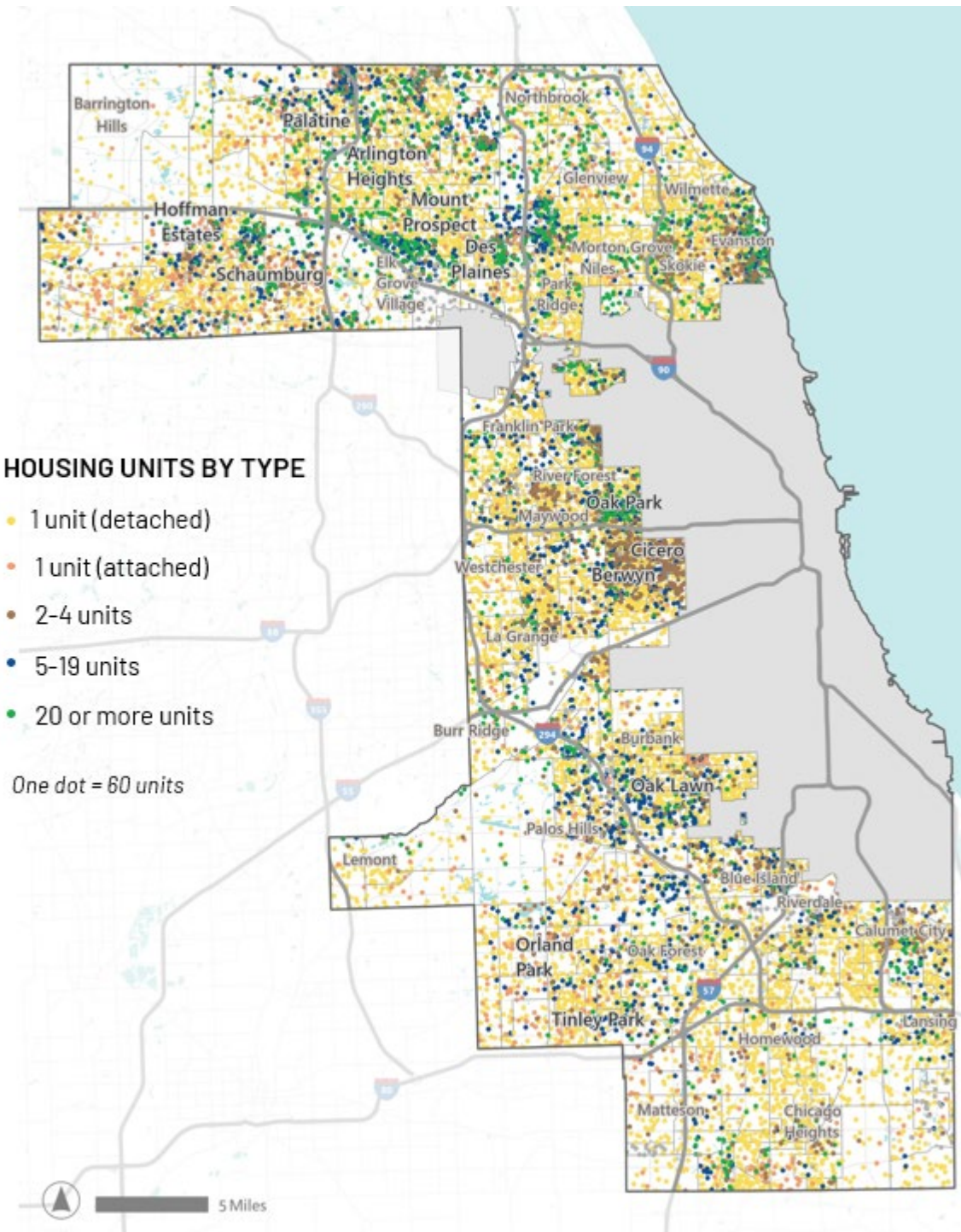
income renter households with children are more likely to be impacted; in addition to being limited in supply, rental units with three or more bedrooms are more expensive than smaller units.

All residential properties by number of units

Property Type	Number	%
1-unit, detached structure	580,599	58%
1-unit, attached structure	76,708	8%
2-4 units	91,048	9%
5-19 units	130,305	13%
20 or more units	109,249	11%
Mobile home, boat, RV, van, etc.	14,706	1%
Total	1,002,615	100%

Table 1 – Residential Properties by Unit Number

Data Source: ACS 5-Year Estimates (2018-2022)



Source: ACS 5-Year Estimates (2018-2022)

Unit Size by Tenure

	Owners		Renters	
	Number	%	Number	%
No bedroom	2,568	0%	13,111	5%
1 bedroom	20,476	3%	74,655	28%
2 bedrooms	143,736	21%	106,708	41%
3 or more bedrooms	506,930	75%	68,156	26%
Total	673,710	100%	262,630	100%

Table 2 – Unit Size by Tenure

Data Source: ACS 5-Year Estimates (2018-2022)

Describe the number and targeting (income level/type of family served) of units assisted with federal, state, and local programs.

Collectively, the Housing Authority of Cook County (HACC), Oak Park Housing Authority (OPHA) and Housing Authority of Park Forest (HAPF) subsidize 15,056 units of housing. Of these units, 3% (461) are public housing units owned and managed by the housing authorities and 10% (1,477) operate with project-based voucher rental assistance. The remaining 87% encompasses Housing Choice Vouchers (HCVs) held by residents, including allocations of Special Purpose Vouchers (SPVs) for target populations. SPVs include 579 for Veterans Affairs Supportive Housing, 189 for the Family Unification Program, 198 for residents with disabilities, and 15 for youth exiting the foster care system. HCVs and subsidized units managed by the housing authorities are generally only available to households at the lowest incomes. Overall, public housing residents and voucher holders in Suburban Cook County have average incomes well below 30% AMI, which ranges from \$21,900 for a single-person household to \$33,780 for a household of five. The average annual income of public housing residents is \$10,627, while the average annual income of voucher holders ranges from \$13,400-\$14,400 (PIH Information Center).

These 15,056 units of subsidized housing represent only a small share (1.5%) of the 1.0 million housing units in Suburban Cook County. Demand for affordable units far outstrips available supply. For example, when OPHA recently opened their waitlist for HCVs, over 18,000 households applied for just 150 waitlist spots. While public housing is a core component of the affordable housing supply, the limited number of subsidized units highlights both the scale of the affordable housing shortage in Suburban Cook County and the need for additional methods to address housing affordability.

Provide an assessment of units expected to be lost from the affordable housing inventory for any reason, such as expiration of Section 8 contracts.

Per discussions with the HACC, no units are anticipated to be lost from the expiration of project-based Section 8 contracts within the next five years. However, other factors may result in the loss of affordable units in Suburban Cook County. The rising cost of housing has resulted in fewer units of naturally occurring affordable housing available to lower-income households. Increasing demand and limited new construction, particularly in areas of economic opportunity, have led to rent increases and a highly

competitive housing market. This presents challenges for households with HCVs who rent units in the private market. Additionally, cost increases have exacerbated the challenges of acquiring and preserving additional housing developments for income-restricted housing.

Does the availability of housing units meet the needs of the population?

There is a mismatch between affordably priced owner- and renter-occupied homes in Suburban Cook County and the number of households to whom those units are affordable, particularly for the lowest-income households. For owner-occupied households, there is a 27,000-unit mismatch between housing units affordable to households earning less than 30% AMI and the number of owner households at that income level, and there is a 19,000-unit mismatch at the 30-60% AMI level. For renter-occupied units, the greatest mismatch impacts households earning less than 30% AMI, with 44,000 fewer affordable rental units than renter households earning less than 30% AMI (2018-2022 ACS 5-Year estimates). A mismatch of rental units at the highest income levels (over 120% AMI) also puts downward pressure on units in the middle of the market. Households earning more than 120% AMI are renting units affordable to households with lower incomes, increasing the competition for housing units affordable at 60-120% AMI.

Increasing sale and rent prices also impact affordability. Between 2015 and 2024, the median single-family home sale price increased by an average of 75% or \$137,000 across Suburban Cook County, while average market-rate multifamily rents increased by 34% or \$430/month (MLS, CoStar). This exacerbates challenges for households at the lowest income levels, who are already more likely to be housing cost-burdened. Approximately 64% of Suburban Cook County households making under \$75,000 are housing cost-burdened, compared to only 9% of households making over \$75,000 (2018-2022 ACS 5-Year estimates).

Interviews with developers, service providers, and nonprofits pointed to significant need for permanent supportive housing, housing for seniors, and affordable units near transit. The County provides funding to support the construction of permanent supportive housing in tandem with other federal, state, local, and private funds. The need for these units continues to be great: developers, operators, and advocates engaged throughout the development of the draft Con Plan indicated that demand for permanent supportive housing far exceeds the supply. For seniors, age-restricted affordable senior housing is a core need along with smaller for-sale and rental homes near transit and amenities that provide options for residents to age in place in their communities. Affordable housing near transit is also a critical need for working residents to increase access to jobs and economic opportunity. Focus group participants and steering committee members also highlighted gaps in the supply of larger, affordable rental units suitable for families.

Finally, the age of housing stock presents challenges for lower-income, senior, and/or fixed-income owner households who are less likely to have the resources to perform critical upgrades. Housing often needs substantial rehabilitation and investments after 20-30 years to update major systems and structural components. Approximately 72% of housing units in Suburban Cook County are at least 45 years old, with significant concentrations across the inner-ring west suburbs and south suburbs (2018-2022 ACS 5-Year

estimates). Updating and maintaining the existing housing stock is critical to preserve existing naturally occurring affordable housing.

Describe the need for specific types of housing:

There is an extensive need for affordable rental and homeownership opportunities in Suburban Cook County, particularly for households earning less than 60% AMI. As noted, there are mismatches between the number of owner-occupied households and affordable units available at the <30% and 30-60% AMI levels. For renter-occupied housing, there is a mismatch at the <30% AMI level, with fewer affordable units than households (2018-2022 ACS 5-Year estimates). Focus group participants and steering committee members supported these findings, indicating that housing for households making under 60% AMI should be a top priority. They also highlighted the need for affordable housing for families, demonstrated by the current undersupply of affordable 2- and 3-bedroom rental units, affordable housing for seniors, and housing near jobs and economic centers. Affordable homeownership opportunities are critical, as they provide stable, secure housing as well as opportunities for wealth building. Rising home sale prices make affordable homeownership increasingly unattainable, with the median single-family home sale price rising by 75% or \$137,000 between 2015 and 2024 (MLS).

In addition to new affordable housing construction, preservation of existing affordable units is essential. Interviewees, focus group participants, and steering committee members highlighted the importance of housing preservation, especially given the high material and labor costs, increasing insurance costs, and high interest rates that currently make new construction challenging. Preservation is also a key need in lower-income areas of the county with high concentrations of older homes which may require rehabilitation to ensure that they remain decent, safe, and code-compliant.

More small, accessible permanent supportive housing units with on-site services are needed, as well as dedicated funding to support ongoing operations. Developers and advocates indicated that access to public transit is also important for permanent supportive housing residents, as many households do not have cars or drive. The growing senior population, which is more likely to have a disability, will continue to increase demand for accessibility updates to homes as they try to age in place. These costs can be challenging for older residents who are more likely to be on fixed incomes. The senior population also needs more affordable senior housing and assisted living options.

Discussion

There is a demonstrated need for affordable housing across the county that can meet the diverse needs of residents. This includes affordable rental options for families and seniors, affordable homeownership opportunities, housing affordable to the lowest-income households, and permanent supportive housing for special needs populations. While new units are needed, preservation of existing housing is also a key priority given the age of the county's housing stock. Rehabilitation challenges particularly impact low-income households who are less likely to have the resources for essential repairs. Advocacy, education, and policy changes are also important components of advancing affordable single-family and multifamily housing development. Stakeholders highlighted the need for coordinated advocacy around funding for

affordable and permanent supportive housing; zoning changes, local incentives, and capacity-building; education around housing discrimination; and access to legal resources.

MA-15 Housing Market Analysis: Cost of Housing - 91.210(a)

Introduction

Housing affordability is one of the most pressing challenges in Suburban Cook County. Sale prices and rents have been rising rapidly, placing pressures on low- and moderate-income households, seniors, first-time homebuyers, and working families (2018-2022 ACS 5-Year estimates, CoStar, MLS). Construction material costs, mortgage rates, and limited new construction in recent years have exacerbated these trends, with significantly fewer units permitted from 2020-2023 compared to prior years (US Census Bureau Building Permits). There is a mismatch between affordably priced owner- and renter-occupied homes in Suburban Cook County and the number of households to whom those units are affordable, particularly for the lowest-income households.

Cost of Housing

	Base Year (2017)	Recent Year 2022	Percent Change
Median Home Value	\$227,400	\$293,700	29%
Median Contract Rent	\$1,044	\$1,318	26%

Table 3 – Cost of Housing

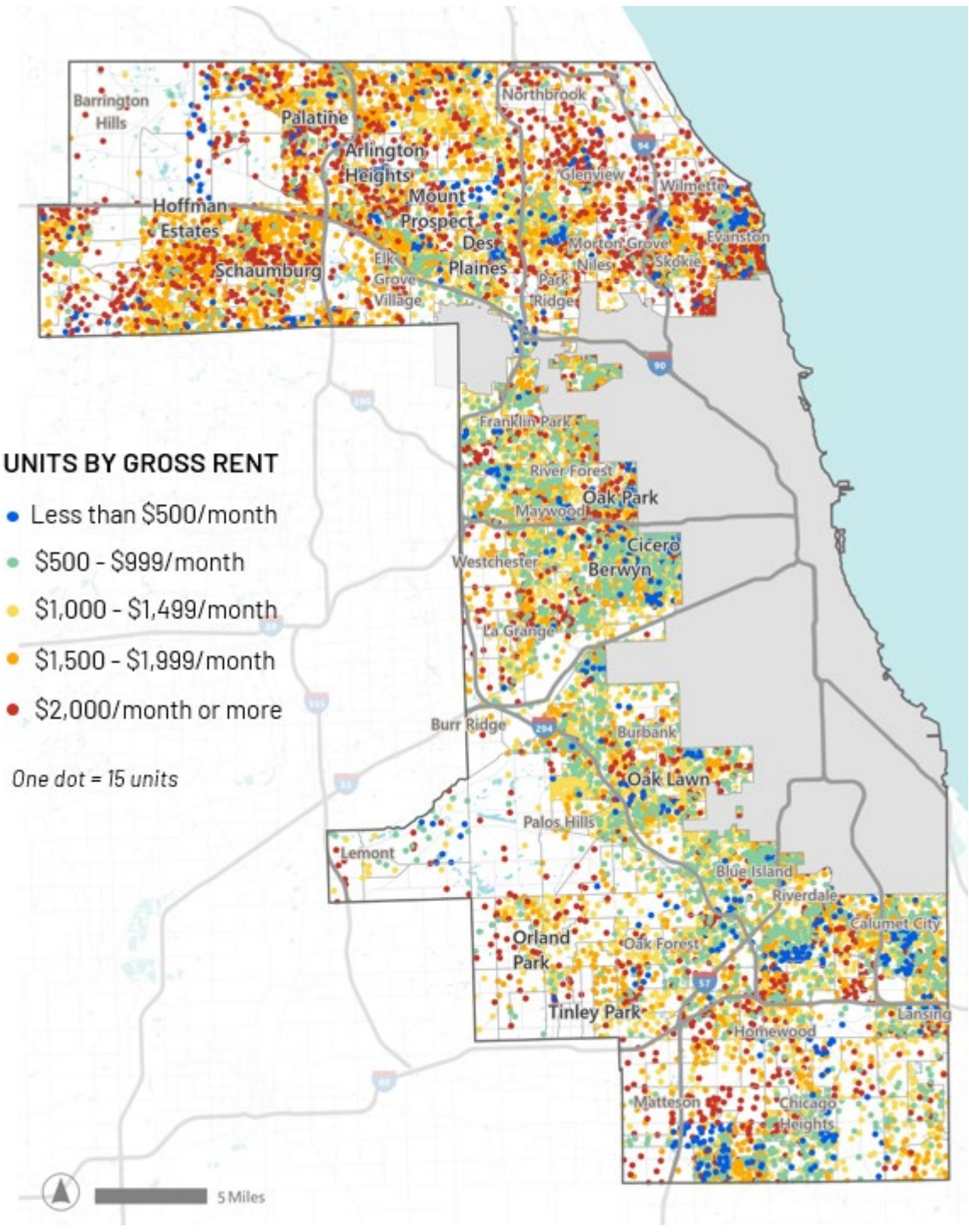
Data Source: 2013-2017 and 2018-2022 ACS 5-Year Estimates (Cook County)

Rent Paid

Rent Paid	Number	%
Less than \$500	21,190	8%
\$500-999	42,304	16%
\$1,000-1,499	105,105	40%
\$1,500-1,999	55,088	21%
\$2,000 or more	38,943	15%
Total	262,630	100%

Table 4 - Rent Paid

Data Source: 2018-2022 ACS 5-Year Estimates (2018-2022)



Source: ACS 5-Year Estimates (2018-2022)

Housing Affordability

Number of Units Affordable to Households Earning *	Renter	Owner
30% HAMFI	10,531	No Data
50% HAMFI	47,391	47,640
80% HAMFI	110,249	133,522
100% HAMFI	No Data	191,230
Total	168,171	372,392

Table 5 – Housing Affordability

* HAMFI indicates HUD Area Median Family Income

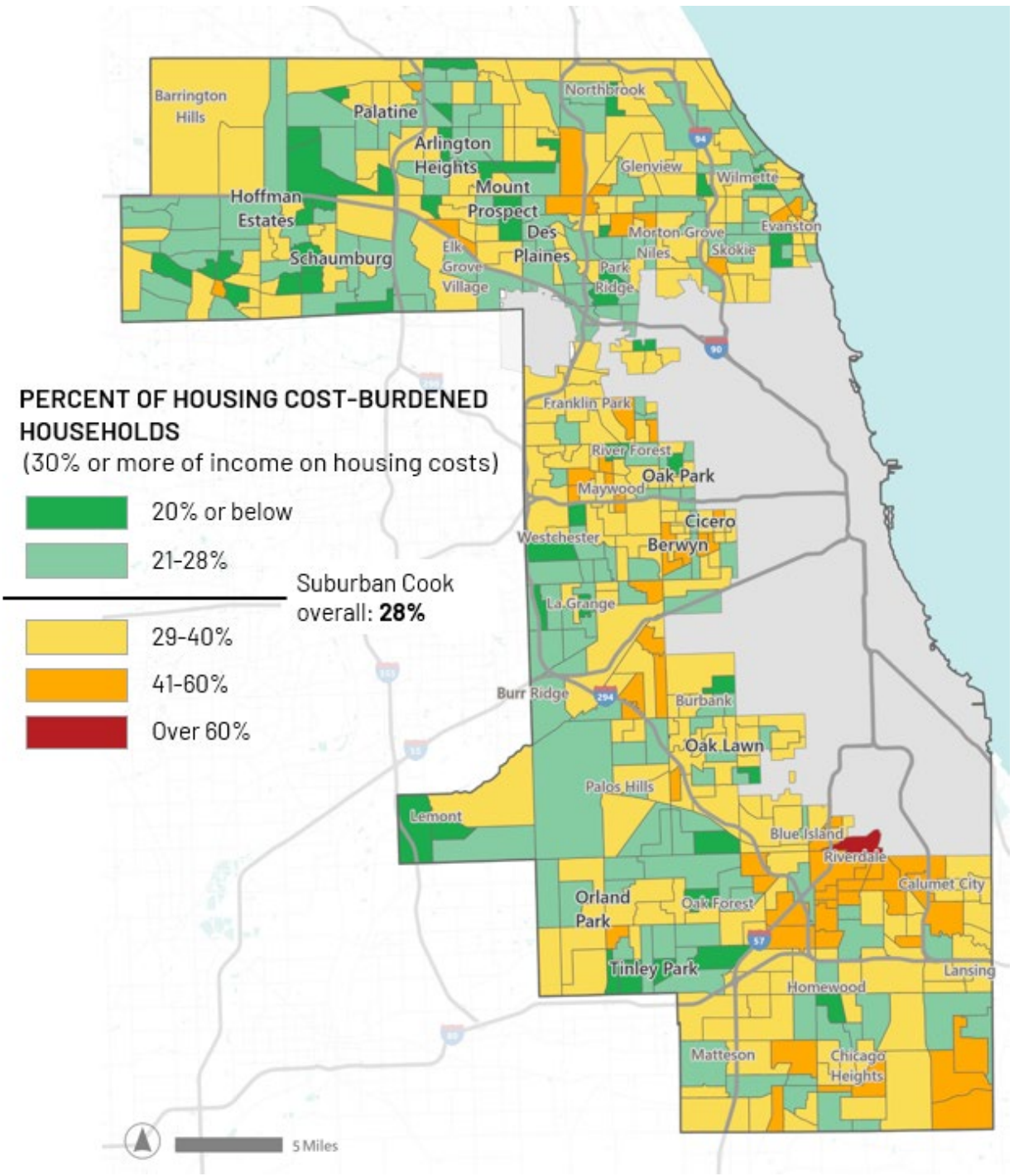
Data Source: 2016-2020 CHAS

Monthly Rent

Monthly Rent (\$)	Efficiency (no bedroom)	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom
Fair Market Rent	\$1,012	\$1,122	\$1,299	\$1,649	\$1,969
High HOME Rent	\$1,012	\$1,117	\$1,299	\$1,542	\$1,700
Low HOME Rent	\$816	\$874	\$1,048	\$1,211	\$1,491

Table 6 – Monthly Rent

Data Source: HUD FMR and HOME Rents, ACS 2017-2021 5-Year Estimates PUMS



Source: ACS 5-Year Estimates (2018-2022)

Is there sufficient housing for households at all income levels?

Across Suburban Cook County, there is a lack of affordable housing for households at the lowest income levels, driven primarily by limited residential construction and rising housing costs in recent years. Between 2020 and 2023, an average of 1,760 homes were permitted annually in Suburban Cook County (U.S. Census Building Permits). This is significantly lower than the average 6,620 units permitted annually between 2000 and 2008 and the 2,300 units annually from 2013 to 2019. Combined with limited supply, demand for housing—particularly units near jobs, economic centers, and amenities—has driven an increase in home values and rents across the county. Between 2017 and 2022, the county’s median home value increased by 29% and median rent increased by 26%. Sale prices have also increased dramatically in recent years, with the median single-family home sale price in Suburban Cook County rising by 75% between 2015 and 2024. This exacerbates challenges for households at the lowest income levels who are already more likely to be housing cost-burdened. Approximately 64% of Suburban Cook County households making under \$75,000 are housing cost-burdened, compared to only 9% of households making over \$75,000 (2018-2022 ACS 5-Year Estimates).

These dynamics have led to a shortage of affordable owner- and renter-occupied homes, particularly at the lowest income levels. For owner-occupied households, there is a 27,000-unit mismatch between housing units affordable to households earning less than 30% AMI and the number of owner households at that income level, and there is a 19,000-unit mismatch at the 30-60% AMI level. For renter-occupied units, the greatest mismatch impacts households earning less than 30% AMI, with 44,000 fewer affordably rented units than renter households earning less than 30% AMI. A mismatch of rental units at the highest income levels (over 120% AMI) also puts downward pressure on units in the middle of the market. Households earning more than 120% AMI are renting units affordable to households with lower incomes, increasing the competition for housing units affordable at 60-120% AMI and driving up housing costs for moderate-income, working households (ACS 2018-2022 5-Year Estimates).

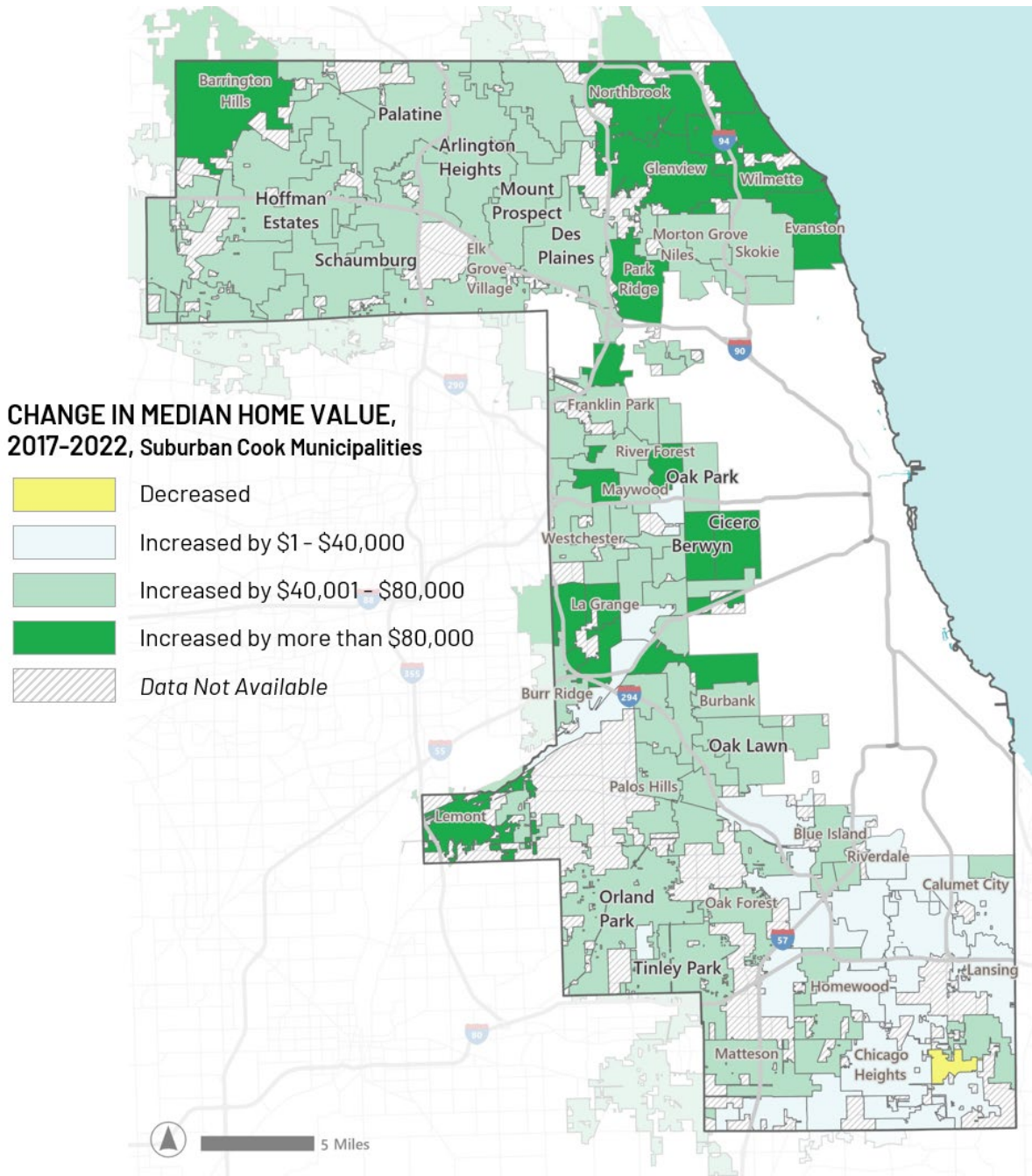
How is affordability of housing likely to change considering changes to home values and/or rents?

From 2017 to 2022, increases in home values in Suburban Cook County were greatest in several municipalities with lower initial home values, indicating potential affordability challenges for existing residents. Median home values increased by \$93,100 (52%) in Berwyn and \$85,200 (61%) in Cicero, two low-to-moderate-income western suburbs with 2017 home values below the Cook County median (ACS 2013-2017 and 2018-2022 5-Year Estimates). Property reassessments conducted in 2023 for the south and west suburbs resulted in significant increases in assessments and tax bills in most communities. Overall, there was a 15.1% increase in property taxes for the average single-family dwelling unit in the south and west suburbs (Cook County Clerk Tax Rate Report 2023). However, property tax increases were over 30% in some communities, particularly those in the south suburbs. Municipalities with the greatest average increase in tax bills for single-family homes included Dixmoor (+60.0%), Phoenix (+56.5%), and Calumet Park (+55.1%). For working class communities, significant increases in home values can lead to challenges with increased property taxes. This may lead to displacement if households are unable to absorb increased housing costs. While home values also increased across many northern suburbs, the

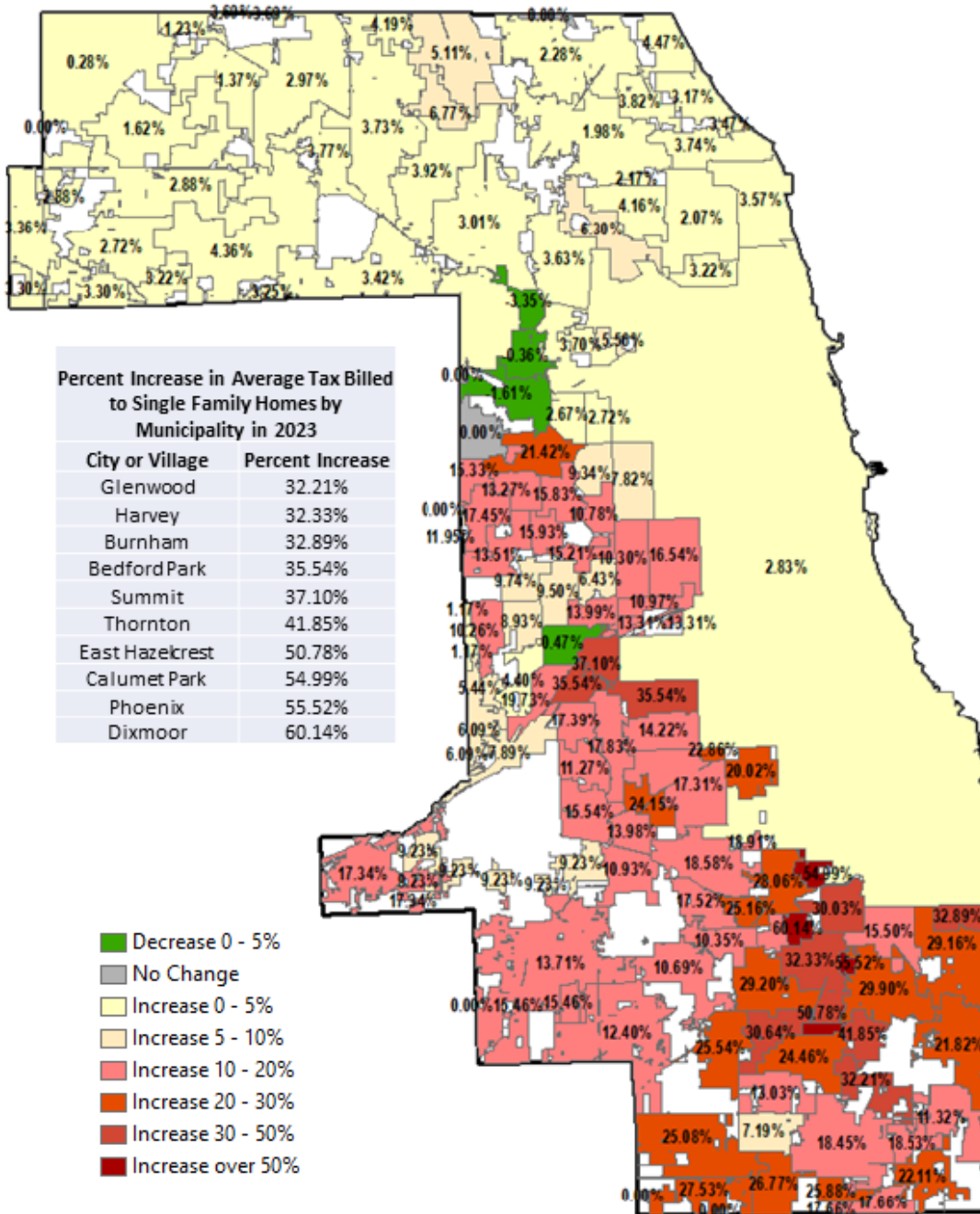
increases as a share of the initial home value were typically less. For example, the median home value in Northbrook increased by over \$100,000 between 2017 and 2022; however, this increase only reflects 20% growth relative to 2017.

Trends for rental housing are similar. Overall, average rents for new construction and existing market-rate multifamily units increased by 34%, or \$430/month, between 2015 and 2024 across Suburban Cook County (CoStar). Typically, new market-rate construction has a significant price premium over existing rental units. While the 2024 average rent across all market-rate multifamily rental units is \$1,700, the average asking rent per unit in a building constructed since 2020 in Suburban Cook County is \$2,500 (CoStar).

Affordability challenges are likely to continue given these market trends. Limited new construction, increased demand for housing near jobs and amenities, and rapidly rising sale and rent prices may continue to place pressure on low- and moderate-income households. This can lead to higher rates of housing cost burden and displacement. Cook County can help address these challenges by supporting new construction, preservation of existing units, and programs to assist low-income households in affording increased costs.



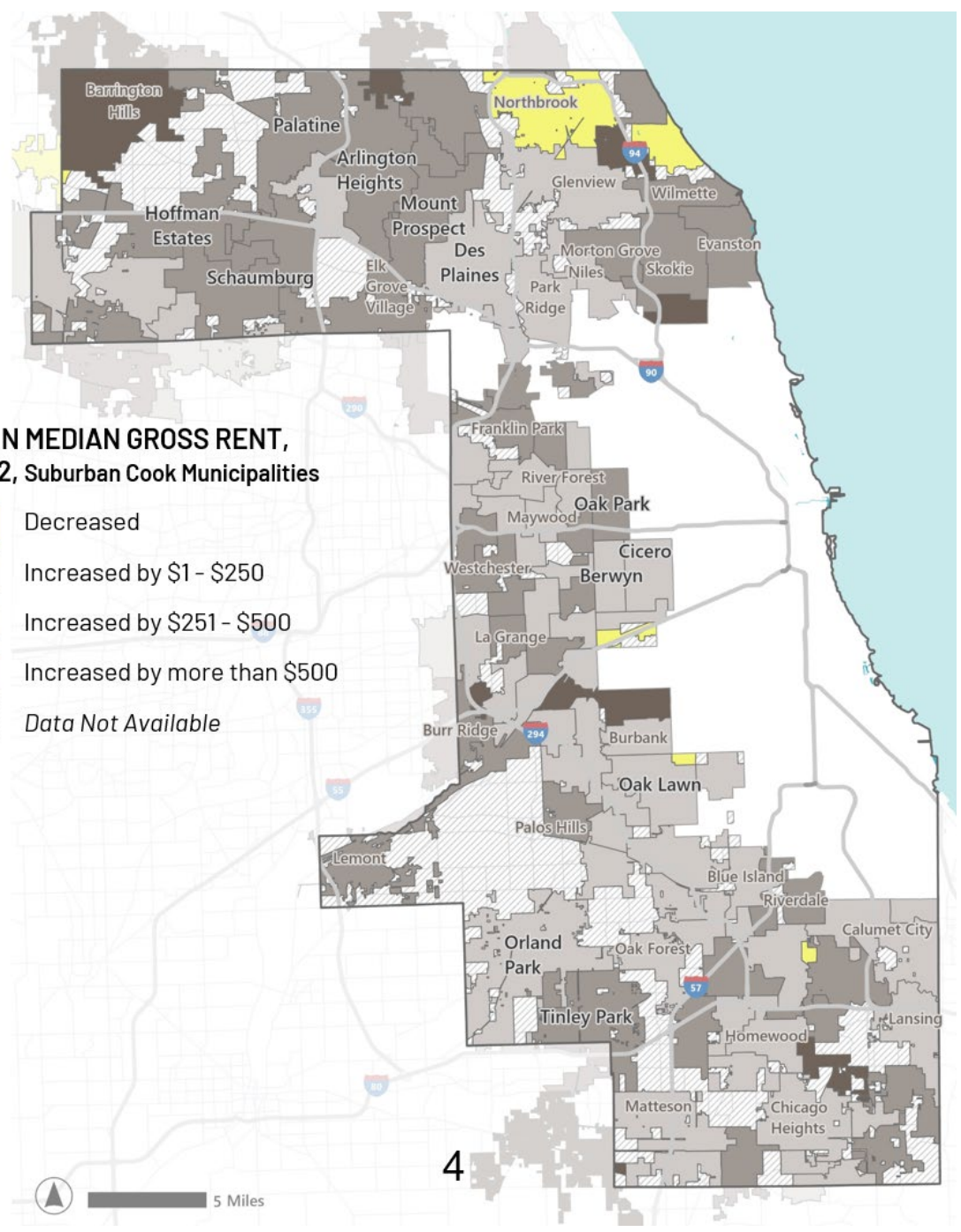
Source: ACS 5-Year Estimates (2013-2017 and 2018-2022)



Source: Cook County Clerk Tax Rate Report 2023

**CHANGE IN MEDIAN GROSS RENT,
2017-2022, Suburban Cook Municipalities**

- Decreased
- Increased by \$1 - \$250
- Increased by \$251 - \$500
- Increased by more than \$500
- Data Not Available



4

Source: ACS 5-Year Estimates (2013-2017 and 2018-2022)

How do HOME rents / Fair Market Rent compare to Area Median Rent? How might this impact your strategy to produce or preserve affordable housing?

Median rents in Suburban Cook County range from \$1,139/month for a studio to \$2,219/month for a 3-bedroom unit (CoStar). Comparatively, Fair Market Rents range from \$1,012/month for a studio to \$1,649 for a 3-bedroom unit, while Low HOME rents range from \$816/month for a studio to \$1,211/month for a 3-bedroom unit. High HOME rents are either slightly below or equal to Fair Market Rents, as shown in Table 36.

Based on this data, median rents in Suburban Cook County are marginally higher than Fair Market Rents and significantly higher than Low HOME rents. Overall, this dynamic points to a need for new units of affordable housing as well as preservation of existing, naturally occurring affordable housing. The differential between median rents and HOME rents / Fair Market Rent increases as unit sizes increase—for instance, median rent for a 3-bedroom unit is 35% higher than the Fair Market Rent for a 3-bedroom unit, while median rent for a studio is only 13% greater than the Fair Market Rent. This finding reflects feedback from steering committee members, focus group participants, and interviewees, which pointed to affordability challenges for families and other larger renter households due to limited inventory and high rent costs for larger units.

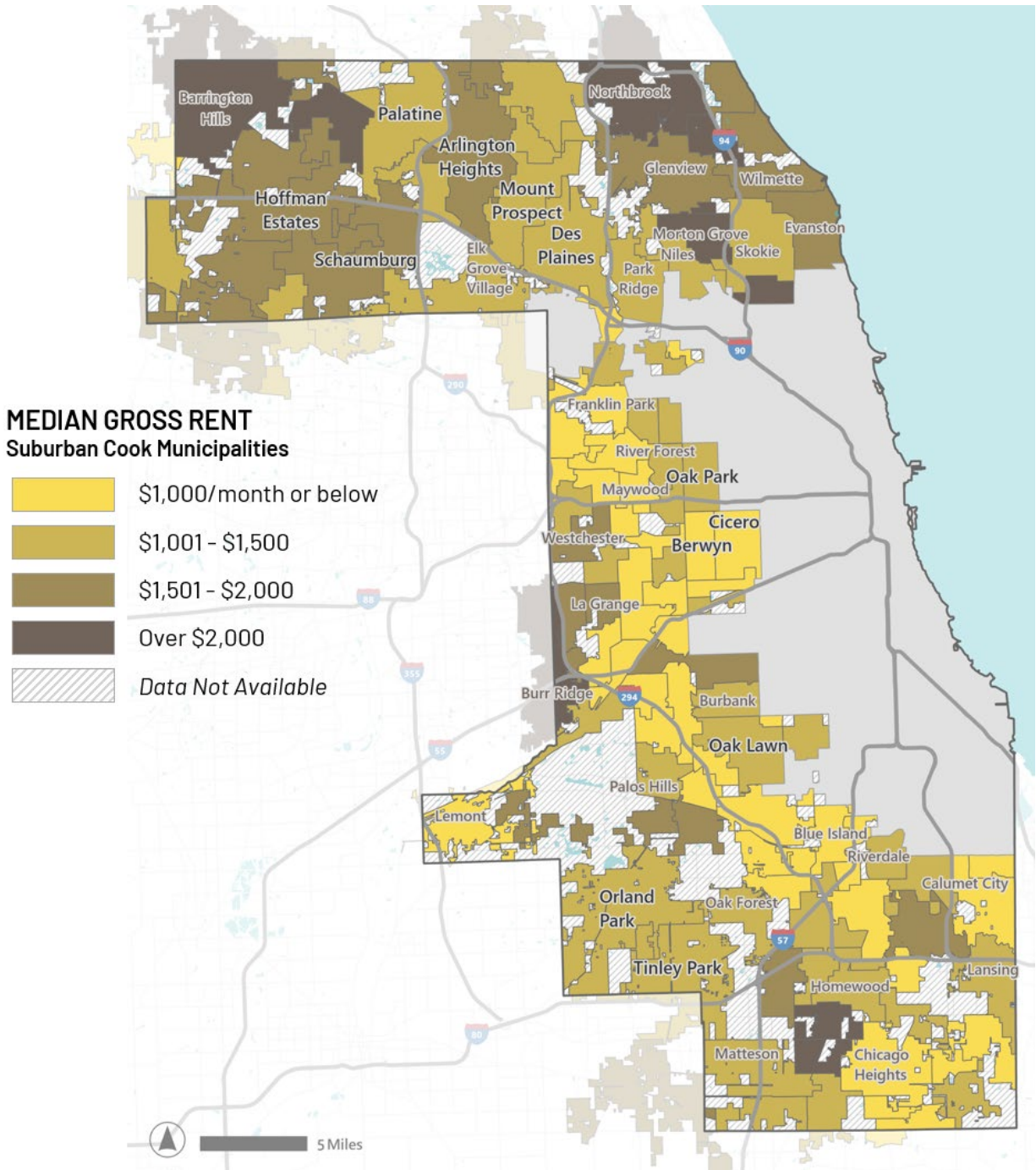
Median rents also vary considerably by geography. While the availability of units at lower rent levels is greater in the south and west parts of the county, the greater concentration of lower-income households in these areas impacts the feasibility of addressing critical maintenance conditions and rehabilitation needs related to housing age and lack of investment. Therefore, strategies will be focused on supporting new construction and catalytic investments, as well as investing in preservation and rehabilitation efforts to address housing conditions. Areas with high median rents — generally in the north part of the county — often offer greater economic opportunity and access to jobs, transit, and amenities. These communities tend to attract market-rate construction but often experience a relative lack of affordable housing. Increasing affordable housing construction in these areas can ensure lower-income families have access to housing in areas of economic opportunity.

Discussion

Affordability challenges are driven by market dynamics, including rapidly increasing rents and home values, property tax pressures, and limited new construction. These dynamics place pressure on low- and moderate-income households, which can lead to higher rates of housing cost burden and potential displacement. Housing age also impacts affordability. While lower-income areas may have more low-cost housing which is naturally affordable, this housing stock is also likely to be older, in substantial need of repair, and/or pose health risks due to substandard living conditions. The cost of essential improvements to ensure properties are code-compliant and safe for human habitation can be prohibitive for lower-income households, seniors, and others who have fewer resources.

Tackling the county's housing affordability challenges requires coordination across all levels of government, the private sector, nonprofits, and community-based organizations. Stakeholders pointed to

recent progress that had been made through increased regional coordination around advancing economic goals. The County, municipal governments, and advocates can leverage this successful model to identify and pursue new sources of funding, coordinate limited dollars to address areas of greatest need, and advocate for local and state policies that increase the supply of affordable homes for all residents.



Source: ACS 5-Year Estimates (2018-2022)

MA-20 Housing Market Analysis: Condition of Housing – 91.210(a)

Introduction

Suburban Cook County's housing stock is aging, with implications for quality of living and affordability. Generally, the age of housing reflects the county's major periods of growth, with population increasing rapidly in the mid-20th century before slowing considerably in the 1980s and subsequent decades. As a result, nearly three-quarters of all existing housing stock was built before 1980 — over 45 years ago (ACS 2018-2022 5-Year Estimates). Older housing units are more likely to have substandard living conditions, particularly if households lack the income or means for proactive maintenance. Nearly half (49%) of all rental housing stock in Suburban Cook County has at least one of the following housing conditions: lack of complete plumbing facilities, lack of complete kitchen facilities, more than one person per room, and cost burden greater than 30% (2016-2020 CHAS). Older housing built before 1980 is more likely to have lead-based paint, which presents health hazards to children. While housing built prior to 1980 is distributed across the county, communities with greater concentrations of lower-income residents are less likely to have the capacity to financially address building age-related housing issues. Additionally, while lower-income areas may have more low-cost housing that is naturally affordable, these housing units are also likely to be older, in substantial need of repair, and/or pose health risks due to substandard living conditions.

Describe the jurisdiction's definition of "standard condition" and "substandard condition but suitable for rehabilitation":

Standard condition is housing that is compliant with local applicable codes and poses no health or safety risks to its occupants or neighbors. Substandard housing condition is housing that has characteristics that pose a risk to the health, safety or physical well-being of its occupants, neighbors, and/or visitors. Nearly half (45%) of all rental housing stock in Suburban Cook County has at least one housing condition, including: lack of complete plumbing facilities, lack of complete kitchen facilities, more than one person per room, and/or cost burden greater than 30%. For owner-occupants, 27% reported at least one of these housing conditions. While some substandard housing may be suitable for rehabilitation and can achieve standard condition, other units may be beyond repair and best suited for reconstruction or demolition.

Condition of Units

Condition of Units	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
With one selected condition	123,035	27%	74,072	45%
With two selected conditions	2,368	1%	5,764	4%
With three selected conditions	114	0%	154	0%
With four selected conditions	0	0%	0	0%
No selected conditions	325,060	72%	84,577	51%
Total	450,577	100%	164,567	100%

Table 7 - Condition of Units

Data Source: 2016-2020 CHAS

Year Unit Built

Year Unit Built	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
2000 or later	61,736	9%	29,122	11%
1980-1999	121,804	18%	53,129	20%
1950-1979	363,061	54%	130,370	50%
Before 1950	127,109	19%	50,009	19%
Total	673,710	100%	262,630	100%

Table 8 – Year Unit Built

Data Source: ACS 5-Year Estimates (2018-2022)

Risk of Lead-Based Paint Hazard

Risk of Lead-Based Paint Hazard	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
Total number of units built before 1980	499,897	73%	191,559	70%
Housing units built before 1980 with children present	155,309	31%	65,114	34%

Table 9 – Risk of Lead-Based Paint

Data Source: ACS 5-Year Estimates (2017-2021) PUMS

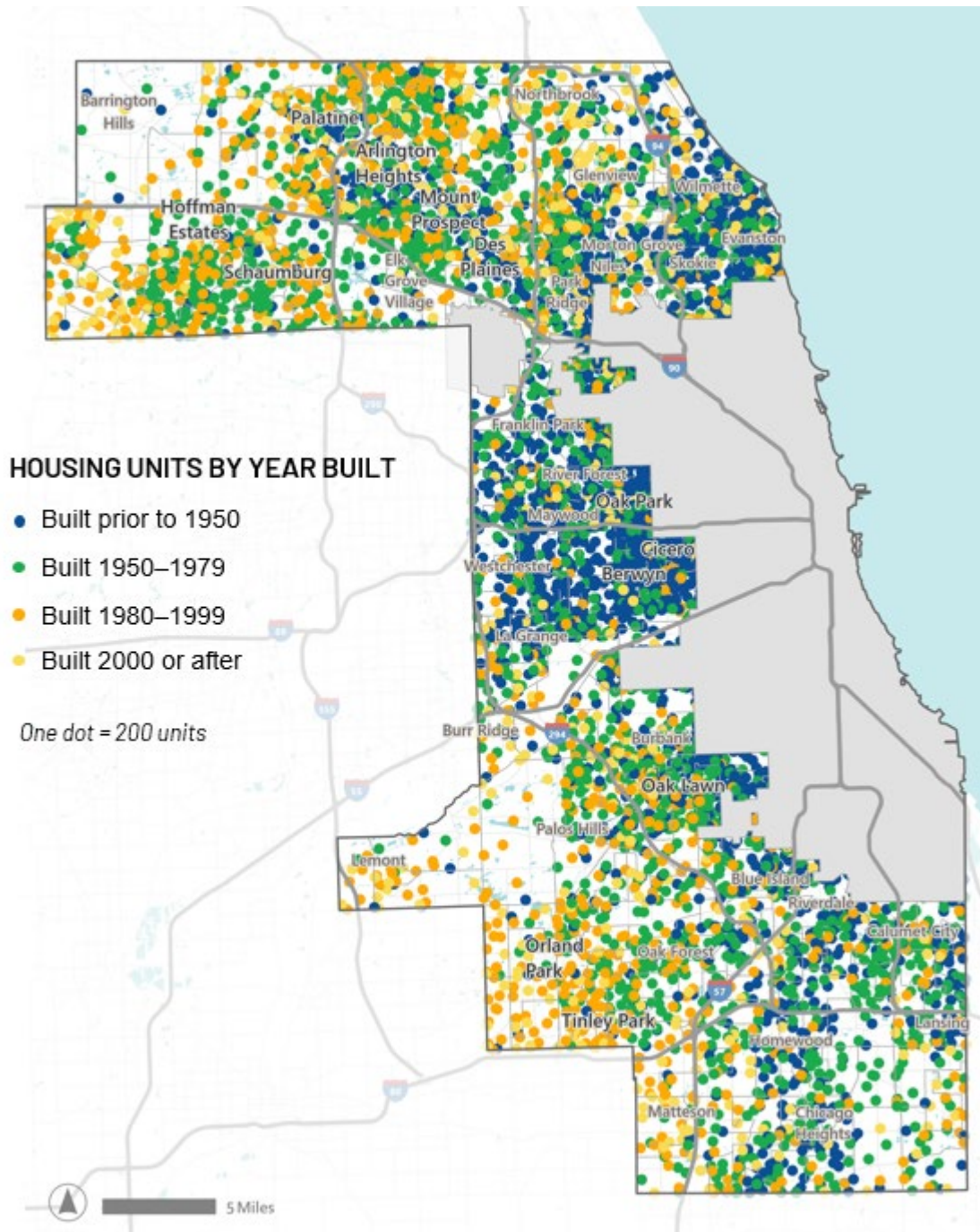
Vacant Units

	Suitable for Rehabilitation	Not Suitable for Rehabilitation	Total
Vacant units			
Abandoned vacant units			
REO properties			
Abandoned REO properties			

Table 10 - Vacant Units

* See description of data limitations on next page

Data is not available by suitability for rehabilitation. There are 66,275 vacant units in Suburban Cook County, representing 7.1% of the total housing stock (2018-2022 ACS 5-Year Estimates), and 4,668 real-estate owned properties, which may indicate disrepair if properties have been vacant since the time of foreclosure (DePaul University Institute for Housing Studies, 2022). Totals cannot be entered directly in IDIS.



Source: ACS 5-Year Estimates (2018-2022)

Need for Owner and Rental Rehabilitation

As noted in Table 39, 73% of Suburban Cook County owner-occupied housing and 70% of renter-occupied housing was constructed prior to 1980. The use of lead-based paint in residential structures — a significant health hazard, particularly for children — was federally banned in 1978. As such, these units are presumed to contain lead-based paint unless they have been substantially renovated, and may suffer from deferred maintenance or condition issues. Reflecting historic growth patterns, there are high concentrations of housing units built prior to 1980 across inner-ring suburbs near Chicago.

While most older units require rehabilitation, low-income households may be less able to financially address rehabilitation needs. DPD will prioritize these areas for investments in preservation and rehabilitation to support low-income households, including those with children. Communities with lower median incomes and the prevalence of housing constructed prior to 1980 include many western suburbs, such as Maywood and Berwyn, and southern suburbs, such as Blue Island and Riverdale.

Prior to project funding, DPD ensures that all units are inspected to identify any presence of hazards and adverse housing conditions. DPD also requires that a Phase 1 Environmental Assessment is completed for all residential projects that are funded. If lead-based paint is detected, DPD requires a remediation plan to be implemented to mitigate and minimize the harmful effects of lead-based paint that pose a risk to all occupants of the building(s). Recent federal guidance also requires that units be inspected for the presence of radon. The EPA recommends homes be remediated if the radon level is 4 pCi/L or more. If the radon levels exceed 4 pCi/L, DPD requires a mitigation plan.

Estimated Number of Housing Units Occupied by Low or Moderate Income Families with LBP Hazards

Overall, 72% of the county's total housing stock was constructed prior to 1980 and is presumed to contain lead-based paint (2017-2021 ACS 5-Year Estimates PUMS). Negative health impacts from lead-based paint are most acute for children. Approximately 220,423 households with children live in homes built prior to 1980. Of these households, 24% (52,477) are low-income and 17% (38,440) are moderate-income. These households may have fewer resources to remediate lead paint hazards (2017-2021 ACS 5-Year Estimates PUMS).

Discussion

Housing preservation is important to help maintain the existing housing stock and its affordability, increase housing security, and support positive health outcomes for existing residents. Steering committee and focus group participants uplifted the importance of investing in the county's aging housing stock — especially in areas of disinvestment like the south and west suburbs — during facilitated strengths, weaknesses, opportunities, and threats exercises. Prior to project funding, DPD ensures that all units are inspected to identify any presence of hazards and adverse housing conditions that will need to be addressed during renovation. If DPD proceeds with funding rehabilitation or renovation, DPD consults with the State Historic Preservation Office to determine if improvements are permissible before moving forward. In the short term, failure to address housing conditions can result in health and safety challenges

and increased costs for residents. In the long term, it can lead to a decrease in the number of housing units, household displacement, and economic instability for families. Investing in the county’s existing housing can prevent these adverse impacts and help promote health and stability for residents and families.

MA-25 Public and Assisted Housing – 91.210(b)

Introduction

Since the prior Con Plan submittal in 2020, the Maywood Housing Authority has been dissolved. There are currently four housing authorities operating within Suburban Cook County: the Housing Authority of Cook County (HACC), Oak Park Housing Authority (OPHA), Cicero Housing Authority (Cicero HA), and Housing Authority of Park Forest (HAPF). The Project Team reached out to all four housing authorities via email requesting participation in the planning process, and conducted interviews with HACC and the OPHA. The Cicero HA provided a written response via email, but did not provide specific data on units. The HAPF did not respond to multiple email requests for an interview and data. Though no data was provided by HAPF, their website indicated they administer 156 public housing units. These units are accounted for in the total number of public housing units, but no detailed breakdown of resident characteristics was available.

HACC is by far the largest of the four housing authorities, both in geographic scope and the number of units and vouchers administered. HACC operates 263 units of public housing and administers approximately 13,888 housing vouchers. As of February 2025, there are more than 1,000 applicants on the HACC waitlist for public housing and more than 8,400 on the waitlist for rental assistance vouchers. The waitlist for vouchers include over 500 elderly individuals, 1,345 individuals with disabilities, and more than 6,500 families. The waitlist for Veterans Affairs Supportive Housing is maintained by the Department of Veterans Affairs and no detail was available on the number of individuals on their waitlist. OPHA operates 198 units of public housing and administers approximately 551 vouchers. The HAPF administers 156 vouchers, according to their website.

More detail on public housing units is provided in the following table. Note that “Certificate” and “Mod-Rehab” are outdated terms no longer used by HACC or OPHA and such units have generally transitioned to the Rental Assistance Demonstration (RAD) housing model, as discussed in the following section. HACC and OPHA do not track data for certain characteristics, such as certain demographic categories. Detail on the number of accessible units, outlined in the following table, reflects only information provided by OPHA.

Totals Number of Units

	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project-based	Tenant-based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
Number of units vouchers available	0	0	461	14,595	1,477	12,849	579	189	198
Number of accessible units	0	0	19	98	0	98	0	0	98
*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-Year, and Nursing Home Transition									

Table 11 – Total Number of Units by Program Type

Data Source: HACC, OPHA

Describe the supply of public housing developments:

The number of public housing units has continually declined in recent years, as most public housing units owned and operated by HACC have transitioned to the RAD housing model. Only five developments owned and operated by HACC remain, with 263 units of public housing; these may also undergo future RAD conversion. HACC manages a voucher program with 13,888 total vouchers, which provides a substantial source of funding for affordable housing in Suburban Cook County. OPHA owns and operates one development with 198 units of public housing. Other housing authorities in Suburban Cook County own few or no units and primarily manage vouchers in their communities. The Cicero HA noted that continued housing construction and rehabilitation are crucial to increasing the local housing supply and ensuring there are sufficient and acceptable quality units available for voucher holders.

Describe the number and physical condition of public housing units in the jurisdiction, including those that are participating in an approved Public Housing Agency Plan:

There are 263 units of public housing in five developments owned and operated by HACC. The most recent inspection scores for the five developments as of February 2025 ranged from 71 to 90, with an average score of 84. In the prior plan, average inspection scores ranged from 39 to 99 across nearly 100 properties. DPD requires that a Phase 1 Environmental Assessment is completed for all residential projects that are funded in conjunction with HACC. If lead-based paint or other hazards are detected, DPD requires a remediation plan to be implemented.

OPHA indicated only one public housing development, Mills Park Tower, is within their jurisdiction. Mills Park Tower contains 198 units of senior housing, with an average inspection score of 88, the most recent available as of March 2025. Individual units are evaluated for potential repairs when tenants vacate the units and are updated as needed. The building’s exterior and common areas have been updated multiple times in recent years.

Public Housing Condition

Public Housing Development	Average Inspection Score
Average across all HACC	84
Summit Senior Villas (HACC)	89
Summit (Senior) (HACC)	90
Riverdale (HACC)	83
Scattered Sites (HACC)	71
Sunrise Apartments (HACC)	86
Mills Park Tower (OPHA)	88

Table 12 - Public Housing Condition

Data Source: HACC, OPHA

Describe the restoration and revitalization needs of public housing units in the jurisdiction:

As public housing units age, there is a continual need for rehabilitation and renovation to maintain a safe environment and quality standard of living for residents. The oldest public housing development within the HACC portfolio is Sunrise Apartments, originally constructed in the 1960s, and currently undergoing a full renovation through the RAD program. Renovation of the 207 existing units is being completed alongside the development of 30 new units that will be fully accessible to those with disabilities. DPD conducted a Phase 1 Environmental Assessment on Sunrise Apartments, consulted with the State Historic Preservation Office, and notified the project managers of the required mitigation for the project. The Sunrise Apartments renovation project is expected to benefit current and future residents of the community and is well-supported by the municipality.

One of HACCs newer properties—Summit Senior Living—experienced a fire in 2024 that resulted in damage to several residential units. HACC is currently in the process of rehabilitating these units.

For scattered site development, the condition and rehabilitation status of units varies, with some units currently unoccupied due to the need for substantial rehabilitation. HACC is currently working with a consultant to position the portfolio of scattered site properties for conversion to RAD, which would include rehabilitation when needed, with a goal of reducing vacancies and increasing available units.

Describe the public housing agency's strategy for improving the living environment of low- and moderate-income families residing in public housing:

With an aging public housing stock, there is a continual need to address maintenance and restore and rehabilitate a significant number of units. Housing authorities have undertaken recent renovations based on the most pressing needs. Renovation in other properties is needed, particularly for currently vacant units that require rehabilitation to become habitable again. HACC seeks to prioritize renovations that not only improve the quality of units but can also provide additional amenities or accessibility accommodations to improve the lives of residents.

HACC and OPHA have pursued open communication between residents and property managers to better understand and respond to community needs. Public housing residents often meet with property management to discuss current needs including program offerings, building and grounds maintenance, or other concerns. HACC is supportive of resident volunteers who act as liaisons between management and residents. HACC seeks to uplift resident champions who voice resident concerns and serve as a point of communication to ensure the needs of residents are heard and met.

Discussion:

HACC and OPHA collectively own and operate 461 units of public housing in Cook County. Units are generally in good condition, with 6 of 7 properties having average inspection scores of at least 83, and one property with an average inspection score of 71. The average inspection score across all of HACC's properties was 84, with an OPHA property at 88. Additionally, HACC, OPHA and HAPF together administer more than 14,500 vouchers, most of which are tenant-based housing vouchers. Extremely long wait lists

for public housing and housing vouchers are evidence of the demand; therefore, maintaining the affordable housing stock in Suburban Cook County is vital along with increasing funding to meet the needs of residents. DPD maintains an active role in ensuring rehabilitation projects receive environmental reviews to determine the presence of lead-based paint or other hazards and, if hazards are detected, ensuring a mitigation plan is in place.

MA-30 Homeless Facilities and Services – 91.210(c)

Introduction

Insufficient affordable housing and rising homelessness in Suburban Cook County have increased the strain on facilities and services addressing the needs of residents experiencing or at risk of homelessness. There is a significant need for more services, temporary shelter and permanent supportive housing units to alleviate urgent challenges and help break the cycle of homelessness. The following table notes the number of beds targeted to various groups by the level of support provided (i.e., emergency shelter, transitional housing, permanent supportive housing, etc.). As of April 2025, there were 1,008 emergency shelter beds, 372 transitional housing beds, and 4,822 permanent supportive housing beds in Suburban Cook County. Of permanent supportive housing beds, 760 are reserved for veterans experiencing homelessness and approximately half are intended for persons experiencing chronic homelessness (Alliance). No additional beds are known to be under development.

The Alliance elaborated on programs applicable to certain special needs populations, in addition to emergency shelter, in an interview with the Project Team. Housing placements for chronically homeless individuals often necessitate a permanent supportive housing unit and housing choice voucher. PSH offers a coordinated mix of supportive services to address the causes of homelessness related to disability, healthcare, counseling, and other needs. Other options include transitional housing, often available across scattered site units or dedicated units within a multifamily building owned by a nonprofit that has a master lease of all units. Veterans can receive specific supportive housing tailored to their needs via Veterans Affairs Supportive Housing (VASH), the largest permanent supportive housing segment. There are approximately 760 beds dedicated to veterans across housing authorities.

Facilities and Housing Targeted to Homeless Households

	Emergency Shelter Beds		Transitional Housing Beds	Permanent Supportive Housing Beds	
	Year-Round Beds (Current & New)	Voucher/ Seasonal/ Overflow Beds	Current & New	Current & New	Under Development
Households with adult(s) and child(ren)	410	207	274	478	0
Households with only adults	386	0	98	1,173	0
Chronically homeless households	0	0	0	2,411	0
Veterans	0	0	0	760	0
Unaccompanied youth	5	0	0	0	0

Table 13 - Facilities and Housing Targeted to Homeless Households

Source: Alliance

Describe mainstream services, such as health, mental health, and employment services to the extent those services are used to complement services targeted to homeless persons

Residents experiencing or at risk of homelessness who make contact with the coordinated entry system undergo a needs assessment that broadly evaluates their current situation and unique barriers to housing security. Addressing the underlying causes of homelessness often requires addressing employment and physical or mental health challenges. Resolving these underlying factors that are the root causes of homelessness can successfully keep those who at risk of homelessness in housing and break the cycle for those experiencing chronic homelessness.

The needs of individuals or families are assessed when they enter the coordinated entry system, informing shelter referral. For example, those with disabilities, mental illness, or substance abuse disorders may require specific housing that is more accommodating of their needs. Case workers and counselors work with individuals to secure treatment, make connections to programs and resources, and/or meet healthcare needs. Cook County values a holistic approach to service provision to limit reentry into the system where possible.

The Project Team interviewed the Alliance, which noted the overarching goal of first providing safe and stable housing, and only then working to connect individuals experiencing homelessness to specific healthcare and employment programs. Eligible individuals are connected to benefits programs such as social security, disability, and health insurance via CountyCare, a local Medicaid health plan. Healthcare resources are administered through homelessness service providers or through partnerships with Federally Qualified Health Centers (FQHCs). While these partnerships are an important part of providing

healthcare to those experiencing homelessness, more resources for in-house services at shelters and resource centers for the homeless are also needed. The Alliance noted mental health resources in particular are lacking and often at capacity.

Employment services are also available to those who are experiencing homelessness, ideally connecting people to stable employment to increase their income and ability to live independent of public assistance. Workforce development programs, such as those funded by the Workforce Innovation and Opportunity Act, connect individuals to training and employment opportunities that offer stable income.

The Alliance indicated in an interview that additional investment in workforce development is needed, particularly in connecting homeless individuals to training and work opportunities. More frequent communication and coordination between workforce development providers and employers would benefit job seekers and result in improved program outcomes. Several pilot programs are currently underway to remove employment barriers for individuals experiencing housing instability. One such program, the Barrier Reduction Fund, will evaluate the impact of paying for childcare, transportation, and other cost barriers to improve employment and housing outcomes for recipients.

List and describe services and facilities that meet the needs of homeless persons, particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth. If the services and facilities are listed on screen SP-40 Institutional Delivery Structure or screen MA-35 Special Needs Facilities and Services, describe how these facilities and services specifically address the needs of these populations.

Suburban Cook County utilizes a coordinated entry system as a single point of entry to the various services provided by the County and nonprofits. A resident may access the coordinated entry system by going to an entry point location (often a nonprofit partner), by referral from a healthcare provider after receiving care, or by calling “211” to speak with a client navigator or representative that assesses their immediate needs. The “211” hotline covers all of Cook County. Depending on whether the caller is currently homeless or at risk of homelessness, the individual will be referred to the appropriate program providers, including the coordinated entry system. Those who anticipate experiencing homelessness within the next 14 days can be connected to services to either attempt to mediate the situation with their current housing provider, or in some cases receive temporary assistance to avoid entering homelessness. Those who are experiencing homelessness or at imminent risk of homelessness within hours or days are directed to resources to help them transition safely to a shelter and/or receive healthcare, food, or other services, as necessary. Some nonprofits, such as Connections for the Homeless, provide walkup services like laundry, shower facilities, and food pantries. Some shelter locations offer medical respite beds, which provide individuals exiting medical treatment at risk of homelessness a place to recover, to minimize the chances of their recovery being aggravated by the challenges of homelessness.

Individuals needing shelter may be directed to a specialized shelter, depending on their needs. Specialized shelters in Suburban Cook County serve unaccompanied youth, victims of domestic violence, veterans, and other groups with special needs. Nonprofits also provide supportive housing that includes wraparound services. Services are tailored to residents’ needs and may include counseling, employment

support, and healthcare. Nonprofits that work with specific populations (such as The Harbour for unaccompanied youth or AIDS Foundation Chicago) may also provide specialized support and services based on the unique needs of these populations. Supportive housing programs aim to increase overall stability to prepare individuals to live independently.

Youth (ages 17 or younger) also face specific challenges compounded by homelessness, particularly unaccompanied youth. Youth have a particularly difficult time securing housing services as they are often not considered the head of the household and eligible for assistance. Unaccompanied youth fall outside the service area of many traditional programs, with limited shelter or program options available to them beyond those provided by the Illinois Department of Children and Family Services (DCFS). The Harbour and Shelter Inc are two organizations that provide unaccompanied minors specifically with programming and shelter.

Finally, some nonprofits, such as Connections for the Homeless, offer after-care services to the individuals they have worked with. After-care services may include assisting with finding housing, funding application fees or security deposits to help secure housing, or providing additional counseling and social services. These services are designed to help individuals transition successfully back to independent living and maintain their housing over the long term to minimize their likelihood of returning to homelessness.

MA-35 Special Needs Facilities and Services – 91.210(d)

Introduction

Individuals with intersecting health and housing needs may require stable housing with wraparound services, known as PSH. PSH combines affordable housing for low-income residents with targeted services aimed at addressing health challenges and other special needs. The combination of affordable housing with specialized services can have positive effects on residents' housing stability, mental health, employment outcomes, and quality of life. The Project Team conducted interviews with nonprofit organizations working directly with numerous special needs populations, including the elderly, persons with disabilities, returning residents, persons living with HIV/AIDS, and others, to understand the range of housing and supportive service needs. Overall, addressing needs can help prevent members of special needs populations from experiencing homelessness, increase their housing stability, and support positive health outcomes.

Including the elderly, frail elderly, persons with disabilities (mental, physical, developmental), persons with alcohol or other drug addictions, persons with HIV/AIDS and their families, public housing residents and any other categories the jurisdiction may specify, and describe their supportive housing needs

Affordable, stable housing is a critical need for all special needs populations, as they are often at a disadvantage due to their elevated healthcare, transportation, or accommodation needs, particularly in the current competitive housing market. Consequently, these populations are at a higher risk of experiencing homelessness, further challenging their ability to manage their health, employment, and general stability. Increasing the supply of affordable housing is crucial to reducing rates of homelessness and improving health outcomes among these groups.

Those with special needs are likely to differ in the degree to which they rely on supportive services. For example, those with physical disabilities experience different challenges than those struggling with substance abuse or finding steady employment. Services can include transportation, health services, counseling, substance abuse treatment, and/or life skills training. Ultimately, the available service mix will be tailored to the special needs of each individual with the goal of creating stable housing, health, and employment outcomes.

There are special needs populations such as addiction, mental illness, and HIV/AIDS persons who may not need as frequent of care or the same degree of care. Supportive services for these groups may include counseling, employment, or support with access to education and workforce opportunities.

Describe programs for ensuring that persons returning from mental and physical health institutions receive appropriate supportive housing

There are approximately 40 medical respite beds in Suburban Cook County. Respite beds provide temporary shelter for those who have completed medical treatment or a visit to the emergency room, but where recovery may be threatened due to exiting into homelessness upon leaving the hospital. Respite beds allow for additional recovery and recuperation to prevent complications or exacerbation of medical conditions during fragile recovery periods. There is a significant need for additional respite beds — the 40 existing beds in the county are consistently at capacity. During the COVID-19 pandemic, a new program was developed in partnership with Housing Forward and Cook County Health to increase the number of medical respite beds. An existing single-family house was outfitted to accommodate 18 beds to be used for medical respite, accepting referrals from any emergency department. This program could serve as a model for further increasing the number of medical respite beds in Suburban Cook County.

For those being discharged from mental health institutions, there are fewer options. Often, individuals leave such facilities with referrals for additional services. The need for such services is great, and many residents who need services are unable to receive them due to cost or transportation. Mental health institutions may have some flexibility to retain patients briefly to assist in finding housing, but this is not always successful, and can strain staff capacity. Suburban nonprofits are working to identify ways that funding may be used to create bridge housing, similar to respite beds, but for those leaving mental health

institutions. Bridge housing would allow patients to avoid homelessness and receive additional services that could prevent or reduce re-admittance to mental health institutions or homelessness. Example solutions might include a master lease of an apartment building where units can serve this purpose, or on-site housing near facilities that discharge patients.

Specify the activities that the jurisdiction plans to undertake during the next year to address the housing and supportive services needs identified in accordance with 91.215(e) with respect to persons who are not homeless but have other special needs. Link to one-year goals. 91.315(e)

Housing vouchers in Suburban Cook County are fully leveraged and PSH is consistently at or near full occupancy. The advocacy and partnership between the County, housing authorities and nonprofits will continue over the next five years to achieve common goals. DPD will continue to coordinate closely with the Alliance and all four housing authorities to facilitate appropriate linkages between housing and services for those with special needs. The Alliance is currently in the process of developing a new strategic plan. This plan will involve coordination with other service providers, the County, and nonprofits that assist special needs populations. Additionally, Uplift Cook will continue to advance several of the goals outlined in the Alliance's prior strategic plan, including expanding access to rapid re-housing and increasing PSH, which target special needs populations.

For entitlement/consortia grantees: Specify the activities that the jurisdiction plans to undertake during the next year to address the housing and supportive services needs identified in accordance with 91.215(e) with respect to persons who are not homeless but have other special needs. Link to one-year goals. (91.220(2))

As noted above, DPD will continue to prioritize PSH and rapid re-housing. Additionally, DPD will continue to facilitate coordination with the Alliance, housing authorities, and other service providers in the public health, mental health, disability, and workforce development spheres to address the housing and service needs of persons who are not homeless but have other special needs. DPD will ensure that PSH targets populations with intensive service needs, including but not limited to those who are experiencing long-term homelessness, vulnerable, and the hardest to house. Moreover, DPD will work to assist the Alliance in meeting its goals of increasing the amount of PSH available in Suburban Cook County by 257 beds, and rapid re-housing by 372 slots over the next three years.

MA-40 Barriers to Affordable Housing – 91.210(e)

Negative Effects of Public Policies on Affordable Housing and Residential Investment

While many factors that contribute to the affordable housing shortage are market-driven, certain public policies and actions also limit new affordable and market-rate residential development. The County's property tax structure was one of the primary challenges to residential development noted across focus groups, interviews, and steering committee meetings. Stakeholders highlighted that multifamily property assessment inconsistencies and volatility force developers to carry significantly higher operating reserves to secure loan financing for new development and deter the institutional capital needed to finance large projects. Inconsistencies in the assessment process can also create affordability challenges for residents of existing housing, particularly if property taxes increase at a faster pace than incomes. This can especially impact low- and moderate-income households in gentrifying neighborhoods and areas with greater access to economic opportunity, transit, and amenities. Cook County's higher assessment ratio for commercial properties compared to residential properties makes the county less competitive for commercial and industrial development than neighboring counties and competitive locations nationally. As businesses leave the county for surrounding counties and states with more favorable tax conditions, residents are left with a greater share of the property tax burden. This dynamic has particularly adverse impacts in low-income areas of the county with smaller existing tax bases.

Other public policies with negative impacts on affordable housing and residential investment fall primarily under the purview of local municipalities, including restrictive zoning, arduous and/or unclear development permitting and entitlement processes, and local resident opposition to new development (i.e., NIMBYism). These factors result in increased costs, time, and development risk, all of which deter investment. Ultimately these regulations — particularly zoning restrictions and NIMBYism — limit the supply of housing, leading to higher prices and more competition for limited affordable housing. Moreover, most municipalities are home-rule jurisdictions, limiting the County's ability to implement comprehensive policies and regulations to mitigate this issue.

MA-45 Non-Housing Community Development Assets – 91.215 (f)

Introduction

Cook County has a dynamic, established economy with a gross regional product (GRP) exceeding that of many states and nations. More than 650,000 businesses represent a diverse range of industries, including significant concentrations in finance & insurance, business & professional services, transportation, distribution & logistics (TD&L), manufacturing, food innovation & manufacturing, and life sciences. The county draws from a strong regional workforce, leveraging an ecosystem of over 500 accredited postsecondary programs. Robust transportation infrastructure — including two international airports, public transit, and multiple railways, ports, and highways — connects residents, businesses and communities to economic opportunities across the region, nation, and world.

While the county has a strong economy, not all populations and communities have experienced economic success to the same degree. Investing in education and training opportunities, attracting jobs in high-growth industries, and addressing barriers to employment can help promote economic growth that benefits all residents. The Chicago Cook Workforce Partnership operates one of the largest public workforce systems in the country, overseeing dozens of programs that address barriers to employment and connect residents to job opportunities.

Economic Development Market Analysis

Cook County's economic base is established, diverse, and dynamic. As of December 2024, the county's economic output was \$504.7 billion as measured in GRP, greater than the GRPs of 34 states and the District of Columbia (Lightcast). Between 2010 and 2023, county GRP grew at a compound annual growth rate (CAGR) of 4.1% (U.S. Bureau of Economic Analysis (BEA), Lightcast). The county accounts for a significant portion of the regional economy in terms of both GRP and jobs, comprising 63% of regional GRP and 62% of regional jobs. No single sector accounts for more than 16% of GRP or 14% of jobs, indicating the diversity of the economic base. A strong network of transportation and logistics infrastructure, a legacy manufacturing ecosystem, and connections to domestic supply chains provide the county with a significant competitive advantage across multiple sectors.

In 2023, the seven Chicago region counties and the City of Chicago formed the Greater Chicagoland Economic Partnership (GCEP) with the goal of driving economic development on a coordinated, regional level. Recommendations outlined in GCEP's reports and analysis focus on the ways that each county and jurisdiction can best position itself to take advantage of and build key industries that are poised for growth and leverage the region's strengths. These GCEP-identified key regional industries are: (1) manufacturing, (2) business and professional services, (3) finance and insurance, (4) TD&L , (5) food manufacturing and innovation, and (6) life sciences. Focus group and steering committee stakeholders pointed to the formation of GCEP, and its success in building partnerships across organizations and jurisdictions, as one of the region's key strengths.

There are over 2.5 million jobs in Cook County. Top employment sectors include education and health services; other services; professional, scientific, and management services; and retail trade (LEHD 2021). Between 2010 and 2021, the three fastest-growing major industries by employment were local logistical services (61% growth), information technology (59%), and business services (52%) (Lightcast 2010-2021). Overall, the county has an unemployment rate of 4.4%, similar to the Illinois average of 4.5%. While unemployment has been declining since 2020, it remains above the 3.9% pre-pandemic rate. The county lost approximately 220,000 jobs during the COVID-19 pandemic, 77% of which were recovered as of 2023 (U.S. Bureau of Labor Statistics).

There are existing disparities in employment and wages tied to educational attainment. Unemployment is highest for those with only a high school diploma or some college, and lowest for those with a Bachelor's degree or higher. Similarly, labor force participation is highest for those with a Bachelor's degree, at 76%, and lowest for those with less than a high school diploma, at 53% (ACS 2017-2021 5-Year Estimates PUMS, Suburban Cook County). Median annual earnings increase with higher levels of education: earnings for

those with a graduate or professional degree are almost three times higher than earning for those with less than a high school diploma (ACS 2018-2022 5-Year Estimates, Cook County).

Business Activity

Business by Sector	Number of Workers	Number of Jobs	Share of Workers %	Share of Jobs %	Jobs less workers %
Agriculture, mining, oil & gas extraction	9,971	8,866	0.5%	0.4%	-0.1%
Arts, entertainment, and accommodations	184,458	201,581	8.4%	8.1%	-0.2%
Construction	61,982	69,205	2.8%	2.8%	0.0%
Education and health care services	545,490	608,147	24.7%	24.6%	-0.2%
Finance, insurance, and real estate	170,812	213,249	7.7%	8.6%	0.9%
Information	49,101	60,479	2.2%	2.4%	0.2%
Manufacturing	171,002	178,199	7.8%	7.2%	-0.6%
Other services	252,663	286,819	11.5%	11.6%	0.1%
Professional, scientific, and management services	240,822	284,358	10.9%	11.5%	0.6%
Public administration	78,122	79,195	3.5%	3.2%	-0.3%
Retail trade	216,080	236,879	9.8%	9.6%	-0.2%
Transportation and warehousing	124,395	142,739	5.6%	5.8%	0.1%
Wholesale trade	99,445	104,276	4.5%	4.2%	-0.3%
Total	2,204,343	2,473,992	-	-	-

Table 14 - Business Activity

Data Source: 2021 LEHD (Cook County)

Labor Force

Total population in the civilian labor force	2,651,912
Civilian employed population ages 16 years and over	2,534,647
Unemployment rate	4.4%
Unemployment rate for ages 16-24	6.5%
Unemployment rate for ages 25-64	4.6%

Table 15 - Labor Force

Data Source: BLS 2023, Esri Business Analyst 2024 (Cook County)

Occupations by Sector

	Number of People
Management, business and financial	118,877
Farming, fisheries and forestry occupations	2,358
Service	546,307
Sales and office	193,284
Construction, extraction, maintenance and repair	67,387
Production, transportation and material moving	266,551

Table 16 – Occupations by Sector

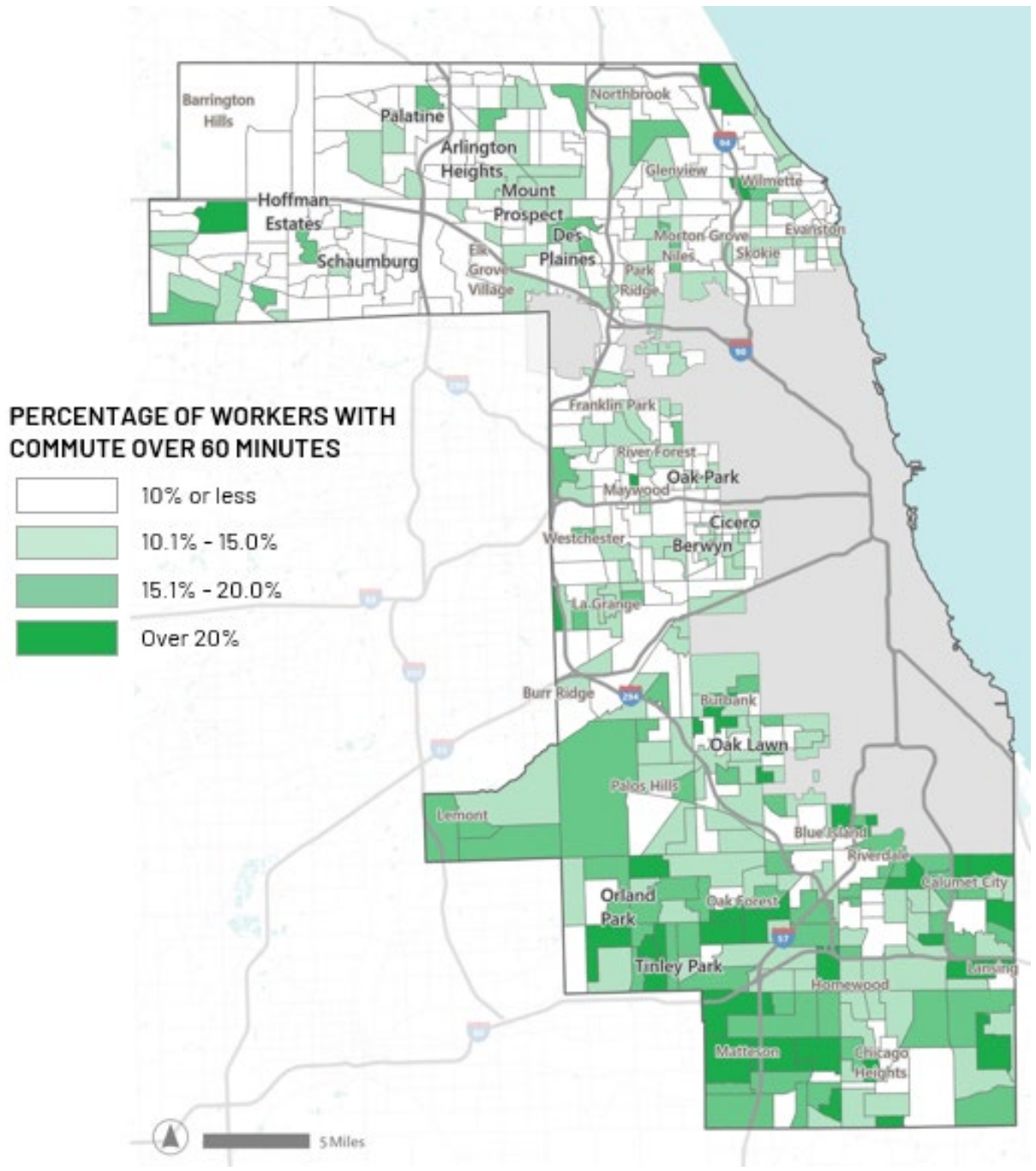
Data Source: ACS 2018-2022 5-Year Estimates (Suburban Cook County)

Travel Time

Travel Time	Number	Percentage
< 30 Minutes	530,305	51%
30-59 Minutes	386,958	37%
60 or More Minutes	127,638	12%
Total	1,044,901	100%

Table 17 - Travel Time

Data Source: ACS 2018-2022 5-Year Estimates (Suburban Cook County)



Source: ACS 5-Year Estimates (2018-2022)

Education:

Educational Attainment by Employment Status (Population 16 and Older)

Educational Attainment	In Labor Force		Not in Labor Force
	Civilian Employed	Unemployed	
Less than high school graduate	39,726	1,906	37,481
High school graduate (includes equivalency)	111,345	7,128	80,300
Some college or Associate's degree	175,144	9,410	84,734
Bachelor's degree or higher	301,889	9,344	100,085

Table 18 - Educational Attainment by Employment Status

Data Source: ACS 5-Year Estimates (2017-2021) PUMS (Suburban Cook County)

Educational Attainment by Age

	Age				
	18–24 yrs	25–34 yrs	35–44 yrs	45–65 yrs	65+ yrs
Less than 9th grade	2,402	7,375	16,507	38,268	30,329
9th to 12th grade, no diploma	20,333	11,408	15,237	32,051	22,788
High school graduate, GED, or alternative	64,594	62,201	65,604	153,679	117,303
Some college, no degree	69,603	61,461	56,329	125,211	86,477
Associate's degree	10,589	28,504	27,694	52,945	25,587
Bachelor's degree	26,912	86,671	83,976	154,552	82,263
Graduate or professional degree	1,971	39,467	65,688	111,037	68,036

Table 19 - Educational Attainment by Age

Data Source: ACS 5-Year Estimates (2018-2022) (Suburban Cook County)

Educational Attainment – Median Earnings in the Past 12 Months

Educational Attainment	Median Earnings in the Past 12 Months
Less than high school graduate	\$31,679
High school graduate (includes equivalency)	\$36,265
Some college or Associate's degree	\$43,288
Bachelor's degree	\$70,414
Graduate or professional degree	\$89,538

Table 20 – Median Earnings in the Past 12 Months

Data Source: ACS 5-Year Estimates (2018-2022) (Cook County)

Based on the Business Activity table above, what are the major employment sectors within your jurisdiction?

The county’s economy is diverse, with no single sector accounting for more than 16% of GRP or 14% of jobs. Based on the Business Activity table, top sectors include education and health services; other services; professional, scientific, and management services; and retail trade (LEHD 2021).

The County and region are coordinated in efforts to support key industries that leverage regional strengths and are poised for growth. As identified by GCEP, these industries are (1) manufacturing, (2) business and professional services, (3) finance and insurance, (4) TD&L, (5) food manufacturing and innovation, and (6) life sciences. Overall, the key industries represent more than 820,000 jobs in Cook County as of 2024, or approximately one third of all employment (Lightcast).

Between 2010-2024, employment increased across most key industries, led by business and professional services (+59,300 jobs) and TD&L (+43,200 jobs). While manufacturing employment has declined by 10% since 2010, the manufacturing sector remains a significant component of the regional employment base and regional focus, with 173,900 jobs as of 2024. A strong transportation network, logistics infrastructure, connections to domestic and local supply chains, and an experienced workforce give the county a key competitive advantage in manufacturing reshoring. Manufacturing clusters with strong employment include automotive industries, metalworking technology, and upstream metal manufacturing. Food manufacturing industries have experienced strong employment growth, increasing from 34,500 jobs in 2010 to 42,400 jobs in 2024 (+23%).

Describe the workforce and infrastructure needs of the business community:

Access to a skilled workforce is crucial to support business development. Recent County and partner initiatives have focused on upskilling workers in key industries and strengthening partnerships between employers, workforce service providers, and job seekers. Good Jobs Chicagoland is an employer-led, community-centered program that creates talent pipelines up to mid-level jobs, with a focus on supporting unemployed and underemployed residents of communities facing a range of challenges. The program leverages proven employer partnerships in manufacturing, TD&L, healthcare, and information technology. To address challenges in hiring and retaining talent, the Cook County Manufacturing Apprenticeship Accelerator offers a concierge service to manufacturers, identifying and screening candidates for employment and apprenticeships, and providing supportive services after the individuals are hired.

Strong regional transportation infrastructure and availability of affordable housing are essential to support Cook County’s over 2.5 million workers and 650,000 businesses. While Cook County remains more affordable than other similarly sized metro areas, housing costs are rising. Between 2015 and 2024, the median single-family home sale price increased by an average of 75% or \$137,000 across Suburban Cook County, while average market-rate multifamily rents increased by 34% or \$430/month (CoStar, MLS). Lack of affordable housing may force households to move further from job centers, increasing commute times, straining road infrastructure and limiting the pool of available workers. Approximately 17% of Cook

County residents use public transportation to commute to work, compared to 8% statewide and just 4% nationally (2018-2022 ACS 5-Year Estimates). Increasing the frequency and extent of public transit supports job access while reducing pressures on congested roads and highways. Highway maintenance and capital improvements are necessary to support freight and distribution networks that facilitate the flow of labor and goods throughout the region and country. Addressing the transportation project backlog, updating aging infrastructure, and increasing infrastructure resilience to flooding are core priorities.

Describe any major changes that may have an economic impact, such as planned local or regional public or private sector investments or initiatives that have affected or may affect job and business growth opportunities during the planning period. Describe any needs for workforce development, business support or infrastructure these changes may create.

As mentioned above, GCEP aims to foster unified and inclusive regional economic development. GCEP conducts research, identifies priority industries, pursues regional business development, acts as a convener, and promotes the economic assets of the Chicago region. GCEP has been instrumental in solidifying and expanding partnerships between the business community and public sector while presenting a clear, coordinated vision for regional economic development.

Cook County is part of one of the most diverse manufacturing ecosystems in the U.S. and is well-positioned to expand to support manufacturing onshoring efforts. The county is consistently ranked as one of the top 10 national destinations for manufacturing across 16 of the 21 manufacturing subsectors (GCEP). Key competitive advantages include a strong transportation network, logistics infrastructure, connections to domestic and local supply chains, and an experienced workforce. Historic statewide investments in new energy technologies are poised to drive positive economic impact and growth in a range of economic sectors. In 2021, Illinois passed the Climate and Equitable Jobs Act (CEJA), mandating a transition to 50% clean energy by 2040 and 100% by 2050. State investments under CEJA are aimed at energy procurement, business development and workforce readiness, including the development of workforce hubs, pre-apprenticeship programs, retraining programs for workers impacted by the energy transition, business incubators, and grants to fund new energy technology projects that support businesses, community organizations and residents. The County is in the process of establishing the Chicagoland Solar Collaborative, an industry-sector partnership to improve on-ramps for businesses and individuals seeking access to employment and entrepreneurship opportunities related to solar energy.

Major upcoming investments in the nation's first utility-scale quantum computing campus on Chicago's South Side will also have a far-reaching economic ripple effect, boosting energy technology, advanced manufacturing, engineering, and other related industries. The Chicago region is already a leader in quantum technologies and research, and development of the Illinois Quantum and Microelectronics Park will cement the region's status as a global hub for quantum computing. Overall, the campus is expected to create thousands of jobs and generate up to \$60 billion in economic impact (Chicago Quantum Exchange).

How do the skills and education of the current workforce correspond to employment opportunities in the jurisdiction?

The Cook County economy benefits from the strong presence of higher education and research institutions, technical training programs, and accelerators/incubators that spur innovation and build strong workforce pipelines to core and emerging industries. There are over 500 post-secondary programs approved by the Illinois Board of Education within the region, including programs at several of the world's top research institutions like the University of Chicago, Northwestern University, and the University of Illinois system (GCEP). Across Suburban Cook County, 40% of residents ages 25 and over have a Bachelor's degree or higher, 8% have an Associate's degree, and 23% have a high school diploma or equivalent (ACS 2018-2022 5-Year Estimates).

Education requirements vary across high-growth occupations in Cook County. Of the top ten occupations by total 2010-2024 job growth, five require a Bachelor's degree (general and operations managers; market research analysts and marketing specialists; financial managers; software developers; and registered nurses), four require a high school diploma only (home health and personal care aides; sales representatives of services, except advertising, insurance, financial services, and travel; stockers and order fillers; and secretaries and administrative assistants, except legal, medical, and executive), and one does not require formal education (laborers and freight, stock, and material movers, hand). Occupations requiring a Bachelor's degree average higher wages than those requiring only a high school diploma. Median annual earnings ranged from \$79,000-164,000 for occupations requiring a Bachelor's degree and \$34,000-65,000 for those requiring a high school diploma. Collectively, these high-growth occupations accounted for about 80% of the county's net job growth since 2010, demonstrating their strong impact within the labor market (Lightcast).

Disparities in educational attainment by race prevent many county residents from accessing higher-wage jobs. Across Suburban Cook County, 66% of Asian residents and 43% of White residents have a Bachelor's degree or higher, compared to 27% of Black residents and 16% of Hispanic residents (2018-2022 ACS 5-Year Estimates). Increasing access to higher education — including advanced apprenticeships and trade programs in key industries — is essential to prepare the county workforce for the future.

Describe any current workforce training initiatives, including those supported by Workforce Investment Boards, community colleges and other organizations. Describe how these efforts will support the jurisdiction's Consolidated Plan.

The Chicago Cook Workforce Partnership (the "Partnership") is an umbrella organization operating the public workforce system in Chicago and Cook County. As the largest nonprofit workforce development system in the nation, the Partnership has helped place more than 60,000 individuals in employment, collaborated with more than 2,000 employers, and administered millions of dollars in federal and philanthropic funds. The Partnership's network of more than 50 community-based organizations, 10 American Job Centers, and sector-driven workforce centers provide services to the county's 132 municipalities. In the 2022-2023 program year, the Partnership placed 600 individuals into registered apprenticeships and created 2,100 individual training accounts, investing more than \$16 million in

training. The Partnership’s programs also targeted key regional industries in 2022 and 2023, including 600 positions filled in the TD&L sector and 300 positions filled in the manufacturing sector.

Strategies outlined in the draft Con Plan align with the priorities of the 2024-2027 Local Workforce Innovation Area (LWIA) 7 Local Plan prepared by the Partnership. These priorities include supporting employment-driven regional sector initiatives, providing economic advancement for all populations through career pathways, expanding service integration, and ensuring youth and other underserved populations who face barriers to employment can achieve and maintain stable employment.

Does your jurisdiction participate in a Comprehensive Economic Development Strategy (CEDs)?

Yes. Uplift Cook is the overarching planning process for both the 2025-2029 Con Plan and Comprehensive Economic Development Strategy (CEDs) for Cook County.

If so, what economic development initiatives are you undertaking that may be coordinated with the Consolidated Plan? If not, describe other local/regional plans or initiatives that impact economic growth.

The draft 2025-2029 Con Plan was prepared concurrently with the 2025-2029 CEDs through the Uplift Cook process. The strategies and actions are aligned across the Con Plan and CEDs.

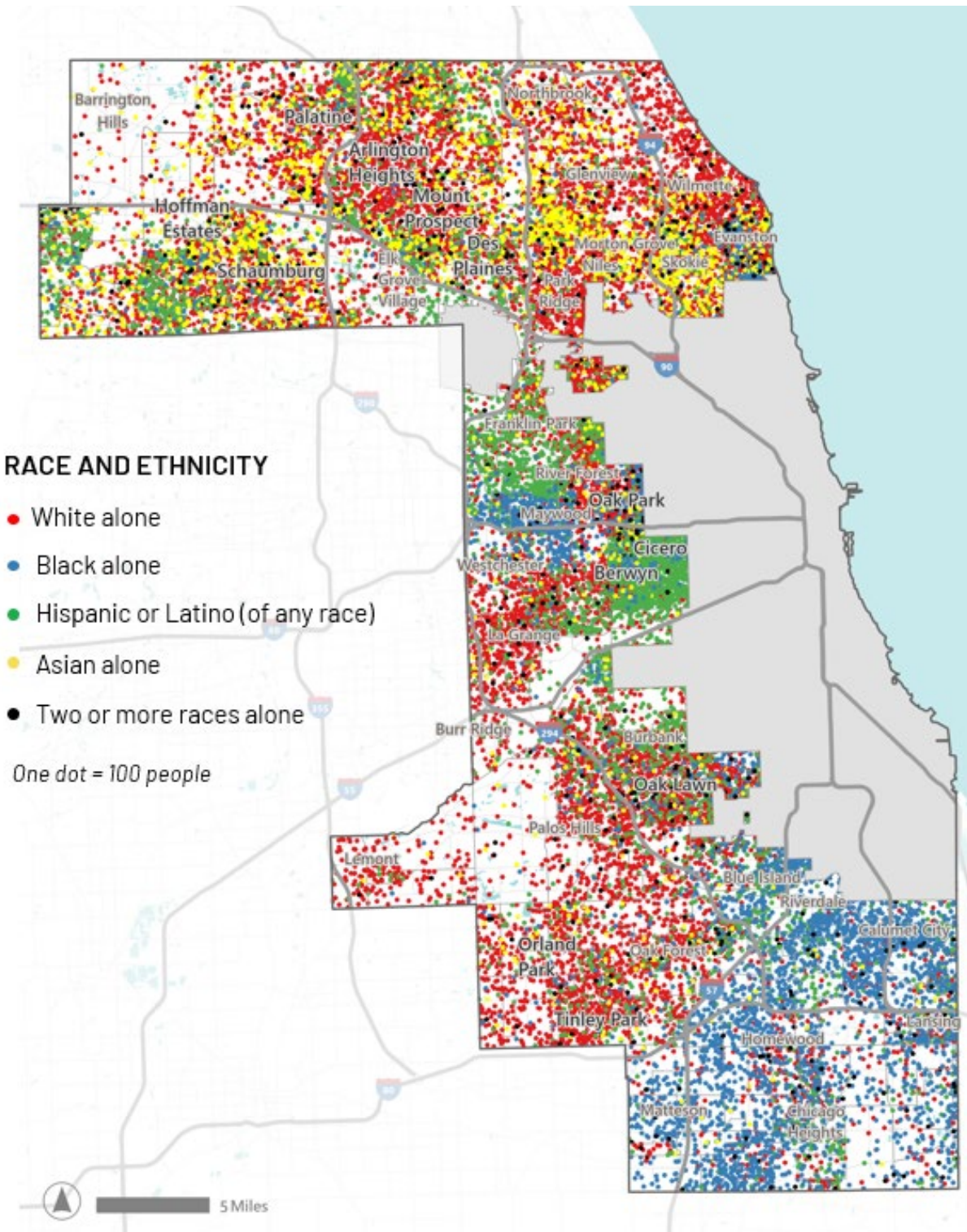
Discussion

The County and its partners have prepared numerous economic development plans and championed related initiatives in recent years. These plans detail the impacts of recent economic shifts and shocks, key opportunities, and strategic priorities for County departments and partner agencies. They include the Cook County Bureau of Economic Development 2024-2027 Strategic Plan, Cook County 2024-2027 Policy Roadmap, Open for Business: Illinois’ Economic Growth Plan (2024), GCEP Chicagoland’s Economic Landscape (2023), CMAP ON TO 2050, CMAP Inclusive Growth Analysis (2022), and others. The economic and workforce development strategies outlined in the draft 2025-2029 Con Plan and CEDs are informed by a synthesis of these prior plans, updated analysis, stakeholder engagement through the Uplift Cook planning process, and discussions with County staff.

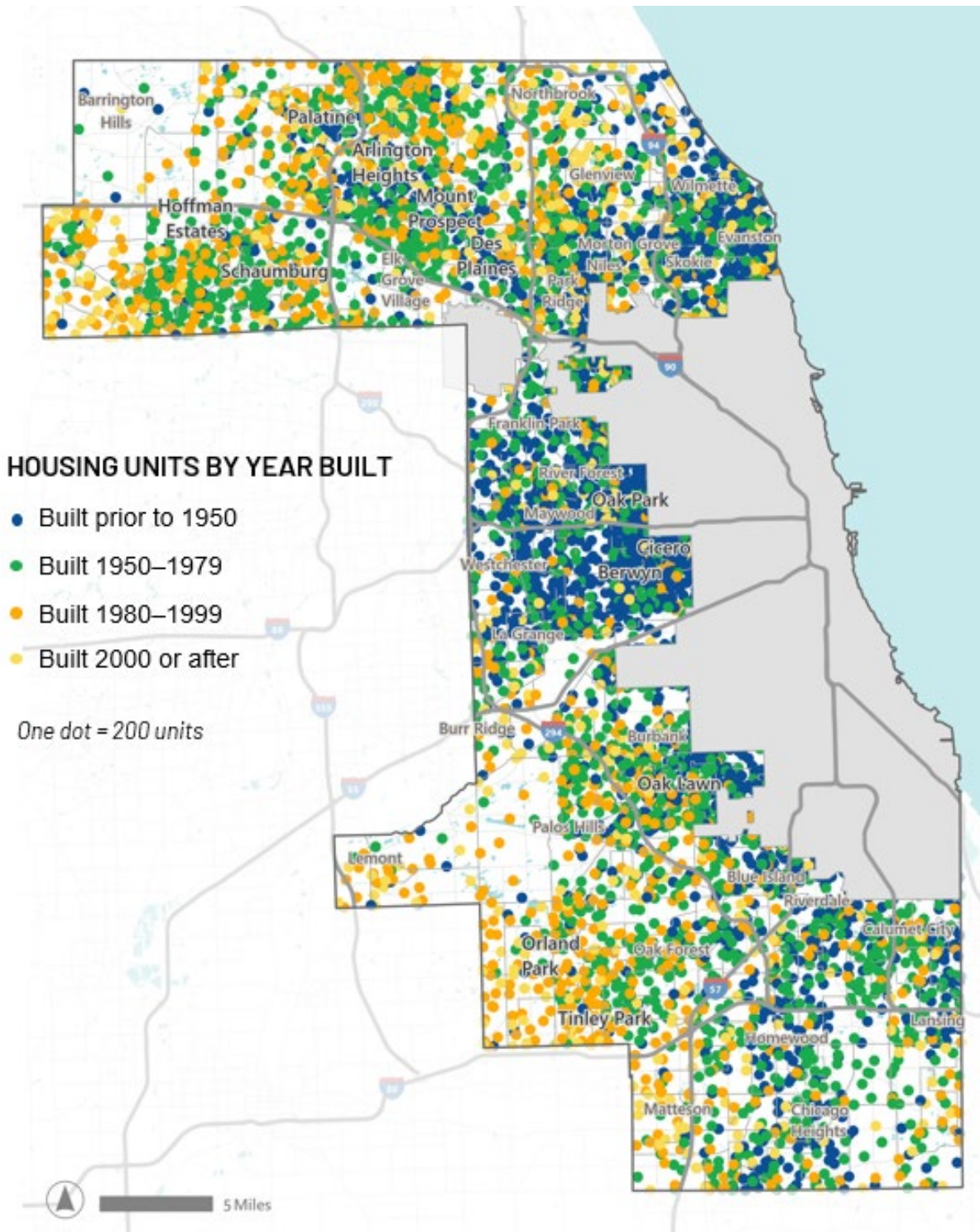
MA-50 Needs and Market Analysis Discussion

Are there areas where households with multiple housing problems are concentrated? (include a definition of "concentration")

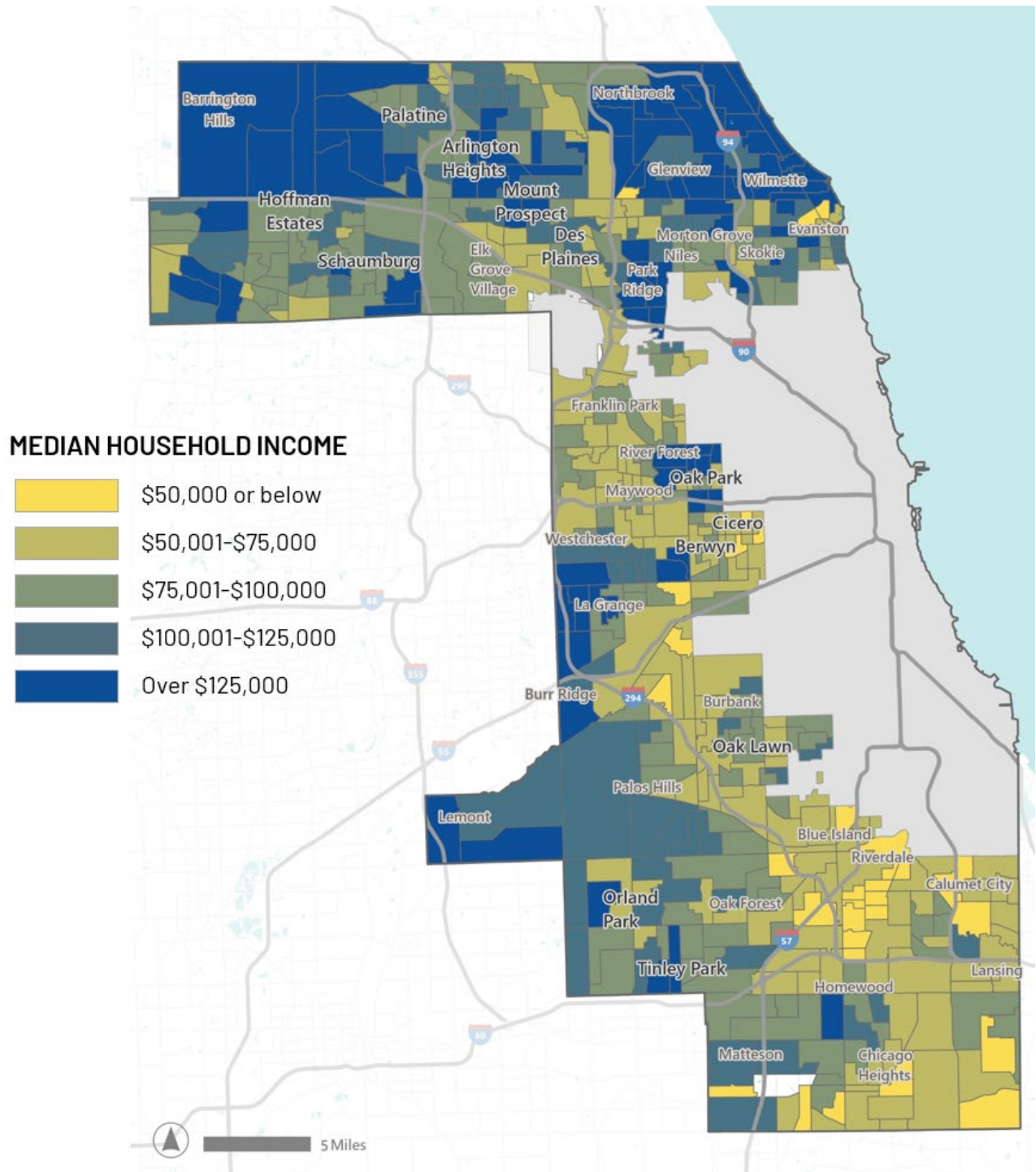
Housing problems include physical conditions related to the age of the housing stock and/or lack of investment, such as lack of complete plumbing or kitchen facilities, as well as market conditions that lead to overcrowding (more than one person per room) and/or cost burden greater than 30%. For the purposes of this assessment, “concentration” is defined as the relative prevalence of certain characteristics within one geographic sub-region (based on aggregate census tracts) as compared to other areas. The prevalence of older housing increases the likelihood of physical housing conditions, while lower-income residents are likely to have fewer resources to conduct essential maintenance and repairs. Communities with high concentrations of both lower-income households and housing built prior to 1980 include west suburban communities, such as Cicero and Maywood, and south suburban communities, such as Blue Island, Harvey, and Chicago Heights. Rates of housing cost burden are also significantly higher for households at lower income levels. Areas with lower incomes, and higher rates of housing cost burden relative to Suburban Cook County overall are prevalent across the south suburbs, including communities like Riverdale, Markham, Phoenix, and others (ACS 2018-2022 5-Year Estimates).



Source: ACS 5-Year Estimates (2018-2022)



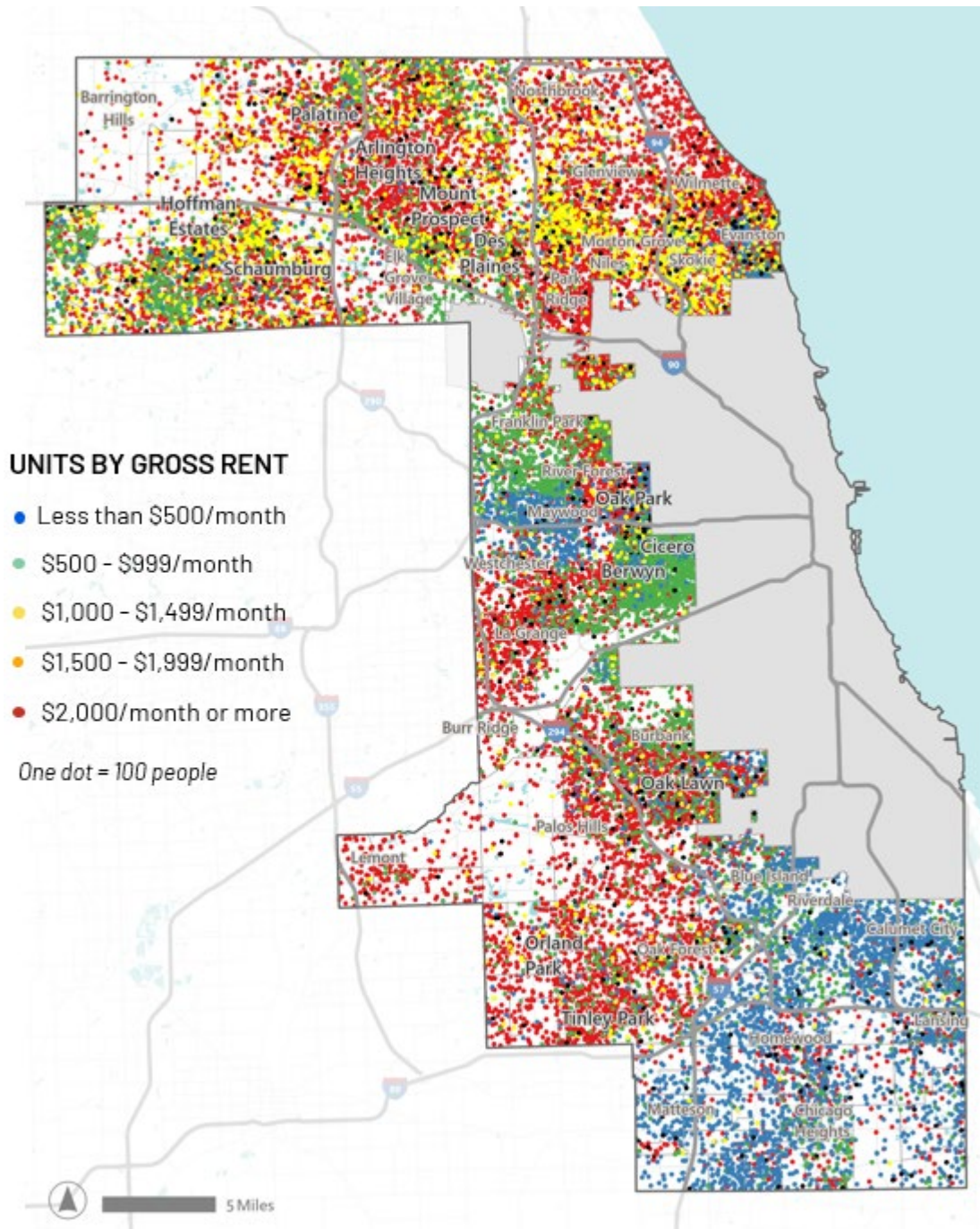
Source: ACS 5-Year Estimates (2018-2022)



Source: ACS 5-Year Estimates (2018-2022)

Are there any areas in the jurisdiction where racial or ethnic minorities or low-income families are concentrated? (include a definition of "concentration")

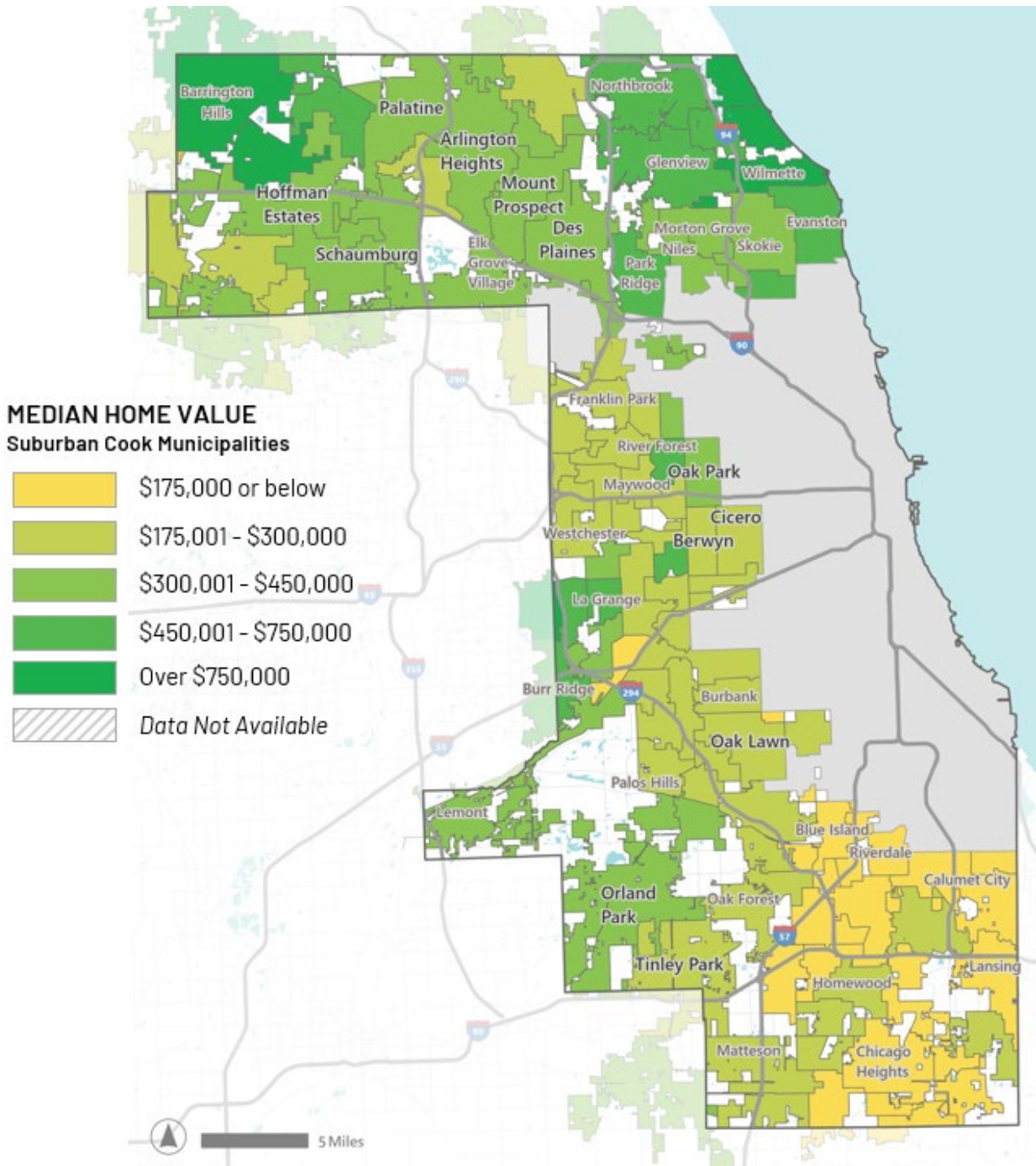
There are many geographic divides along racial, ethnic, and income lines in Suburban Cook County. For the purposes of this assessment, “concentration” is defined as the relative prevalence of certain characteristics within one geographic sub-region (based on aggregate census tracts) as compared to other areas. There is a greater concentration of low-income households in the south and near west parts of the county. Near west suburbs have significant numbers of Hispanic residents, while the south suburbs have high concentrations of Black residents and a growing Hispanic population (U.S. Census 2010-2020). While racial diversity has been increasing in Suburban Cook County, largely driven by increases in Hispanic residents, patterns of geographic segregation have remained largely unchanged (ACS 2018-2022 5-Year Estimates).



Source: ACS 5-Year Estimates (2018-2022)

What are the characteristics of the market in these areas/neighborhoods?

Income varies widely by community and neighborhood in Suburban Cook County. While there is variation in income within sub-regions, there is a greater prevalence of high-income households across much of northern and southwestern Cook County, and a greater prevalence of low-income households across the south and west. These income patterns tend to align with patterns of racial and ethnic concentration. In addition to lower household incomes, south and west suburbs tend to have lower home values and rents than north and southwestern suburbs (ACS 2018-2022 5-Year estimates). These housing indicators reflect limited investment, lower land values, and reduced economic activity.



Source: ACS 5-Year Estimates (2018-2022)

Are there any community assets in these areas/neighborhoods?

The south suburbs have strong freight and logistics assets, a rich history of industry and innovation, and an ecosystem of organizations that are motivated to strengthen the area's economic vitality. The area's rail, airport, and port infrastructure are key assets that can support business development and expansion. The South Suburban Economic Growth Initiative (SSEGI) identified the food manufacturing, metals machinery & equipment (MME), and TD&L sectors as key growth opportunities in the south suburbs that leverage the area's assets. Furthermore, a strong network of partner organizations in the south suburbs is focused on increasing investment and promoting coordinated economic development in the sub-region.

Are there other strategic opportunities in any of these areas?

There are many organizations that focus on promoting economic development and increasing investment and economic opportunity in the south suburbs, including the South Suburban Mayors and Managers Association (SSMMA), Southland Development Authority, Chicago Southland Chamber of Commerce, South Suburban Land Bank and Development Authority, and Chicago Southland Economic Development Corporation. These organizations were instrumental in the recent passage of the Southland Reactivation Act, a state law which provides a tax abatement incentive to property developers who purchase and redevelop tax-exempt commercial or industrial property within specific south suburban townships. This incentive helps promote redevelopment and investment in areas with limited historic investment and access to economic opportunity. SSEGI is an intentional effort by the County, the Southland Development Authority, and other partner organizations to achieve transformative economic development in the south suburbs, including growing emerging industries, investing in workforce development, supporting business development, and investing in housing. SSEGI leverages the south suburbs' key assets in the food manufacturing, MME, and TD&L sectors.

MA-60 Broadband Needs of Housing occupied by Low- and Moderate-Income Households - 91.210(a)(4), 91.310(a)(2)

Describe the need for broadband wiring and connections for households, including low- and moderate-income households and neighborhoods.

Inadequate broadband internet access impacts Cook County's residents, businesses, and communities. While broadband infrastructure necessary for at-home connectivity is largely in place across Suburban Cook County, there continue to be new and developing areas requiring additional infrastructure. As outlined in the 2023 Cook County Digital Equity Plan, half of survey respondents noted that poor internet connectivity — characterized by slow speeds, unreliable connections, or lack of bandwidth to support multiple users in a household — keeps them from doing what they want online, which may include working, attending school, accessing social services or socializing. About 60% of households have inadequate internet: 27% lack home wireline internet service, 11% rely on a cellular data plan to connect to the internet, and 21% do not have a computer at all. Areas of Suburban Cook County with the lowest

rates of subscription to home internet services include the south and west suburbs. Lack of reliable internet access can compound education, employment, and workforce challenges. Additional investment in digital infrastructure is needed to ensure countywide access to the internet for the benefit of residents, businesses, and communities.

In 2024, Cook County acquired the Chicago Southland Fiber Network to expand high-speed internet fiber and services to south suburban residents and institutions that have been underserved and to leverage and expand the existing fiber network already present within the south suburbs beyond its existing footprint. The County's focus has been on accelerating investment of digital infrastructure, fostering greater digital proficiency, and improving digital access within the south suburbs. Connectivity and some degree of internet literacy is often a requirement to access education or employment opportunities. Community engagement from the Digital Equity Plan noted that digital connectivity in Suburban Cook County faces challenges beyond physical infrastructure, including the cost of service, access to a computer in homes, and internet safety. Programs like Comcast's Internet Essentials allow low-income residents to get internet access at low rates or purchase refurbished technology at discounted rates. Comcast also provides support for nonprofits offering digital literacy classes to increase the accessibility of services available to those with internet access, including education and workforce development.

Comcast supports a number of "Lift Zones" in Suburban Cook County that provide free public Wi-Fi access points for residents who may not have connection at home. Increased communication between broadband service providers and municipal partners can help to identify remaining gaps in service coverage and planned new developments to coordinate investment where it is most needed.

Describe the need for increased competition by having more than one broadband Internet service provider serve the jurisdiction.

Broadband access is likely to improve the overall quality of life and access to opportunities for residents lacking strong and stable internet access in Cook County. Lift Zones that provide free public Wi-Fi is one step toward improving internet access in certain areas, but cannot replace the benefits of affordable home internet access. Increased competition via multiple broadband providers may decrease prices for consumers. Multiple providers covering the same area may also result in upgrades to broadband infrastructure, with providers offering multiple service plan options at varying price points for residents.

MA-65 Hazard Mitigation - 91.210(a)(5), 91.310(a)(3)

Describe the jurisdiction’s increased natural hazard risks associated with climate change.

The primary natural hazard challenges in Suburban Cook County are related to extreme heat, extreme cold, and impacts from severe storms, including flooding and damage from high winds or tornadoes. Flooding is a particular risk across Cook County, with most of the county ranked as at least an 8 out of 10, or “extreme risk,” as defined in CMAP’s urban flood susceptibility index. After more than a decade with no major disasters, three major disaster declarations were made in Cook County in 2023 and 2024. Damage from these events was primarily related to torrential rains across large portions of the county, which caused flooding of streets, basements, and ground-floor residential units, and resulted in sewer backup into homes. High winds and tornado damage also affected large swaths of the county. DPD is in the process of identifying how to allocate CDBG-DR funding in the coming years to address the past and future impacts of disaster declarations and other natural hazards.

Describe the vulnerability to these risks of housing occupied by low- and moderate-income households based on an analysis of data, findings, and methods.

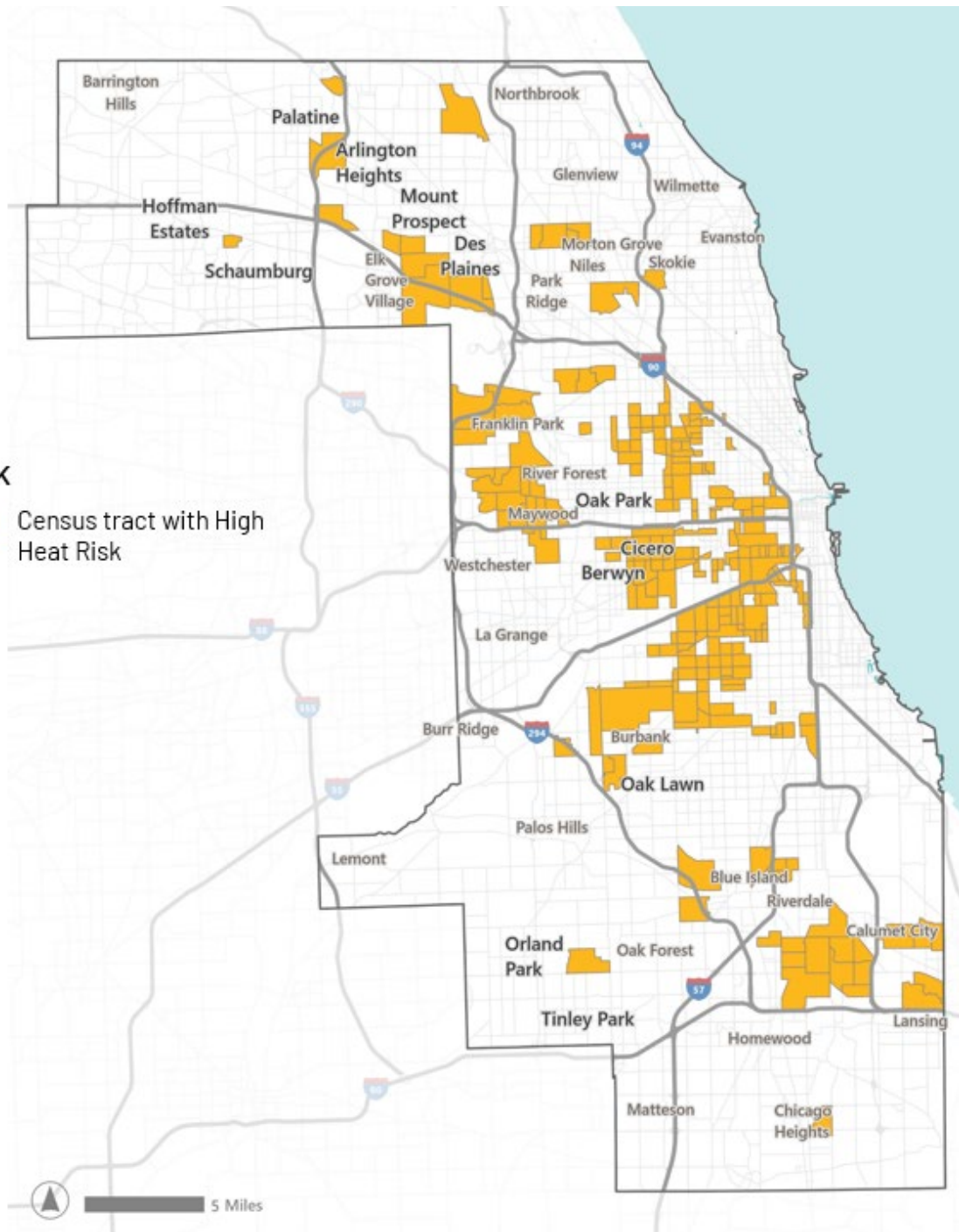
While extreme heat generally affects the entire county, the combination of reduced tree canopy and high amounts of impervious surfaces creates a heat island effect, further exacerbating high temperatures in some areas. These areas, determined to be at “heat risk” by the Cook County Greenprint (a climate vulnerability tool published by The Nature Conservancy in Illinois), show significant overlap with lower-income areas of the county, which may have fewer resources to address impacts. Lower-income households may also have less ability to respond to higher utility bills, maintenance costs, and costs of adding trees and landscaping to mitigate the impacts.

Though nearly the entire county is susceptible to flooding and storm damage, households at lower incomes may have less financial power to prepare prior to a flood or wind event, or to make repairs in its aftermath. Communities with a high share of lower-income households may also lack the financial resources to prepare or respond to these events or to implement flood mitigation initiatives resulting in a higher degree of vulnerability to the impacts of natural hazards for lower-income communities. Additionally, the county has experienced more frequent and severe 100-year flood and federally declared disaster events in recent years, underscoring the need for investments to prepare for and mitigate the impacts of these more frequent events.

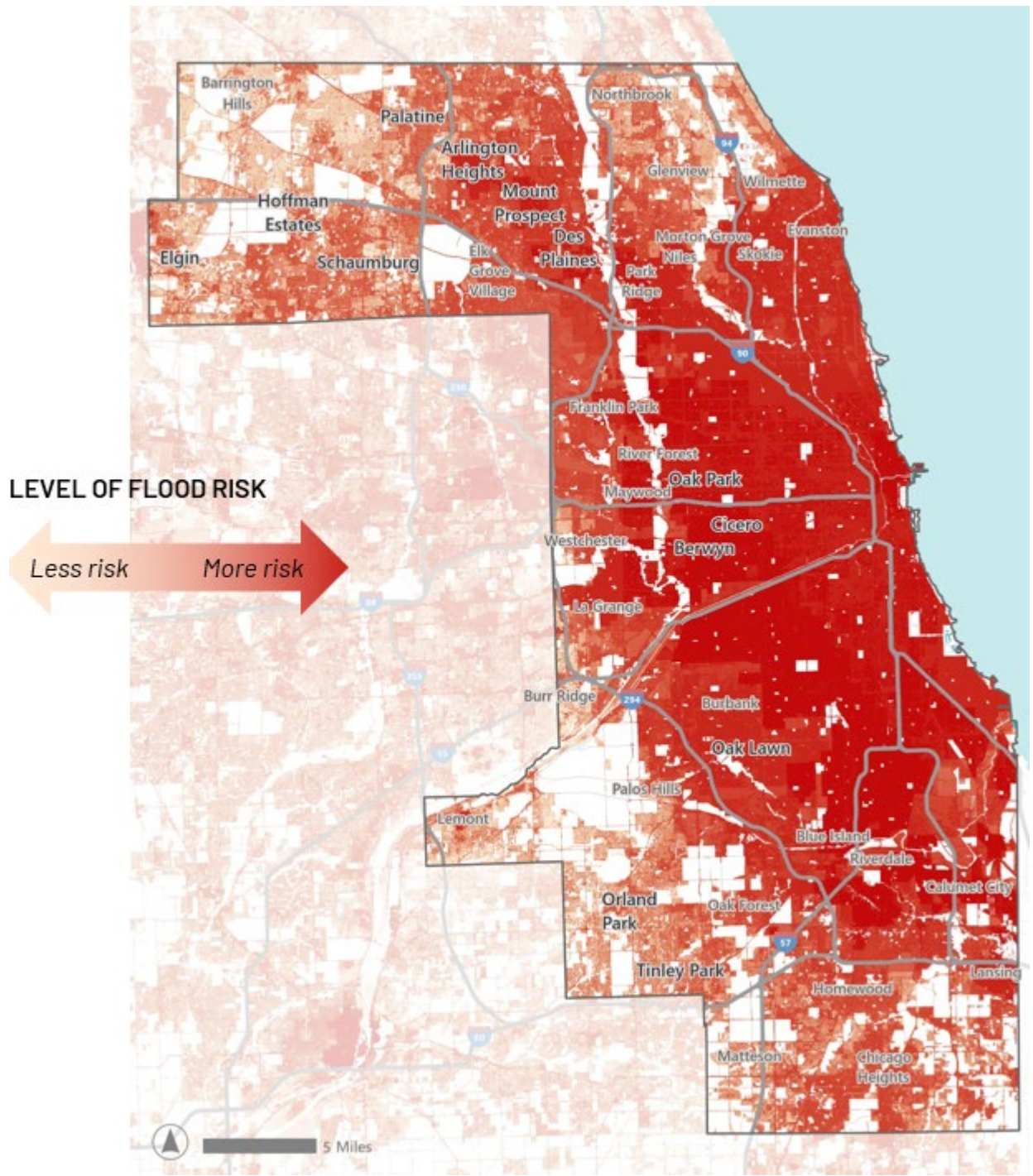
HEAT RISK



Census tract with High Heat Risk



Source: Cook County Greenprint



Source: CMAP

Strategic Plan (SP)

SP-05 Overview

Strategic Plan Overview

The strategies outlined in the draft 2025-2029 Consolidated Plan (Con Plan) align with and build off the County's 2024-2027 Policy Roadmap, which defines the broad strategic plan for Cook County Offices Under the President, and the 2024-2027 Cook County Bureau of Economic Development (BED) Strategic Plan, which provides specific strategies that BED will undertake to further the objectives set forth in the Policy Roadmap. Where applicable, those strategies were expanded and supplemented by data analysis; a strengths, weaknesses, opportunities and threats (SWOT) analysis; focus group and steering committee feedback; interviews; public comment; and a review of additional County, state, and regional plans.

The Con Plan strategies are organized into five goal topic areas: (1) housing and homelessness, (2) community development, (3) economic development, (4) workforce development, and (5) infrastructure. Each topic area contains a policy statement that outlines the vision for that topic followed by specific strategies to achieve that vision and metrics for success. These topic areas and strategies also align with the County's 2025-2029 Comprehensive Economic Development Strategy (CEDS).

SP-10 Geographic Priorities – 91.215 (a)(1)

Geographic Area

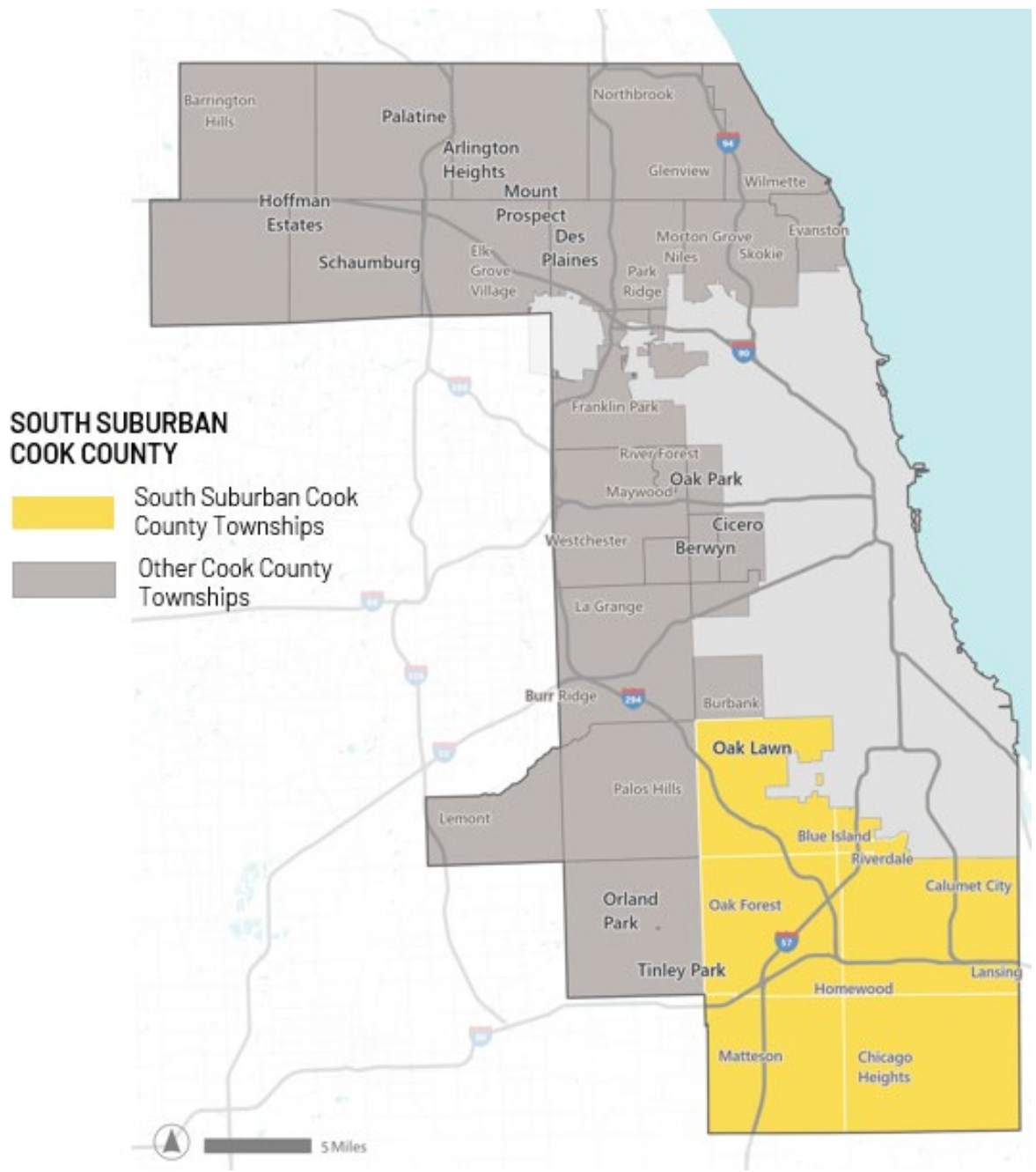
Target Area Name:	South Suburban Cook County
Target Area Type:	Local target area
Other Target Area Description:	[intentionally left blank]
Revital Type:	Comprehensive
Other Revital Description	[intentionally left blank]
Identify the neighborhood boundaries for this target area.	Bremen, Bloom, Calumet, Rich, Thornton, and Worth townships
Include specific housing and commercial characteristics of this target area.	Portions of South Suburban Cook County are characterized by lower property and home values, limited commercial investment, and aging infrastructure and housing stock. Declining population, lower household incomes, and higher unemployment have followed. Rapidly rising property values after the most recent reassessment have increased costs significantly for existing homeowners, placing financial pressures on low- and fixed-income households.
How did your consultation and citizen participation process help you to identify this neighborhood as a target area?	This area was identified based on feedback from steering committee members, focus group participants, BED staff, and housing and service providers interviewed during the Con Plan process.
Identify the needs in this target area.	Target needs include affordable housing development, housing preservation and rehabilitation, permanent supportive housing, rehabilitation or construction of public facilities, expanded health and workforce development services, and infrastructure investments that expand access to jobs, address flooding and age-related challenges, and promote commercial revitalization.
What are the opportunities for improvement in this target area?	To stimulate economic growth and address core housing needs, there are opportunities for investments in residential construction and preservation, economic development, infrastructure, workforce development, and public services.
Are there barriers to improvement in this target area?	Barriers to improvement include limited, and in some cases, declining tax bases, aging housing and low home values, significant infrastructure needs to promote growth and investment, and limited and declining funding relative to service needs. These barriers challenge the development of market-rate housing, since low values and market rents cannot support the cost of new construction. Furthermore, developer perception and stigma around the challenges of the south suburbs limit growth even where development is viable.

Target Area Name:	West Suburban Cook County
Target Area Type:	Local target area
Other Target Area Description:	[intentionally left blank]
Revital Type:	Comprehensive
Other Revital Description	[intentionally left blank]
Identify the neighborhood boundaries for this target area.	Berwyn, Cicero, Leyden, Lyons, Norwood Park, Oak Park, Proviso, Riverside, River Forest, and Stickney townships
Include specific housing and commercial characteristics of this target area.	Older homes built prior to 1950 are concentrated in the inner-ring western suburbs of Chicago. Inner-ring suburbs also tend to be more densely populated than other areas, with a prevalence of 2–4-unit buildings and some larger buildings. Rents and home values are generally moderate compared to the county overall; however, some west suburban municipalities have experienced rapidly increasing home values in recent years.
How did your consultation and citizen participation process help you to identify this neighborhood as a target area?	This area was identified based on feedback from steering committee members, focus group participants, BED staff, and housing and service providers interviewed as part of the Con Plan process.
Identify the needs in this target area.	West suburban communities have high rates of housing cost burden, particularly municipalities with lower median incomes. Rehabilitation of the existing older housing stock is key to addressing age-related conditions, hazardous or otherwise.
What are the opportunities for improvement in this target area?	To stimulate economic growth and address core housing needs, there are opportunities for investments in residential construction, preservation of existing older housing stock (including naturally occurring affordable housing), economic development, infrastructure, workforce development, and public services. Increasing home values indicate market demand but may lead to displacement if existing residents cannot absorb increased housing costs. There are opportunities to strengthen economic and workforce development and provide services that help increase access to jobs and mitigate the impact of housing cost increases for low- and moderate-income residents.

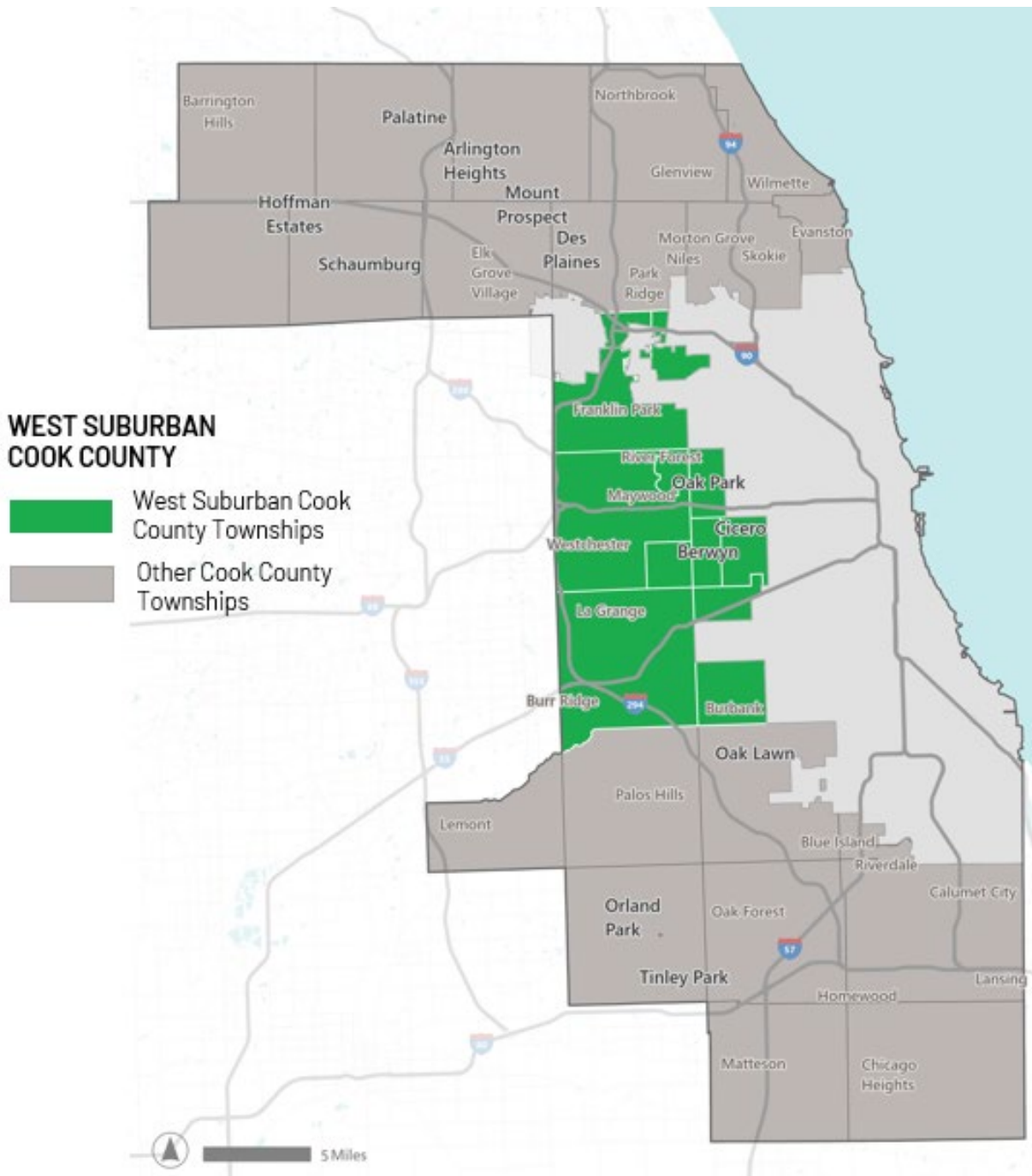
Target Area Name:	Suburban Cook County
Target Area Type:	Local target area
Other Target Area Description:	[intentionally left blank]
Revital Type:	Comprehensive
Other Revital Description	[intentionally left blank]
Identify the neighborhood boundaries for this target area.	Cook County, except for Chicago
Include specific housing and commercial characteristics of this target area.	Housing and commercial characteristics vary across Suburban Cook County.
How did your consultation and citizen participation process help you to identify this neighborhood as a target area?	DPD's overarching jurisdiction is Suburban Cook County.
Identify the needs in this target area.	Needs relevant to Suburban Cook County overall include transportation infrastructure, public services, affordable housing development, preservation of existing housing, workforce development, and economic development.
What are the opportunities for improvement in this target area?	Opportunities vary across Suburban Cook County.

Target Area Name:	CDBG Priority Area
Target Area Type:	Local target area
Other Target Area Description:	[intentionally left blank]
Revital Type:	Comprehensive
Other Revital Description	[intentionally left blank]
Identify the neighborhood boundaries for this target area.	Cook County, except for Arlington Heights, Berwyn, Chicago, Cicero, Des Plaines, Elgin, Evanston, Hoffman Estates, Mount Prospect, Oak Park, Palatine, Schaumburg, and Skokie
Include specific housing and commercial characteristics of this target area.	Housing and commercial characteristics vary across the CDBG Priority Area.
How did your consultation and citizen participation process help you to identify this neighborhood as a target area?	This geography encompasses all areas that are eligible to receive CDBG funding through DPD. Municipalities that receive their own CDBG entitlements are excluded.
Identify the needs in this target area.	General needs include transportation infrastructure, public services, affordable housing, housing preservation, workforce development, and economic development. Specific needs vary by community.
What are the opportunities for improvement in this target area?	Opportunities vary across the CDBG Priority Area.

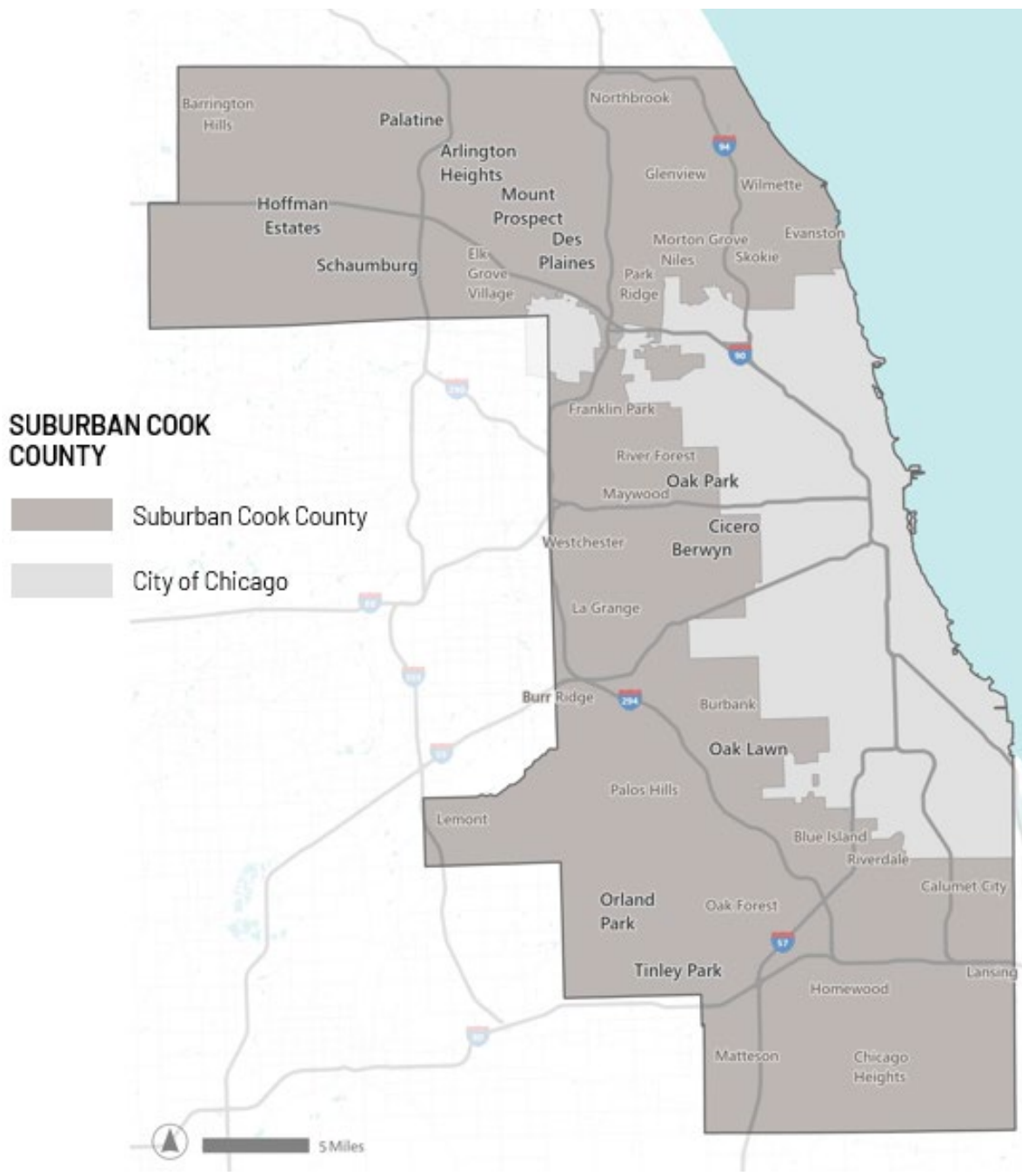
Target Area Name:	HOME Consortium
Target Area Type:	Local target area
Other Target Area Description:	[intentionally left blank]
Revital Type:	Comprehensive
Other Revital Description	[intentionally left blank]
Identify the neighborhood boundaries for this target area.	Cook County, except for Chicago and Evanston
Include specific housing and commercial characteristics of this target area.	Housing and commercial characteristics vary across the HOME Consortium.
How did your consultation and citizen participation process help you to identify this neighborhood as a target area?	This geography encompasses all areas that are eligible to receive HOME funding through DPD. Municipalities that receive their own HOME entitlements are excluded.
Identify the needs in this target area.	General needs include transportation infrastructure, public services, affordable housing, housing preservation, workforce development, and economic development. Specific needs vary by community.
What are the opportunities for improvement in this target area?	Opportunities vary across the HOME Consortium.



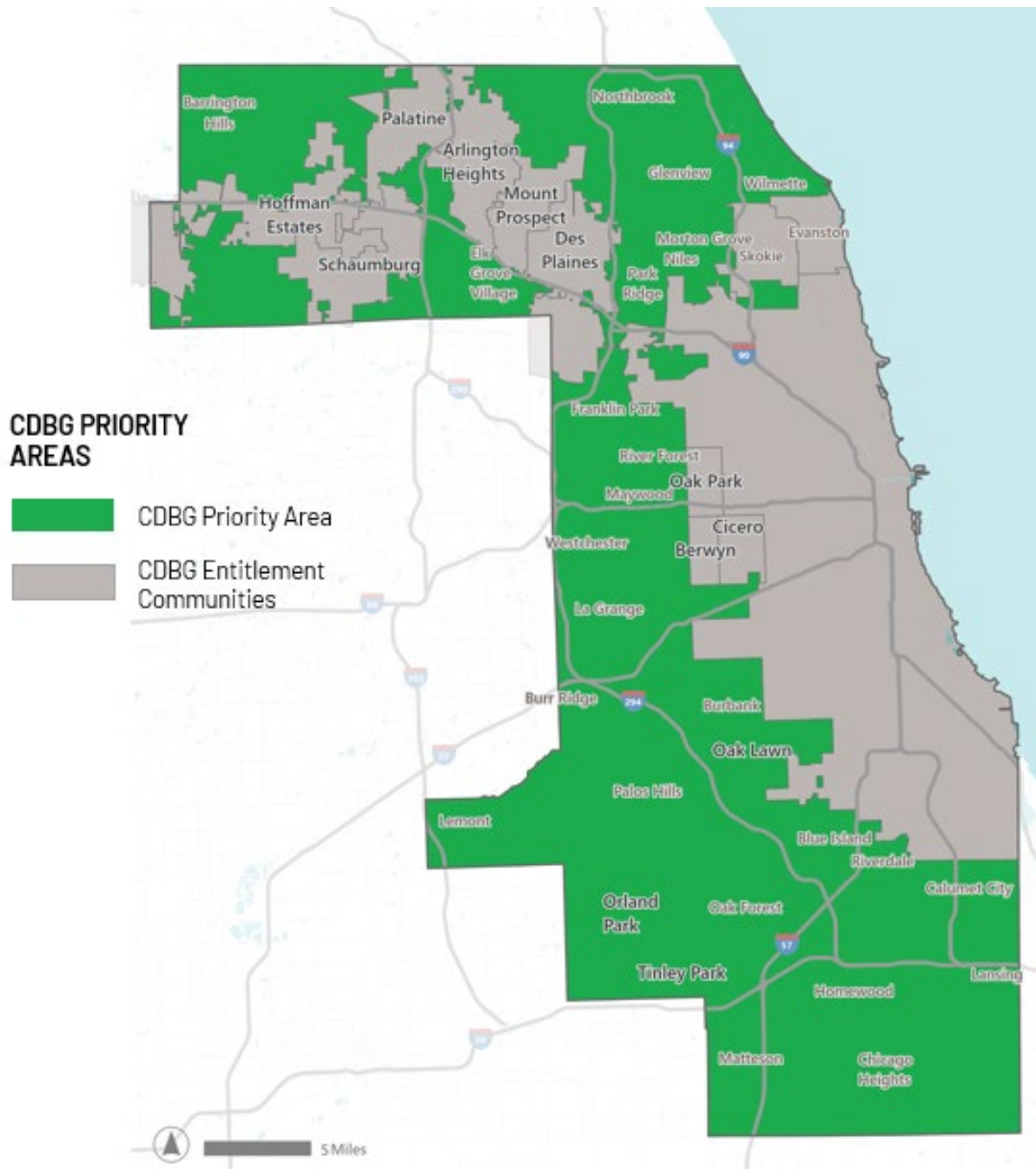
Source: Cook County, Esri, SB Friedman



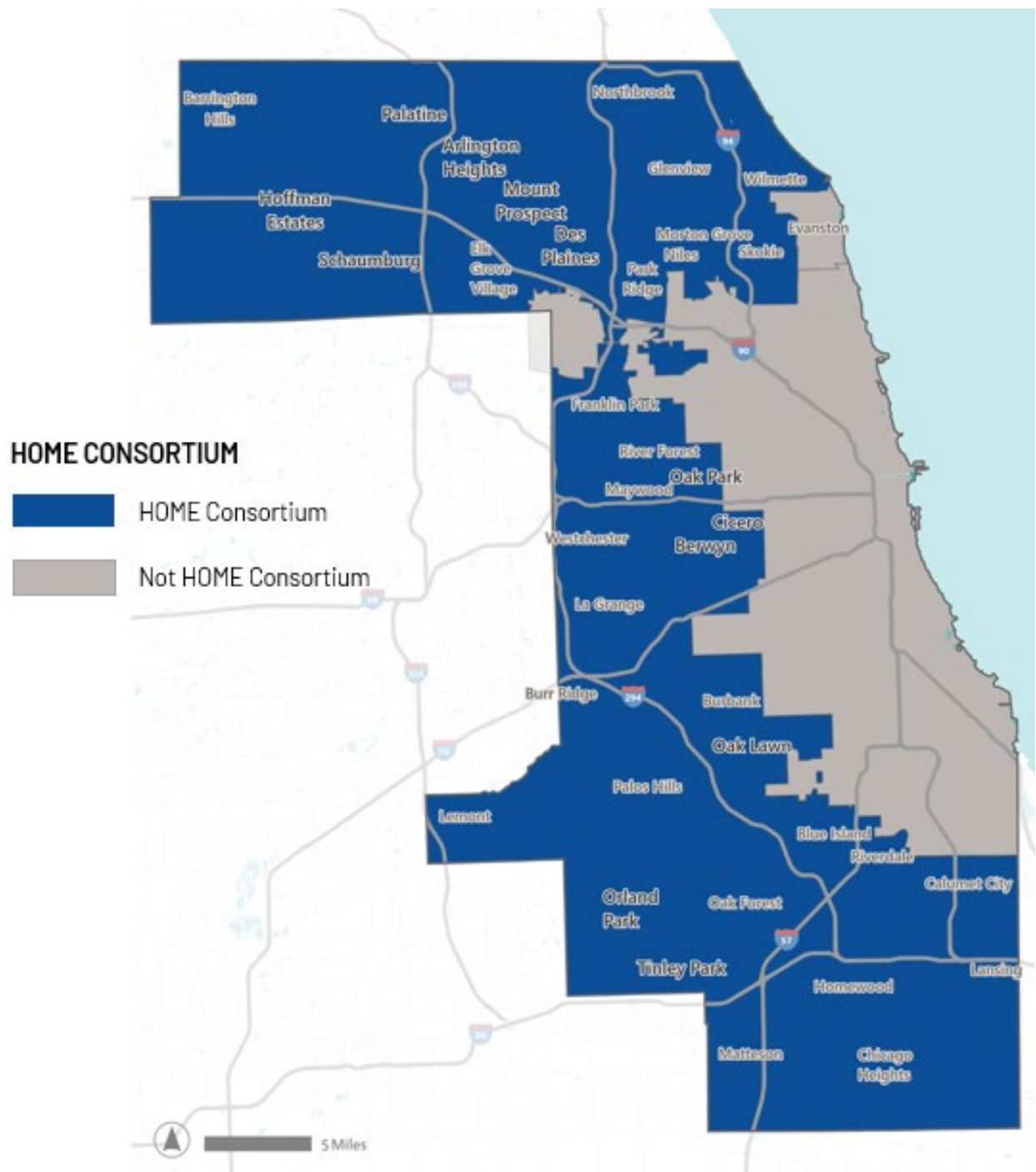
Source: Cook County, Esri, SB Friedman



Source: Cook County, Esri, SB Friedman



Source: Cook County, Esri, SB Friedman



Source: Cook County, Esri, SB Friedman

General Allocation Priorities

Describe the basis for allocating investments geographically within the jurisdiction (or within the EMSA for HOPWA)

While the draft Con Plan's goals are intended to stimulate economic growth throughout Suburban Cook County, geographic allocation priorities can help address specific underlying market conditions and funding structures relevant to the priority areas. Most investments are targeted to geographic areas with a prevalence of low-income households, lower home and land values, and less historic investment. These areas can benefit from investments in housing preservation, new affordable housing construction, economic and workforce development, infrastructure improvements, and public services.

Market conditions, trends, and priority geographies were identified through engagement and stakeholder feedback, plan review, and data analysis. Steering committee members and focus group participants highlighted areas of need through a SWOT analysis, while individual interviews with community service agencies, advocates, business leaders, and County staff provided additional context on local conditions and trends. The County conducted additional engagement to understand priority needs and geographic disparities as part of development of the 2024-2027 Policy Roadmap and BED Strategic Plan. The Project Team conducted analyses to understand the geographic distribution of household incomes, employment, housing cost burden, home values, and other economic and housing indicators.

In alignment with these allocation priorities and analysis, a significant percentage of DPD's HUD funding will be directed toward economic development, workforce development, housing, infrastructure, and community development efforts in South Suburban Cook County. Resources will also be targeted to West Suburban Cook County and Suburban Cook County overall, including the HOME Consortium and CDBG Priority Areas. To stimulate economic growth and address core housing needs across South Suburban Cook County, there are opportunities for investments in residential construction and preservation, economic development, infrastructure, workforce development, and public services. In West Suburban Cook County, there are opportunities for investments in residential construction and preservation of existing older housing stock, including naturally occurring affordable housing. The goal is to strengthen economic development, workforce development, and infrastructure, as well as provide services that help increase access to jobs, and help mitigate the impact of increasing housing costs for low- and moderate-income residents. Preservation of affordable housing will be a focus in the northern suburbs. Needs relevant to Suburban Cook County overall include transportation infrastructure, public services, affordable housing development, preservation of existing housing, workforce development, and economic development.

SP-25 Priority Needs - 91.215(a)(2)

Priority Needs

Priority Need	Housing and Homelessness	
Priority Level	High	
Population (Check Boxes)	Income Level:	
	Extremely Low:	X
	Low:	X
	Moderate:	X
	Middle:	
	Family Types:	
	Large Families:	X
	Families with Children:	X
	Elderly:	X
	Public Housing Residents:	X
	Homeless:	
	Rural:	
	Chronic Homelessness:	X
	Individuals:	X
	Families with Children:	X
	Mentally Ill:	X
	Chronic Substance Abuse:	X
	Veterans:	X
	Persons with HIV/AIDS:	X
	Victims of Domestic Violence:	X
	Unaccompanied Youth:	X
	Non-homeless Special Needs:	
	Elderly:	X
	Frail Elderly:	X
	Persons with Mental Disabilities:	X
	Persons with Physical Disabilities:	X
	Persons with Developmental Disabilities:	X
	Persons with Alcohol or Other Addictions:	X
	Persons with HIV/AIDS and their Families:	X
	Victims of Domestic Violence:	X
Non-housing Community Development:		
Other [Add Manually]:		

Geographic Areas Affected (Check Boxes)	South Suburban Cook County	X
	West Suburban Cook County	X
	Suburban Cook County	X
	CDBG Priority Area	X
	HOME Consortium	X
Associated Goals (Check Boxes)	Housing and Homelessness	
	Community Development	X
	Economic Development	X
	Workforce Development	X
	Infrastructure	X
	Planning and Administration	X
Description	<p>Priority: <i>Provide a continuum of quality, affordable housing for all.</i></p> <p>Objectives: 1.1 Develop and increase funding and its flexibility for affordable housing types, ensuring investments are community-driven and maximize impact. 1.2 Transform the County’s services for the unhoused to achieve housing security for our most vulnerable residents. 1.3 Fund programs and provide capacity building support to improve housing outcomes and build economic opportunity. 1.4 Support enhanced housing education, communications, and advocacy efforts. 1.5 Support environmental sustainability and positive health outcomes through housing investments and policies.</p>	
Basis for Relative Priority	<p>Housing and Homelessness was identified as a high priority based on stakeholder consultation (interviews, focus groups, and steering committee), alignment with other County plans and priorities, and data analysis.</p>	

Priority Need	Community Development	
Priority Level	High	
Population (Check Boxes)	Income Level:	
	Extremely Low:	X
	Low:	X
	Moderate:	X
	Middle:	
	Family Types:	
	Large Families:	X
	Families with Children:	X
	Elderly:	X
	Public Housing Residents:	X
	Homeless:	
	Rural:	
	Chronic Homelessness:	X
	Individuals:	X
	Families with Children:	X
	Mentally Ill:	X
	Chronic Substance Abuse:	X
	Veterans:	X
	Persons with HIV/AIDS:	X
	Victims of Domestic Violence:	X
	Unaccompanied Youth:	X
	Non-homeless Special Needs:	
	Elderly:	X
	Frail Elderly:	X
	Persons with Mental Disabilities:	X
	Persons with Physical Disabilities:	X
	Persons with Developmental Disabilities:	X
	Persons with Alcohol or Other Addictions:	X
Persons with HIV/AIDS and their Families:	X	
Victims of Domestic Violence:	X	
Non-housing Community Development:	X	
Other [Add Manually]:		
Geographic Areas Affected (Check Boxes)	South Suburban Cook County	X
	West Suburban Cook County	X
	Suburban Cook County	X
	CDBG Priority Area	X
	HOME Consortium	X

Associated Goals (Check Boxes)	Housing and Homelessness	X
	Community Development	
	Economic Development	X
	Workforce Development	X
	Infrastructure	X
	Planning and Administration	X
Description	<p>Priority: <i>Build healthy, connected, and sustainable communities where all residents have access to services and amenities.</i></p> <p>Objectives: 2.1 Foster a community-centered approach to implement community development and economic revitalization that supports fair access to opportunity for all. 2.2 Proactively address negative environmental conditions. 2.3 Promote policies and partnerships that support expanded healthcare access and improved health outcomes for vulnerable residents. 2.4 Facilitate and invest in comprehensive and coordinated approaches to proactively address violence and improve safety in highly impacted communities.</p>	
Basis for Relative Priority	<p>Community Development was identified as a high priority based on stakeholder consultation (interviews, focus groups, and steering committee), alignment with other County plans and priorities, and data analysis.</p>	

Priority Need	Economic Development	
Priority Level	High	
Population (Check Boxes)	Income Level:	
	Extremely Low:	X
	Low:	X
	Moderate:	X
	Middle:	
	Family Types:	
	Large Families:	X
	Families with Children:	X
	Elderly:	X
	Public Housing Residents:	X
	Homeless:	
	Rural:	
	Chronic Homelessness:	
	Individuals:	
	Families with Children:	
	Mentally Ill:	
	Chronic Substance Abuse:	
	Veterans:	
	Persons with HIV/AIDS:	
	Victims of Domestic Violence:	
	Unaccompanied Youth:	
	Non-homeless Special Needs:	
	Elderly:	
	Frail Elderly:	
	Persons with Mental Disabilities:	
	Persons with Physical Disabilities:	
	Persons with Developmental Disabilities:	
	Persons with Alcohol or Other Addictions:	
Persons with HIV/AIDS and their Families:		
Victims of Domestic Violence:		
Non-housing Community Development:	X	
Other [Add Manually]:		
Geographic Areas Affected (Check Boxes)	South Suburban Cook County	X
	West Suburban Cook County	X
	Suburban Cook County	X
	CDBG Priority Area	X
	HOME Consortium	X

Associated Goals (Check Boxes)	Housing and Homelessness	X
	Community Development	X
	Economic Development	
	Workforce Development	X
	Infrastructure	X
	Planning and Administration	X
Description	<p>Priority: <i>Foster inclusive, resilient economic growth that creates opportunities for all residents and businesses to thrive.</i></p> <p>Objectives: 3.1 Champion a regional approach to grow the economy and advance economic opportunity for all. 3.2 Invest in economic sectors with good jobs and positive economic, environmental, and social impact. 3.3 Grow the small business ecosystem, support innovation and entrepreneurship, and reduce wealth gaps. 3.4 Promote environmental sustainability in economic development initiatives. 3.5 Base investments on their capacity to promote fair economic growth.</p>	
Basis for Relative Priority	<p>Economic Development was identified as a high priority based on stakeholder consultation (interviews, focus groups, and steering committee), alignment with other County plans and priorities, and data analysis.</p>	

Priority Need	Workforce Development	
Priority Level	High	
Population (Check Boxes)	Income Level:	
	Extremely Low:	X
	Low:	X
	Moderate:	X
	Middle:	
	Family Types:	
	Large Families:	X
	Families with Children:	X
	Elderly:	
	Public Housing Residents:	X
	Homeless:	
	Rural:	
	Chronic Homelessness:	X
	Individuals:	X
	Families with Children:	X
	Mentally Ill:	X
	Chronic Substance Abuse:	X
	Veterans:	X
	Persons with HIV/AIDS:	X
	Victims of Domestic Violence:	X
	Unaccompanied Youth:	X
	Non-homeless Special Needs:	
	Elderly:	
	Frail Elderly:	
	Persons with Mental Disabilities:	X
	Persons with Physical Disabilities:	X
	Persons with Developmental Disabilities:	X
Persons with Alcohol or Other Addictions:	X	
Persons with HIV/AIDS and their Families:	X	
Victims of Domestic Violence:	X	
Non-housing Community Development:		
Other [Add Manually]:		
Geographic Areas Affected (Check Boxes)	South Suburban Cook County	X
	West Suburban Cook County	X
	Suburban Cook County	X
	CDBG Priority Area	X
	HOME Consortium	X

Associated Goals (Check Boxes)	Housing and Homelessness	X
	Community Development	X
	Economic Development	X
	Workforce Development	
	Infrastructure	X
	Planning and Administration	X
Description	<p>Priority: <i>Promote pathways to good jobs that support economic mobility for residents and meet the needs of employers.</i></p> <p>Objectives: 4.1 Align investments and incentives to intentionally support fair access to high-quality jobs that promote economic mobility. 4.2 Foster partnerships between employers, workforce service providers, and job seekers. 4.3 Strengthen internal County processes and policies to support current workers, job seekers, and workforce partners.</p>	
Basis for Relative Priority	<p>Workforce Development was identified as a high priority based on stakeholder consultation (interviews, focus groups, and steering committee), alignment with other County plans and priorities, and data analysis.</p>	

Priority Need	Infrastructure	
Priority Level	High	
Population (Check Boxes)	Income Level:	
	Extremely Low:	x
	Low:	x
	Moderate:	x
	Middle:	
	Family Types:	
	Large Families:	
	Families with Children:	
	Elderly:	
	Public Housing Residents:	
	Homeless:	
	Rural:	
	Chronic Homelessness:	
	Individuals:	
	Families with Children:	
	Mentally Ill:	
	Chronic Substance Abuse:	
	Veterans:	
	Persons with HIV/AIDS:	
	Victims of Domestic Violence:	
	Unaccompanied Youth:	
	Non-homeless Special Needs:	
	Elderly:	
	Frail Elderly:	
	Persons with Mental Disabilities:	
	Persons with Physical Disabilities:	
	Persons with Developmental Disabilities:	
	Persons with Alcohol or Other Addictions:	
	Persons with HIV/AIDS and their Families:	
	Victims of Domestic Violence:	
Non-housing Community Development:	x	
Other [Add Manually]:		
Geographic Areas Affected (Check Boxes)	South Suburban Cook County	x
	West Suburban Cook County	x
	Suburban Cook County	x
	CDBG Priority Area	x
	HOME Consortium	x

Associated Goals (Check Boxes)	Housing and Homelessness	x
	Community Development	x
	Economic Development	x
	Workforce Development	x
	Infrastructure	
	Planning and Administration	x
Description	<p>Priority: <i>Leverage infrastructure investments to promote resiliency, accessibility, and economic growth.</i></p> <p>Objectives: 5.1 Base investments on their capacity to promote fair economic growth. 5.2 Promote sustainability in infrastructure to guard against natural disasters and build resilience. 5.3 Increase regional accessibility and connectivity by investing in sustainable infrastructure throughout Cook County. 5.4 Implement a coordinated approach to pursuing available funding to support new construction and existing infrastructure needs.</p>	
Basis for Relative Priority	<p>Infrastructure was identified as a high priority based on stakeholder consultation (interviews, focus groups, and steering committee), alignment with other County plans and priorities, and data analysis.</p>	

Priority Need	Planning and Administration	
Priority Level	Low	
Population (Check Boxes)	Income Level:	
	Extremely Low:	X
	Low:	X
	Moderate:	X
	Middle:	X
	Family Types:	
	Large Families:	X
	Families with Children:	X
	Elderly:	X
	Public Housing Residents:	X
	Homeless:	
	Rural:	
	Chronic Homelessness:	X
	Individuals:	X
	Families with Children:	X
	Mentally Ill:	X
	Chronic Substance Abuse:	X
	Veterans:	X
	Persons with HIV/AIDS:	X
	Victims of Domestic Violence:	X
	Unaccompanied Youth:	X
	Non-homeless Special Needs:	
	Elderly:	X
	Frail Elderly:	X
	Persons with Mental Disabilities:	X
	Persons with Physical Disabilities:	X
	Persons with Developmental Disabilities:	X
Persons with Alcohol or Other Addictions:	X	
Persons with HIV/AIDS and their Families:	X	
Victims of Domestic Violence:	X	
Non-housing Community Development:	X	
Other [Add Manually]:		
Geographic Areas Affected (Check Boxes)	South Suburban Cook County	X
	West Suburban Cook County	X
	Suburban Cook County	X
	CDBG Priority Area	X
	HOME Consortium	X

Associated Goals (Check Boxes)	Housing and Homelessness	X
	Community Development	X
	Economic Development	X
	Workforce Development	X
	Infrastructure	X
	Planning and Administration	
Description	Priority: <i>Continue to develop an institutional framework, processes, and interdepartmental collaboration within Cook County, to support multi-jurisdictional collaboration, improved local capacity, and transparency.</i>	
Basis for Relative Priority	Planning and Administration was identified as a lower priority (relative to others) based on stakeholder and general public feedback provided during the consultation process, coupled with related data compilation and analysis. However, funds may still be provided to address this priority based upon identified planning needs. It is also important to note that DPD expects to utilize the full amount of eligible and available administrative funds to ensure continued grants management capacity and compliance.	

Table 1 – Priority Needs Summary

Narrative (Optional)

N/A

SP-30 Influence of Market Conditions – 91.215 (b)

Influence of Market Conditions

Affordable Housing Type	Market Characteristics that will influence the use of funds available for housing type
Tenant-Based Rental Assistance (TBRA)	Currently, Cook County does not anticipate allocating CDBG, HOME, or Emergency Solutions Grant Program (ESG) funds for tenant-based rental assistance. The public housing authorities provide TBRA through Housing Choice Vouchers (HCVs). Collectively the Housing Authority of Cook County (HACC), Oak Park Housing Authority (OPHA), and Housing Authority of Park Forest (HAPF) administer 14,595 HCVs that help meet the housing needs of low-income residents in Suburban Cook County. Market conditions such as increasing rents, low vacancy and available inventory, and a competitive market limit the ability to use HOME funds for TBRA.
TBRA for Non-Homeless Special Needs	Currently, Cook County does not anticipate allocating CDBG, HOME, or ESG funds for TBRA for non-homeless special needs populations. The public housing authorities provide TBRA through HCVs, including allocations of Special Purpose Vouchers (SPVs). SPVs include vouchers through Veterans Affairs Supportive Housing, the Family Unification Program, for residents with disabilities, and youth exiting the foster care system. Overall, market conditions such as increasing rents, low vacancy and available inventory, and a competitive market limit the ability to use HOME funds for TBRA. Additionally, special needs populations may require housing that is near transit or health services and/or ADA-compliant. These housing types are limited and typically have a price premium over other units, limiting the ability to use HOME funds for TBRA in these scenarios. DPD supports special needs populations through development of permanent supportive housing and service provision.
New Unit Production	Market factors that challenge new unit production include rising construction costs, high interest rates, and the inability of rents to offset those costs. High construction costs and income-restricted rents challenge affordable housing development by increasing the number of subsidy sources that must be leveraged on a per-unit basis. These dynamics place additional pressure on existing units, including naturally occurring affordable housing, which leads to rent increases. DPD leverages HOME funding to address funding gaps in affordable housing development projects that are a result of market pressures.

Rehabilitation	Rehabilitation of housing units is important to help maintain the existing housing stock, increase housing security, and support positive health outcomes for existing residents. Often, the cost of rehabilitating a unit is lower than the cost of producing a comparable new unit, making this a cost-effective strategy to stabilize the county’s housing supply and preserve affordable housing. However, there are challenges associated with rehabilitation, including high financing costs and low property values in certain areas that limit the ability to secure financing for acquisition and rehab costs. Furthermore, communities with greater concentrations of lower-income residents are less likely to have the financial capacity to address substandard housing conditions. Recognizing the importance and challenges of rehabilitation, Cook County invests resources in the remediation of health and safety hazards, including remediation of lead paint, mold, pests, unsafe electrical, and radon; structural repairs; and weatherization. DPD also invests in the rehabilitation and renovation of fixed-site shelters. DPD will ensure that funding recipients for housing rehabilitation projects have knowledge of and demonstrated capacity to work with the full range of County and other rehabilitation resources.
Acquisition, including Preservation	Acquisition and preservation of affordable housing is a critical and cost-effective strategy to maintain the existing housing stock and prevent the loss of affordable units, particularly in markets with increasing housing demand and rising prices. Market-driven challenges include obtaining funding to cover the costs of acquisition and rehabilitation that meets funding requirements in the face of increasing constructions costs and high interest rates. In stronger markets, affordable housing developers may also compete with private market developers who can pay higher acquisition costs.

Table 2 – Influence of Market Conditions

SP-35 Anticipated Resources - 91.215(a)(4), 91.220(c)(1,2)

Introduction

This draft Con Plan reflects the diversity of funding sources that the County anticipates using to support implementation. Beyond annual entitlements (i.e., CDBG, HOME, and ESG), the County expects other primary sources of funds to support this plan will include corporate funds, a CDBG-DR grant, and a CDBG-CV grant from the State of Illinois.

Cook County will utilize its corporate funds on an as-needed basis to support department operations, particularly associated with staffing for business and workforce development, as well as planning and administration.

Due to severe flooding in 2023 and 2024, the County has been awarded \$244 million in disaster relief funds to advance flood and disaster recovery efforts in areas of unmet need. The County is currently in the process of completing the required action plan for the \$244 million CDBG-DR grant.

The County plans to utilize \$4 million in remaining CDBG-CV funding from the State of Illinois to rehabilitate fixed-site shelters at Margarita Inn and Aloha Motel.

DPD administers several economic development programs, and those programs will also support implementation of this Strategic Plan. Over the five-year Con Plan period, approximately \$333 million in core resources (CDBG, HOME, ESG, CDBG-DR, and CDBG-CV funding) will spur an additional \$335 million in public, private, and philanthropic funding based on the County's historic funding patterns. The County intends to continue advocating for private and philanthropic funding participation to address key community and economic needs.

Beyond these core resources, the County will seek additional funds to support plan implementation. Additional funds may include fund matches; funding from the U.S. Economic Development Administration; Low Income Housing Tax Credits (LIHTCs); New Markets Tax Credits (NMTCs); Choice Neighborhoods grants; and other grants.

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of Con Plan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	Public - Federal	Acquisition Administration and planning Economic development Housing Public improvements Public services	10,516,157	0	0	10,516,157	42,000,000	CDBG funds support business and workforce development, infrastructure and public facilities, housing development and services, non-housing services, and planning and administration activities. The stated allocation for CDBG is an estimate and will be updated once the County receives the official allocation letter from HUD.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of Con Plan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
HOME	Public - Federal	Acquisition Homebuyer assistance Homeowner rehabilitation Multifamily rental new construction Multifamily rental rehabilitation New construction for ownership TBRA	5,777,500.17	6,700,000	0	12,477,500.17	22,800,000	HOME funds support housing development and services, and administration activities. The stated allocation for HOME is an estimate and will be updated once the County receives the official allocation letter from HUD.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of Con Plan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
ESG	Public - Federal	Rapid Rehousing Homeless Person Overnight Shelter Homeless Prevention Rental Assistance	848,353	0	0	848,353	3,400,000	ESG funds support housing services, non-housing services, and administration activities. The stated allocation for ESG is an estimate and will be updated once the County receives the official allocation letter from HUD.

Table 3 - Anticipated Resources

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

ESG funding recipients will provide a 1:1 match. HOME funding recipients will be required to demonstrate eligible match resources at or above the 25% threshold requirement. Typically, HOME funding accounts for 10% of overall project costs, delivering an 8:1 average lever on HOME funds.

CDBG funds do not explicitly require a match; however, DPD is beginning to track related data and may impose a specific match as a requirement in the future. Additional limited corporate funds or corporate tax incentives may also be deployed to achieve the goals of the Con Plan. Based on historic funding patterns, an estimated \$333 million in core resources over the five-year period has the potential to leverage an additional \$335 million in public, private, and philanthropic funding.

The Alliance to End Homelessness (the “Alliance”), which manages the Continuum of Care in Suburban Cook County, receives additional direct funding from HUD. The Alliance is awarded approximately \$16 million per year to support approximately 30 housing programs for people experiencing homelessness across Suburban Cook County. While these dollars do not flow directly through DPD, they are largely directed towards similar goals and DPD will continue to partner with the Alliance to ensure all available resources are appropriately leveraged to meet critical needs. These dollars, as well as other Alliance resources, are estimated to total \$71 million over the five-year period.

Beyond these core resources and associated leveraging, DPD will continue to pursue other competitive funding opportunities through public and private sources. Moreover, DPD continues to coordinate with other jurisdictions in the region to explore opportunities for information and resource sharing and general collaboration to increase efficiency in administration. DPD is also planning to implement a \$244 million CDBG-DR grant, and many of the CDBG-DR projects will leverage significant additional resources from other entities. The County plans to utilize \$4 million in remaining CDBG-CV funding from the State of Illinois to rehabilitate fixed-site shelters at Margarita Inn and Aloha Motel. HACC will contribute project-based vouchers for various residential projects. Private resources will be leveraged for both HOME and ESG initiatives.

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

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

Discussion

Anticipated CDBG, ESG, and HOME funds, in conjunction with CDBG-DR and other federal, state, and local funds, will leverage significant private investment in Suburban Cook County to accomplish the stated

objectives in housing and homelessness, community development, economic development, workforce development, infrastructure, and planning and administration.

SP-40 Institutional Delivery Structure – 91.215(k)

Explain the institutional structure through which the jurisdiction will carry out its consolidated plan including private industry, non-profit organizations, and public institutions.

Responsible Entity	Responsible Entity Type	Role	Geographic Area Served
Chicago Metropolitan Agency for Planning (CMAP)	Regional organization	Planning	Region
Metropolitan Planning Council	Regional organization	Planning	Region
Center for Neighborhood Technology	Other	Planning	Country
Alliance to End Homelessness	Continuum of care	Homelessness Planning	Jurisdiction
Housing Authority of Cook County	Public Housing Authority (PHA)	Homelessness Ownership Public Housing Rental	Jurisdiction
Oak Park Housing Authority	PHA	Homelessness Non-Homeless Special Needs Ownership Public Housing Rental	Jurisdiction

Cicero Housing Authority	PHA	Homelessness Non-Homeless Special Needs Ownership Public Housing Rental	Jurisdiction
Housing Authority of Park Forest	PHA	Homelessness Non-Homeless Special Needs Ownership Public Housing Rental	Jurisdiction
Various Councils of Government / Councils of Mayors	Government	Economic Development Ownership Planning Neighborhood Improvements Public Facilities Public Services	Jurisdiction
Cook County	Government	Economic Development Ownership Planning Rental Neighborhood Improvements Public Facilities Public Services	Region

Table 4 - Institutional Delivery Structure

Assessment of Strengths and Gaps in the Institutional Delivery System

Cook County’s extensive network of public, private, and nonprofit organizations have the capacity to provide housing, shelter, and economic opportunity to, and meet the infrastructure needs of, residents and businesses. Partners include DPD, other Cook County departments, municipalities, townships, councils of government/councils of mayors, philanthropic institutions, financial institutions, trade associations, businesses, public housing agencies, the Continuum of Care and its membership, residential and commercial developers, service providers, planning organizations, and more.

Particular areas of strength include regional planning through CMAP, and homeless assistance efforts through the Continuum of Care and its lead agency, the Alliance. CMAP provides regional data analysis and guidance on policy and planning to coordinate local efforts to solve regional planning, housing, and transportation challenges. The Alliance works to develop, fund, and implement solutions to end

homelessness by coordinating efforts among local housing and homelessness partners. Finally, the Chicago Area Fair Housing Alliance remains as a strong partner to address housing challenges at the local and regional levels.

However, gaps in the institutional delivery system exist, particularly in the provision of social services for the general public, persons with special needs, and persons experiencing homelessness or at risk of experiencing homelessness. While a wide range of services are provided across the county, there is not currently a comprehensive summary of all available providers and services. The lack of clear and comprehensive information leads to gaps in awareness and accessibility. There are also opportunities for nonprofits and community partners to further partnerships with one another to improve coordination and delivery of services for those in need. For example, while progress has been made in improving coordination between the Alliance and the Cook County Health System, discharge planning could still be improved to ensure persons released from various institutions do not exit into homelessness.

Availability of services targeted to homeless persons and persons with HIV and mainstream services

Homelessness Prevention Services	Available in the Community	Targeted to Homeless	Targeted to People with HIV
Homelessness Prevention Services			
Counseling/Advocacy	X	X	X
Legal Assistance	X	X	
Mortgage Assistance	X		
Rental Assistance	X	X	
Utilities Assistance	X	X	
Street Outreach Services			
Law Enforcement	X		
Mobile Clinics	X		
Other Street Outreach Services	X	X	
Supportive Services			
Alcohol & Drug Abuse	X	X	X
Child Care	X	X	
Education	X	X	
Employment and Employment Training	X	X	
Healthcare	X	X	
HIV/AIDS	X	X	X
Life Skills	X	X	X
Mental Health Counseling	X	X	X
Transportation	X	X	X
Other			
Other	X	X	X

Table 5 - Homeless Prevention Services Summary

Describe how the service delivery system including, but not limited to, the services listed above meet the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth)

Government, institutional, and nonprofit entities in Cook County offer a breadth of social services, including services targeted specifically to people experiencing homelessness, such as street outreach, healthcare, and housing assistance, and to people living with HIV/AIDS, such as counseling, advocacy, addiction prevention, and healthcare. The institutional delivery system prioritizes shelter and basic needs first, before also connecting individuals to services for healthcare, employment and long-term housing. The County plans to utilize \$4 million in remaining CDBG-CV funding from the State of Illinois to rehabilitate/renovate fixed-site shelter projects at Margarita Inn and Aloha Motel to provide additional shelter capacity for residents experiencing homelessness.

Individuals experiencing homelessness can contact the coordinated entry system by dialing “211” or reaching out to one of many nonprofit partners. Coordinated entry is a community-wide system that standardizes and expedites the process by which individuals and families experiencing homelessness or who are at imminent risk of homelessness access shelter, housing, and homeless resources. By creating a standardized intake system and mutually accessible information, coordinated entry has helped Suburban Cook County better target the limited resources provided for assistance to individuals and families experiencing homelessness across multiple agencies and organizations. Individuals experiencing homelessness are connected to shelter options, tailored to special needs status as applicable, such as families, victims of domestic violence, veterans, or unaccompanied youth. Connections for the Homeless (Connections) indicated in an interview with the Project Team that intake into a shelter begins with a meal, shower, and connection with a case manager. A walk-up food pantry is also available to help meet basic needs for those not requiring shelter.

Working with case managers, individuals can move from emergency shelters to temporary or permanent supportive housing, when available, where they can receive ongoing supportive services tailored to their needs. Supportive services may include healthcare, transportation, childcare, and others, depending on the needs of the client. Additionally, individuals can receive support for job training or employment opportunities to assist in securing stable employment and ultimately a path to independence. Additional permanent supportive housing beds and staffing for supportive resources are needed, as beds are nearly always at capacity.

Connections and other providers connected to “211” may also assist county residents with rental assistance when homelessness is imminent. Immediate financial assistance can help cover late rent, bills, or other one-time financial burdens that could lead to a loss of housing. This type of swift, preventative action can prevent an individual or family from ever experiencing homelessness.

Describe the strengths and gaps of the service delivery system for special needs population and persons experiencing homelessness, including, but not limited to, the services listed above

The institutional delivery system in Suburban Cook County benefits from the breadth of services provided by a network of dedicated nonprofits, government entities, and institutions. Many nonprofits working to prevent and respond to homelessness specifically cater to special needs populations such as veterans, unaccompanied youth, victims of domestic violence, and those living with HIV/AIDS or disabilities. Several of these organizations have dedicated shelter space for the special needs populations they work with, complemented by specialized services, resulting in a tailored experience that better meets the specific needs of individuals. The coordinated entry system provides a streamlined point of contact to connect people experiencing homelessness to appropriate shelter and care. Through the system, support can be administered rapidly, connecting individuals with shelter and care, or providing resources to help prevent homelessness.

While the coordinated entry system has helped to coordinate services for those experiencing homelessness, there remain areas for improvement, especially as it pertains to coordination between service partners. Those receiving care can be connected to a range of nonprofit partners through the coordinated entry system; however, there can be gaps in communication and coordination if services are provided by multiple organizations. Through interviews with the Project Team, some nonprofits have reported a desire for an electronic system accessible by all partners that tracks the needs of an individual and the services they have received. Currently, in some cases, an individual could receive services from multiple organizations, some of which may be duplicative. A system that better tracked and coordinated services could help providers be more informed in evaluating and responding to client needs, resulting in a more efficient allocation of resources.

The coordinated entry system relies on those in need being aware of the “211” phone number or directly reaching out to a service provider. Many who need the services available through the system may not be aware of how to make contact. Increasing awareness of the coordinated entry system and providing more frequent access points to make connections with those in need would help more people. Finally, limited funding and the resulting constrained service capacity result in unmet needs. Medical respite beds, emergency shelter beds, and permanent supportive housing operate at or near capacity, limiting options for those in need. Additional funding is needed to provide more physical resources such as beds and shelter space, as well as improved service delivery.

Provide a summary of the strategy for overcoming gaps in the institutional structure and service delivery system for carrying out a strategy to address priority needs

Increased coordination between public, private, and nonprofit partners can help address the gaps in the institutional delivery system. Strategies include creating new forums for communication and coordination of resources among nonprofits and developing an electronic system to track and coordinate client needs and services among nonprofit partners, as mentioned in the prior prompt. The electronic system could also incorporate nonprofit partners and housing providers, to help connect clients to available housing

likely to accept vouchers in their communities, for example. Improving communication and coordination among nonprofit partners, as well as housing providers and government entities, will result in more efficient use of resources and closing service gaps for those in need.

Organizations in the county have identified and piloted a solution to address the lack of shelter beds by acquiring hotels and converting them to shelter space. The Alliance identified a need for additional shelter beds in 2021, and identified use of the hotel-to-shelter conversion model as a viable method. This model has been successful in two recent examples: the Margarita Inn in Evanston (operated by Connections for the Homeless) and the Write Inn in Oak Park (operated by Housing Forward). Cook County provided funding to support acquisition of the hotels, with operations provided by the local nonprofits. This model could be expanded and replicated in other parts of the county to reuse additional older buildings and increase shelter availability.

The Alliance is developing a full strategic plan in 2025 that will consider these and other capacity and systems improvements. This plan will underscore four primary service areas: homelessness and eviction prevention; crisis response and shelter; connecting residents to permanent housing; and special needs services. Improving data collection, consistency, and sharing between organizations will also help to better understand and plan for client needs. The Alliance currently meets with the County every two weeks, an important step in improving communications and coordination between the public and nonprofit sectors as the County continues to plan for its allocation of CDBG-DR funds and other state and local resources.

Limited available funding continues to challenge addressing gaps in the institutional delivery system. Much funding available over the last five years, such as the funding used for the hotel-to-shelter conversions, were one-time funding sources. Continued availability of federal, state, and local resources to continue to fund operation and expansion of this model is needed. There is also an opportunity to pursue additional resources from the private and philanthropic sectors to help leverage public funding, though additional outreach and fundraising efforts will be needed. Utilizing available public funds to leverage private and philanthropic investments will be critical in the next five years to bolster funding streams.

SP-45 Goals Summary – 91.215(a)(4)

Goals Summary Information

Goal Name	Start Year	End Year	Outcome	Objective	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
Housing and Homelessness	2025	2029	Affordability	Provide decent affordable housing	Affordable Housing Public Housing Special Needs	South Suburban Cook County West Suburban Cook County Suburban Cook County CDBG Priority Area HOME Consortium	Housing and Homelessness Community Development Economic Development Workforce Development Infrastructure Planning and Administration	HOME: \$25,650,000 ESG: \$4,250,000	Rental units constructed: 1,610 units Rental units rehabilitated: 242 units TBRA/Rapid Re-housing: 250 Households Assisted Homeless Person Overnight Shelter: 5,000 Persons Assisted Homelessness Prevention: 350 Persons Assisted

Goal Name	Start Year	End Year	Outcome	Objective	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
Community Development	2025	2029	Availability/ Accessibility	Create economic opportunities	Homeless Non-Homeless Special Needs	South Suburban Cook County West Suburban Cook County Suburban Cook County CDBG Priority Area HOME Consortium	Housing and Homelessness Community Development Economic Development Workforce Development Infrastructure Planning and Administration	CDBG: \$7,875,000	Public service activities other than Low-/ Moderate-Income Housing Benefit: 60.000 Persons Assisted

Goal Name	Start Year	End Year	Outcome	Objective	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
Economic Development	2025	2029	Availability/ Accessibility	Create economic opportunities	Non-Housing Community Development	South Suburban Cook County West Suburban Cook County Suburban Cook County Suburban Cook County CDBG Priority Area HOME Consortium	Housing and Homelessness Community Development Economic Development Workforce Development Infrastructure Planning and Administration	CDBG: \$112,250	Public service activities other than Low-/ Moderate-Income Housing Benefit: 375 Persons Assisted

Goal Name	Start Year	End Year	Outcome	Objective	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
Workforce Development	2025	2029	Availability/ Accessibility	Create economic opportunities	Non-Housing Community Development	South Suburban Cook County West Suburban Cook County Suburban Cook County Suburban Cook County CDBG Priority Area HOME Consortium	Housing and Homelessness Community Development Economic Development Workforce Development Infrastructure Planning and Administration	CDBG: \$112,250	Public service activities other than Low-/Moderate-Income Housing Benefit: 375 Persons Assisted

Goal Name	Start Year	End Year	Outcome	Objective	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
Infrastructure	2025	2029	Sustainable	Create economic opportunities	Non-Housing Community Development	South Suburban Cook County West Suburban Cook County Suburban Cook County CDBG Priority Area HOME Consortium	Housing and Homelessness Community Development Economic Development Workforce Development Infrastructure Planning and Administration	CDBG: \$33,900,000	Cities and Villages Assisted: 125 Businesses Assisted: 20

Goal Name	Start Year	End Year	Outcome	Objective	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
Planning and Administration	2025	2029	Sustainability	Create economic opportunities	Planning and Administration	South Suburban Cook County West Suburban Cook County Suburban Cook County CDBG Priority Area HOME Consortium	Housing and Homelessness Community Development Economic Development Workforce Development Infrastructure Planning and Administration	CDBG: \$10,500,000 HOME: \$2,850,000	N/A

Table 6 – Goals Summary

Goal Descriptions

1	Goal Name	Housing and Homelessness
	Goal Description	<p>Goal: Provide a continuum of quality, affordable housing for all.</p> <p>Objectives: 1.1 Develop and increase funding and its flexibility for affordable housing types, ensuring investments are community-driven and maximize impact. 1.2 Transform the County’s services for the unhoused to achieve housing security for our most vulnerable residents. 1.3 Fund programs and provide capacity building support to improve housing outcomes and build economic opportunity. 1.4 Support enhanced housing education, communications, and advocacy efforts. 1.5 Support environmental sustainability and positive health outcomes through housing investments and policies.</p>
2	Goal Name	Community Development
	Goal Description	<p>Goal: Build healthy, connected, and sustainable communities where all residents have access to services and amenities.</p> <p>Objectives: 2.1 Foster a community-centered approach to implement community development and economic revitalization that supports fair access to opportunity for all. 2.2 Proactively address negative environmental conditions. 2.3 Promote policies and partnerships that support expanded healthcare access and improved health outcomes for vulnerable residents. 2.4 Facilitate and invest in comprehensive and coordinated approaches to proactively address violence and improve safety in highly impacted communities.</p>
3	Goal Name	Economic Development
	Goal Description	<p>Goal: Foster inclusive, resilient economic growth that creates opportunities for all residents and businesses to thrive.</p> <p>Objectives: 3.1 Champion a regional approach to grow the economy and advance economic opportunity for all. 3.2 Invest in economic sectors with good jobs and positive economic, environmental, and social impact. 3.3 Grow the small business ecosystem, support innovation and entrepreneurship, and reduce wealth gaps. 3.4 Promote environmental sustainability in economic development initiatives. 3.5 Base investments on their capacity to promote fair economic growth.</p>

4	Goal Name	Workforce Development
	Goal Description	<p>Goal: Promote pathways to good jobs that support economic mobility for residents and meet the needs of employers.</p> <p>Objectives: 4.1 Align investments and incentives to intentionally support fair access to high-quality jobs that promote economic mobility. 4.2 Foster partnerships between employers, workforce service providers, and job seekers. 4.3 Strengthen internal County processes and policies to support current workers, job seekers, and workforce partners.</p>
5	Goal Name	Infrastructure
	Goal Description	<p>Goal: Leverage infrastructure investments to promote resiliency, accessibility, and economic growth.</p> <p>Objectives: 5.1 Base investments on their capacity to promote fair economic growth. 5.2 Promote sustainability in infrastructure to guard against natural disasters and build resilience. 5.3 Increase regional accessibility and connectivity by investing in sustainable infrastructure throughout Cook County. 5.4 Implement a coordinated approach to pursuing available funding to support new construction and existing infrastructure needs.</p>
6	Goal Name	Planning and Administration
	Goal Description	<p>Goal: Continue to develop an institutional framework, processes, and interdepartmental collaboration within Cook County to support multi-jurisdictional collaboration, improved local capacity, and transparency.</p>

Estimate the number of extremely low-income, low-income, and moderate-income families to whom the jurisdiction will provide affordable housing as defined by HOME 91.315(b)(2)

Over the next five years, the County anticipates providing affordable housing to approximately 1,610 families: 322 extremely low-income families, 805 low-income families, and 483 moderate-income families. All of the affordable housing provided by the County is anticipated to be via rental units. No affordable housing via home ownership is anticipated at this time.

SP-50 Public Housing Accessibility and Involvement – 91.215(c)

Need to Increase the Number of Accessible Units (if Required by a Section 504 Voluntary Compliance Agreement)

The HACC’s rehabilitation of the Sunrise Apartments includes renovation and modernization of the 80 existing units, and construction of 27 additional units. The renovated and new units will be designed to accommodate households with physical disabilities. Renovation will address other structural and mechanical improvements to align with the current code and replace flooring, cabinetry, and appliances. A new elevator will improve accessibility, and additional community space will be designed to be accessible to all residents. Future HACC renovations to other public housing sites may also include accessibility features as those renovations take place. OPHA has recently converted one floor of its sole public housing development to be fully accessible, and has invested in elevator repairs and maintenance.

Activities to Increase Resident Involvement

HACC indicated public housing properties offer programs to encourage resident collaboration, as well as opportunities to engage with building management. Buildings offer seasonal activities like holiday decorating and crafts, as well as monthly activities like bingo and game nights. Pending funding availability, additional activities are planned, including back-to-school events for children and fitness classes.

Residents are encouraged to participate in the management and maintenance of their buildings. Typically, at least one resident per property volunteers to be a representative for resident concerns and acts as a liaison to management. Building management holds periodic meetings with tenants to understand any maintenance concerns or other areas for improvement. OPHA is informed of tenant needs through a council of tenants and open public meetings.

Is the public housing agency designated as troubled under 24 CFR part 902?

No public housing agencies in the primary jurisdiction are currently designated as troubled.

Plan to remove the ‘troubled’ designation

Not applicable. No public housing agencies in the primary jurisdiction are currently designated as

troubled.

SP-55 Barriers to affordable housing – 91.215(h)

Barriers to Affordable Housing

Barriers to affordable housing include public policy and regulation and market-driven factors, such as the high—and rising—cost of construction. Persistent cost increases have been driven by supply chain challenges, costs of core materials, labor costs, and persistently high interest rates. Increases in building operating costs and uncertainty over future costs also challenge affordable housing production. Operating cost increases in Suburban Cook County are driven by rising insurance costs and a property tax system that results in inconsistent assessments and tax burdens. These costs limit the availability of institutional capital and private debt, increase risks for developers, and ultimately increase the costs of development when buildings are required to carry large operating reserves or pay higher rates of return on capital due to increased risk.

The County’s property tax assessment system is a core public policy challenge that limits new construction and strains the affordability of existing housing. Fluctuations in assessment methodology, a lengthy appeal process that involves multiple entities, and increases in levies across many overlapping taxing districts lead to unpredictable shifts in property tax burdens, particularly relative to other markets nationally with stable property tax systems that offer predictable changes over time. Inconsistencies in the assessment process can also create affordability challenges for residents of existing housing, particularly if property taxes increase at a faster pace than incomes. The County’s higher assessment ratio for commercial properties compared to residential properties makes the county less competitive for commercial and industrial development than neighboring counties and other regions nationally. As businesses leave the county for surrounding counties and states with more favorable tax conditions, residents are left with a greater share of the property tax burden. This has particularly adverse impacts in low-income areas of the county with smaller existing tax bases.

Complicated financing structures and regulations intended to ensure long-term affordability impede its efficient, timely, and cost-effective development. Projects must secure multiple sources of federal, state, and local subsidies to complete the capital stack for construction. Many funding sources come with specific design, construction, and operational requirements. Given the unmet need for affordable units, the competition for available funding is intense, with most projects applying multiple years in a row before they are awarded funding. These factors increase the time and risk associated with development, leading to increases in project costs. Projects with a need for deeper subsidy—including permanent supportive housing and housing affordable to households earning less than 30% AMI—are particularly challenged.

Additional regulatory and public policy barriers impacting affordable housing development occur primarily at the local level and include zoning, outdated and/or convoluted building codes, unclear or extended

permitting and entitlement processes, and local resident opposition to new development. Most municipalities are home-rule jurisdictions, limiting the County's ability to implement comprehensive policies and regulations. Zoning allowing only single-family homes, minimum lot sizes, and other effectively exclusionary zoning practices limit the construction of new affordable multifamily housing. Inconsistent, complicated, and/or unclear permitting and entitlement procedures increase development time and risk, increasing project costs and dissuading developers from pursuing projects. Finally, local resident opposition to new housing development constitutes a significant barrier to affordable housing by limiting new construction, leading to higher prices and more competition for limited affordable housing.

Strategy to Remove or Ameliorate the Barriers to Affordable Housing

Cook County's strategy to reduce barriers to affordable housing includes supporting new construction, preserving existing housing, increasing temporary and permanent housing solutions for residents at risk of homelessness, addressing regulatory impediments, developing local capacity, and advocating for sustainable funding sources.

Building more and preserving existing affordable housing are key to addressing needs in areas of opportunity and areas with aging, disinvested housing stock. The County aims to increase resources to build and rehabilitate income-restricted affordable housing units for both owners and renters; support and incentivize local investments in areas with strong access to jobs, transit, community amenities, and other assets, with a particular focus on housing for residents with incomes under 60% AMI; and incentivize development in areas well-served by public transit and/or near job concentrations. The County is focused on increasing funding for preservation; improving the condition and preserving affordability of the unsubsidized affordable housing stock in priority geographies; and refining and expanding energy efficiency programs that reduce housing-related costs and increase housing quality.

To increase the availability and affordability of shelter and housing for residents experiencing or at risk of homelessness, the County will continue to identify opportunities for hotel- and office-to-residential conversions.

The County is committed to advocating for public policy changes. The County intends to support reforming the property assessment and taxation system to reduce the disproportionate tax burden on lower-income homeowners and support business development, leveraging recent progress through the Southland Reactivation Act, the Cook County Affordable Housing Special Assessment Program, and other initiatives. The County will also identify opportunities to support municipal staff capacity and address local regulatory and policy impediments to affordable housing. These efforts are expected to include incentivizing local zoning reform by prioritizing County funding for municipalities that have taken steps to increase housing production; increasing education around the positive fiscal impacts of housing development; and building local capacity by providing sample zoning language and design guidelines to municipalities. Finally, the County will continue to advocate for statewide zoning and housing policy reform to increase availability of affordable units, and to increase education, publicity, and coordination around state and federal funding sources.

SP-60 Homelessness Strategy – 91.215(d)

Describe how the jurisdiction’s plans and goals contribute to:

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

DPD requires all agencies to involve homeless or formerly homeless persons in policy-making roles. The level to which agencies involve these populations affects their competitiveness in obtaining funding. DPD staff work with subrecipients to encourage agencies to enhance participation of people with lived experiences and provide technical assistance to ensure their successful involvement in policy roles. The Alliance (the lead agency of the Continuum of Care (CoC)), includes people who have experienced homelessness on their board and their Community Based Service Area committees that span the three regions of Cook County. In addition, DPD publishes its Annual Action Plan every year prior to approval and seeks public feedback during a 30-day public comment period and a public hearing.

DPD supports specific homeless outreach activities through the CoC, a critical first step in connecting people experiencing chronic homelessness with the services they need and reducing the length of time they spend homeless. Street outreach is utilized to identify people experiencing homelessness who might not use shelter or services. This outreach includes building relationships, checking on and monitoring clients’ welfare, assessing vulnerability, providing linkages to services, and providing follow-up case management. The Alliance’s Experience and Outreach Coordinator helps oversee staff from CoC partner organizations who canvas specific areas regularly. They also leverage community partnerships, village halls, libraries, transit agencies, and other agencies to identify at-risk individuals and meet people where they are. The CoC has expanded outreach, increased geographic coverage, and secured more resources for street outreach. However, the sheer size of Suburban Cook County—573 square miles—challenge scaling street outreach, particularly as the resources to support direct outreach are limited.

In 2016, the Alliance began rolling out a new coordinated entry system, connecting those experiencing homelessness with a single point of contact to shelter and supportive services providers. The County funds service programs like healthcare, youth programs, early childhood education, and financial literacy to help create an integrated system of mutually supportive services in pursuit of continued reductions in homelessness, increased employment and workforce job opportunities, and improved health outcomes. The County remains committed to integrating supportive services with housing to increase organizational efficiency and program outcomes. The County will continue to target investments in both large-scale organizations and smaller-scale providers to expand the reach of services and enable innovative service offerings.

DPD coordinates closely with the CoC on outreach, including the use of the by-name list to identify and serve chronically homeless individuals. The by-name list is a comprehensive, real time list of those experiencing homelessness, outlining their personal roadblocks to consistent housing. It coordinates data from homeless service providers to establish a common point of information on a single person’s condition and needs. Suburban Cook County began implementation of the by-name list for veterans in

May 2017 and expanded to include those experiencing chronic homelessness by November 2017. Expansion of the populations covered by this list would allow for better allocation of resources for those experiencing homelessness.

Addressing the emergency and transitional housing needs of homeless persons

The primary goal of addressing homelessness is to help each household experiencing homelessness secure temporary shelter or permanent housing as quickly as possible. In many cases, the pathway from homelessness to housing includes a stay in a short-term program, whether an emergency shelter bed, transitional housing, or “interim”/“bridge” housing. These interventions are critical elements of the system, but are not permanent solutions. The effectiveness of temporary housing solutions is measured based on how effectively they help people transition from homelessness into permanent housing.

One method of intake to the coordinated entry system is the “211” call line, which services all of Cook County. Based on a needs assessment conducted during the call, an individual is connected with homelessness prevention services and/or a 24–48-hour shelter stay. Homelessness prevention services focus on addressing the individual’s current challenges that put them at risk of imminent homelessness. The Alliance noted in an interview with the Project Team that a frequent challenge reported by “211” callers is the inability to make rent payments that are past due. The County funds a temporary rental assistance program that assists individuals facing short-term financial barriers, who could otherwise pay rent moving forward, with one-time assistance. More upstream prevention is needed to identify and support individuals before they fall behind on rent payments.

For people in crisis who have nowhere to go, “211” can refer them to a 24–48-hour shelter placement via the coordinated entry system at one of nine agencies across the county. However, the need for shelter beds far outweighs the supply. Additionally, flexible alternatives to shelter placement are needed, as moves to shelters can be disruptive, particularly for households with children. United Way provides some flexible funds to help individuals resolve crisis situations outside of the shelter system. The “211” call line has been very successful, with 144,000 requests for assistance in 2024 alone. The largest category of requests was related to housing and shelter (41,000 requests, 30% of total). Of these requests, 41% were for rent assistance, 31% for assistance finding low-cost housing, and 13% for accessing shelters.

Alternative access points to the coordinated entry system are needed for those who lack access to a phone or knowledge of the service. Beyond “211,” the County and CoC partners are focused on Rapid Resolution strategies that can help limit the time an individual or family spends in a shelter. These strategies provide wraparound services like rental, job placement, and other forms of assistance that help households secure stable housing outside the shelter system.

Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals

and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again.

Reducing the amount of time that individuals and families experience homelessness requires appropriate available housing, social services, and employment opportunities to support them. Secure housing is the most important need of homeless individuals and families. Without the stability and safety of consistent housing, it is difficult or impossible to meet work, family and healthcare needs. Therefore, increasing the number of affordable housing options in Suburban Cook County is the most important step to preventing and resolving homelessness. Temporary housing may include rapid re-housing or transitional housing, which last at most for two years. These temporary housing options provide a path to exiting homelessness by combining housing with social services and supports. The County plans to utilize \$4 million in remaining CDBG-CV funding from the State of Illinois to rehabilitate/renovate fixed site shelter projects at Margarita Inn and Aloha Motel to provide additional temporary shelter capacity for residents experiencing homelessness.

DPD relies on a network of nonprofit organizations to host shelter beds and connect individuals with social services. Many organizations specifically serve the needs of particular groups, such as veterans, unaccompanied youth, and those living with mental or physical disabilities or HIV/AIDS. The counseling, healthcare, educational, and other services provided by these groups help connect clients to appropriate housing, employment, and healthcare.

Continuation of these services, even after permanent housing has been secured, is crucial to preventing the recurrence of homelessness. Workforce development programs, such as those funded by the Workforce Innovation and Opportunity Act, help to connect individuals to training and employment opportunities that can provide stable incomes. Additional resources are needed for workforce development to coach clients and connect those who need employment with employers. Ongoing rental assistance or a housing voucher may be needed to bridge the gap between achievable income and high housing costs.

Potential new solutions are being tested through pilot programs. One such program, the barrier reduction fund, will test the impact of paying for childcare, transportation, and other common cost barriers to improve employment and housing outcomes for recipients. The State and County have utilized the pilot system in the past as a way to test the efficacy of potential new programs and make modifications before complete roll out.

Help low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families who are likely to become homeless after being discharged from a publicly funded institution or system of care, or who are receiving assistance from public and private agencies that address housing, health, social services, employment, education or youth needs

Individuals who are at risk or imminent risk of homelessness and call “211” are provided with resources to avoid homelessness, when possible. Those who have days or weeks to avoid homelessness can receive

mediation services or support to work with their housing provider and remain housed. Those with more immediate risk of homelessness can receive short-term financial support, such as emergency funding for bills or rent that will allow them to catch up on payments and retain their housing.

Upon exiting institutions or systems of care, individuals may face significant challenges that can lead to homelessness. Those leaving hospitals or emergency rooms may be eligible to use medical respite beds, which provide a place to continue recovery when institutional medical care is no longer needed, but the individual is at risk of exacerbating their condition by being homeless. Housing Forward operates a medical respite facility with 18 beds. Patients may be referred by an emergency room and stay through recovery. Though Cook County leads the state for the number of medical respite beds, there are only 40 beds which are often at capacity. More medical respite beds are needed to adequately serve the population.

There is no similar program for individuals exiting mental healthcare facilities in the county. While recovery looks different for those leaving mental health institutions, aftercare is critical to prevent the recurrence of mental health crises that could result in homelessness or readmittance to a medical facility. A medical respite program focused on individuals exiting mental health facilities is needed in Suburban Cook County.

SP-65 Lead based paint Hazards – 91.215(i)

Actions to address LBP hazards and increase access to housing without LBP hazards

Reflecting the early history of Cook County and rapid population growth in the early and mid-20th century, nearly 75% of the housing stock in Suburban Cook County was built before 1980. Many of these homes that were constructed before 1978 likely include lead-based paint (LBP), a potential public health hazard for residents. Lead is a highly toxic metal that can cause permanent damage to the nervous system even in small amounts, affecting behavior and learning development. Children under the age of six are particularly vulnerable. While the use of LBP in child-occupied structures was banned in 1978, LBP continues to be found in older homes. This is a particular challenge in west and north Suburban Cook County where the oldest housing stock constructed prior to 1940 is concentrated.

In developing Uplift Cook, DPD engaged with Cook County Health, a nonprofit that has served the people of Cook County for more than 180 years and has a proud legacy as a leader in advancing health care. Cook County Health operates the Cook County Department of Public Health (DPH), which was established in 1945 and is the state-certified and nationally accredited public health agency for Suburban Cook County outside of Chicago, Evanston, Oak Park, Skokie, and Stickney Township. DPH serves approximately 2.5 million residents in 124 municipalities and strives to meet public health needs through effective and efficient disease prevention and health promotion programs. DPH offers an array of services to address LBP hazards through its Lead Poisoning Prevention and Healthy Homes Unit. Children with blood test results of 10µg/dL and higher or with a physician's order receive an in-home LBP inspection. Those with blood test results of 20µg/dL and higher also receive a home visit from a nurse. Through partnerships with the Community and Economic Development Association (CEDA), City of Chicago Department of Public

Health, Evanston Health Department, and Illinois Department of Public Health, DPH also provides funding and technical assistance to qualified landlords to correct LBP hazards.

Funding is also available for local governments and nonprofit organizations to expand programs to control LBP hazards in eligible housing. DPH has received funding from HUD to support the testing and remediation of LBP hazards in homes for households earning less than 80% AMI. Local funding supported additional testing and remediation efforts for households earning between 80% and 120% AMI. DPH also operates an LBP remediation program for preventive action (households that meet income qualifications but have not had a child test above the threshold for blood lead levels). DPH indicated in an interview that the administrative demands of acceptance to the program (such as providing proof of income) have been a deterrent to applicants. Streamlining the application and approval process would likely increase the number of applicants and households who receive assistance.

To date, 176 homes have been remediated of LBP hazards with HUD funding, including 98 homes during the first grant cycle and 78 homes during the current grant cycle. An additional 65 homes are in the pipeline to be remediated, resulting in 241 total homes that have been remediated or are in the pipeline. LBP remediation programs will require additional funding, with the HUD portion of funding set to expire in 2026, and the local share having already expired without a replacement source identified. HOME funding may be utilized for LBP remediation on residential properties during the rehabilitation and renovation process. DPD and DPH will continue to coordinate to explore competitive funding opportunities related to LBP outreach/education, hazard reduction, and remediation. Additionally, DPD will ensure that all housing rehabilitation work undertaken is compliant with all federal, state, and local LBP hazard mitigation and remediation protocols.

How are the actions listed above related to the extent of lead poisoning and hazards?

DPD seeks to provide funding to program operators with knowledge of and demonstrated capacity to work with other rehabilitation resources, including the County's LBP and radon testing programs, and energy efficiency programs operated by private and nonprofit partners. Operators must indicate how they will incorporate the best practices associated with HUD's Healthy Homes program, reducing environmental hazards in rehabilitated units. Consistent with other County policies, the priority housing rehabilitation programs likely to be most effective would also link with other social services, including housing counseling. Older homes or those located in areas with high incidence of lead poisoning may be prioritized for assistance.

DPH indicated in an interview that finding partners trained and willing to do LBP remediation work can be difficult. To address this, DPH has operated a training program in partnership with municipalities to identify potential partners and provide training on best practices for LBP remediation.

As the County considers creating housing rehabilitation programs, it will look for operators to leverage outside resources, such as the following:

Radon: Cook County provides residents and nonprofit organizations with low-cost radon test kits. The kits are available to residents free of charge. Renters may also purchase test kits, and nonprofit organizations can conduct rehabilitation work on behalf of renters.

Lead: DPH provides LBP services in Cook County, including inspections, testing, and remediation. Through partnerships with CEDA and several municipal health departments, DPH provides funding to qualified landlords to remediate LBP hazards in homes. DPH also makes funds available to local governments and nonprofit organizations to address LBP exposure and remediate housing.

Energy efficiency: DCEO operates several residential weatherization and energy efficiency programs. The Illinois Home Weatherization Assistance Program provides funds for actions including air sealing, insulation, furnace repair and replacement, and energy load reduction to income-qualified households. Through its Office of Urban Assistance, DCEO also administers the Urban Weatherization Initiative to improve energy efficiency and reduce energy costs in communities facing housing challenges in several Illinois counties, including Cook. The program provides grants to organizations that provide training and develop employment opportunities for energy auditors and weatherization specialists. Elevate Energy, a Chicago-based nonprofit, coordinates several efficient incentive programs with utilities and contractors that could provide resources in partnership with County rehabilitation programs.

How are the actions listed above integrated into housing policies and procedures?

DPH indicated in an interview that LBP remediation programs have been successfully implemented in partnership with the Cook County Department of Environment and Sustainability's (DES) Healthy Homes for Healthy Families program. This program allocates County funding to make home improvements at no cost to residents for energy efficiency improvements, mold remediation, weatherization, and other repairs. When applicants also qualify for LBP remediation programs, home improvement work can be done in conjunction with other improvements through Healthy Homes for Healthy Families and increase the number of households reached through both programs.

DPD will incorporate LBP and radon testing and mitigation requirements into its housing rehabilitation programs and ensure that related requirements (based on assumptions of lead and asbestos in pre-1978 structures) and mitigation/abatement protocols are appropriately reflected in funding application forms, policies, procedures, and written agreements. DPD will also reiterate the requirements during pre-construction meetings and on-site construction monitoring. DPD will stringently enforce related requirements.

SP-70 Anti-Poverty Strategy – 91.215(j)

Jurisdiction Goals, Programs and Policies for reducing the number of Poverty-Level Families

DPD will target its limited resources to the lowest-income households with the goal of increasing access to economic opportunity and alleviating poverty. Priority populations include low-income households earning less than 50% AMI and extremely low-income households earning less than 30% AMI.

Overall, Cook County has a poverty rate of 13.4%, slightly higher than the national poverty rate of 12.5%. While the poverty rate is lower in Suburban Cook County (9.5%) than in Chicago (16.9%), over 230,000 Suburban Cook County households live in poverty (ACS 2018-2022 5-Year Estimates). Given the higher poverty rate in Chicago, limited nonprofit and philanthropic funding are often focused on the city, leaving fewer resources to address the needs of suburban households facing poverty-related challenges. In addition to leveraging federal, state, and local resources to combat poverty, DPD will coordinate with partner organizations to attract more private and philanthropic resources to Suburban Cook County.

To increase access to economic opportunity and reduce the number of poverty-level families, DPD will invest in and support projects, programs, policies, and capacity-building measures that address the geographic mismatch between jobs and affordable housing, reduce barriers to employment, and support economic growth in areas with limited historic investment. Education is key to increasing access to economic opportunities. DPD will support and incentivize affordable housing investment in close proximity to schools, from preschool through trade school and college. To build connections between jobs and housing, DPD will support and incentivize local investments in affordable housing in areas with strong access to jobs, transit, community amenities and other assets, with a particular focus on housing for residents with incomes under 60% AMI.

To address barriers to employment, DPD will facilitate connections between workforce development providers and underserved populations or those facing barriers to employment, increase workforce development funding available to local businesses that provide jobs to communities facing barriers to employment, and work with service providers to reduce friction points that challenge collaboration between organizations, job seekers and businesses.

To support economic growth in areas with limited historic investment, DPD will focus efforts on business development, capital access, policy reform, and coordination with partner organizations. This includes attracting businesses and focusing economic development investments in areas with an available workforce and fewer existing employment opportunities, improving access to capital for small and first-generation businesses to reduce barriers to business formation, market entry, and growth, and investing in business development initiatives that create meaningful job opportunities in areas of high unemployment. DPD will also work with other County entities to implement property tax reforms to promote business retention and development, and limit the degree to which reduced assessments for highly vacant properties disincentivize investment.

How are the jurisdiction's poverty reducing goals, programs, and policies coordinated with this affordable housing plan?

The strategies outlined in this plan align with the broader goals of the Cook County Policy Roadmap and BED Strategic Plan. DPD resources will be coordinated to create or enhance economic opportunities for and alleviate poverty among its most vulnerable residents. Related efforts will be coordinated internally to ensure that economic, community, and housing development programming is appropriately targeted and strategically leveraged to improve local conditions.

SP-80 Monitoring – 91.230

Describe the standards and procedures that the jurisdiction will use to monitor activities carried out in furtherance of the plan and will use to ensure long-term compliance with requirements of the programs involved, including minority business outreach and the comprehensive planning requirements

Several DPD staff are responsible for ensuring internal programmatic and financial compliance with all required provisions. Annual audits further inform these processes. Externally, DPD monitors funding recipients' use of dollars. Agencies operating programs on behalf of the County or providing professional services are monitored at least annually to confirm fiscal compliance. Funding recipients carrying out construction activities for housing, infrastructure, or public facilities are monitored over the course of construction, often along with construction draw requests. This monitoring confirms that work is progressing appropriately and that funds requested directly tie to work completed. Construction oversight staff monitor remotely and on-site to ensure appropriate adherence to relocation, LBP, Davis Bacon, Section 3, and other requirements. Non-construction activities are monitored annually to ensure administrative compliance and appropriate beneficiary data reporting. Transition to a more formal risk analysis system is currently being explored by program. As DPD's current internal policies and procedures manual spans several hundred pages, it is not attached or summarized in detail here. However, it has been previously shared with HUD in print and electronic forms and can be re-sent upon request.

Annual Action Plan (AP)

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

Introduction

This draft Consolidated Plan (Con Plan) reflects the wide array of funding sources the County will utilize to support implementation. Beyond its annual entitlements (i.e., Community Development Block Grant (CDBG), HOME Investment Partnerships (HOME), and Emergency Solutions Grants (ESG)), the County expects the other primary sources of funds to support this plan will include corporate funds, a CDBG-DR grant, and a CDBG-CV grant from the State of Illinois.

Cook County will utilize its corporate funds on an as needed basis to support department operations, particularly associated with staffing for business and workforce development, as well as planning and administration.

Due to severe flooding in Cook County in 2023 and 2024, the County has been awarded \$244 million in disaster relief funds to advance flood and disaster recovery efforts in areas of unmet need. The County is currently in the process of completing the required Action Plan for the \$244 million dollar CDBG-DR grant.

The County plans to utilize \$4 million in remaining CDBG-CV funding from the State of Illinois to rehabilitate fixed-site shelters at Margarita Inn and Aloha Motel.

The use of the remaining funding will be consistent with this draft Annual Action Plan. DPD administers several economic development programs, and those programs will also support this draft Annual Action Plan. Over the five-year period covered by the Con Plan, approximately \$333 million in core resources is expected to leverage almost \$335 million in additional public, private, and philanthropic funding based on the County's historic funding patterns. The County intends to continue advocating for private and philanthropic funding participation to address key community and economic needs.

Beyond these core resources, the County will seek additional funds to support plan implementation. Additional funds may include matching funds; funding from the Economic Development Administration; Low Income Housing Tax Credits (LIHTC); New Markets Tax Credits (NMTC); Choice Neighborhoods grants; and the pursuit of other grants.

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of Con Plan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	Public-federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	10,516,157	0	0	10,516,157	42,000,000	Community Development Block Grant (CDBG) funds support business & workforce development, infrastructure & public facilities, housing development & services, non- housing services, and planning & administration activities. The stated allocation for CDBG is an estimate and will be updated once the County receives the official allocation letter from the Department of Housing and Urban Development.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of Con Plan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
HOME	Public-federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	5,777,500.17	6,700,000	0	12,477,500.17	22,800,000	HOME Investment Partnerships Program (HOME) funds support housing development & services and administration activities. The stated allocation for HOME is an estimate and will be updated once the County receives the official allocation letter from the Department of Housing and Urban Development.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of Con Plan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
ESG	Public-federal	Rapid Rehousing Homeless Person Overnight Shelter Homeless Prevention Rental Assistance	848,353	0	0	848,353	3,400,000	Emergency Solutions Grant (ESG) funds support housing services, non-housing services, and administration activities. The stated allocation for ESG is an estimate and will be updated once the County receives the official allocation letter from the Department of Housing and Urban Development.

Table 1 - Expected Resources – Priority Table

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

ESG funding recipients will provide a 1:1 match. HOME funding recipients will be required to demonstrate eligible match resources at or above the 25% threshold requirement. Typically, HOME funding contributes 10% of overall project costs, delivering an 8:1 average lever on HOME funds.

CDBG funds do not explicitly require a match; however, DPD is beginning to track related data and may impose a specific match as a requirement in the future. Additional limited corporate funds or corporate tax incentives may also be deployed to achieve the goals of the Con Plan. Based on historic funding patterns, an estimated \$333 million in core resources over the five-year period has the potential to leverage an additional \$335 million in public, private, and philanthropic funding.

The Alliance to End Homelessness (the Alliance), which manages the Continuum of Care in Suburban Cook County, receives additional direct funding from HUD. The Alliance is awarded approximately \$16 million per year to support approximately 30 housing programs for people experiencing homelessness across Suburban Cook County. While these dollars do not flow directly through DPD, they are largely directed towards similar goals and DPD will continue to partner with the Alliance to ensure all available resources are appropriately leveraged to meet critical needs. These dollars as well as other Alliance resources are estimated to total \$71 million over the five-year period.

Beyond these core resources and associated leveraging, DPD will continue to pursue other competitive funding opportunities through public and private sources. Moreover, DPD continues to coordinate with other jurisdictions in the region to explore opportunities for information and resource sharing and general collaboration given shrinking administrative resources. DPD is also planning to implement its \$244 million CDBG-DR grant, and many of the CDBG-DR projects will leverage significant additional resources from other entities. The County plans to utilize \$4 million in remaining CDBG-CV funding from the State of Illinois to rehabilitate fixed-site shelters at Margarita Inn and Aloha Motel. The Housing Authority of Cook County will contribute project-based vouchers for various residential projects. Private resources will be leveraged to both HOME and ESG programming.

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

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

Discussion

Anticipated CDBG, ESG and HOME funds, in conjunction with CDBG-DR and other federal, state and local funds, will leverage significant private investment in Suburban Cook County to accomplish the stated

objectives in housing and homelessness, community development, economic development, workforce development, infrastructure and planning and administration.

AP-20 Annual Goals and Objectives

Goals Summary Information

Goal Name	Start Year	End Year	Outcome	Objective	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
Housing and Homelessness	2025	2029	Affordability	Provide decent affordable housing	Affordable Housing Public Housing Special Needs	South Suburban Cook County West Suburban Cook County Suburban Cook County CDBG Priority Area HOME Consortium	Housing and Homelessness Community Development Economic Development Workforce Development Infrastructure Planning and Administration	HOME: \$11,899,750.17 ESG: \$784,726.53	Rental units constructed: 410 units Rental units rehabilitated: 30 units Tenant-based rental assistance / Rapid Rehousing: 50 Households Assisted Homeless Person Overnight Shelter: 1000 Persons Assisted Homelessness Prevention: 100 Persons Assisted

Goal Name	Start Year	End Year	Outcome	Objective	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
Community Development	2025	2029	Availability/ Accessibility	Create economic opportunities	Homeless Non-Homeless Special Needs	South Suburban Cook County West Suburban Cook County Suburban Cook County CDBG Priority Area HOME Consortium	Housing and Homelessness Community Development Economic Development Workforce Development Infrastructure Planning and Administration	CDBG: \$1,577,423	Public service activities other than Low/Moderate Income Housing Benefit: 15,000 Persons Assisted

Goal Name	Start Year	End Year	Outcome	Objective	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
Economic Development	2025	2029	Availability/ Accessibility	Create economic opportunities	Non-Housing Community Development	South Suburban Cook County West Suburban Cook County Suburban Cook County Suburban Cook County CDBG Priority Area HOME Consortium	Housing and Homelessness Community Development Economic Development Workforce Development Infrastructure Planning and Administration	CDBG: \$22,500	Public service activities other than Low/Moderate Income Housing Benefit: 75 Persons Assisted

Goal Name	Start Year	End Year	Outcome	Objective	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
Workforce Development	2025	2029	Availability/ Accessibility	Create economic opportunities	Non-Housing Community Development	South Suburban Cook County West Suburban Cook County Suburban Cook County Suburban Cook County CDBG Priority Area HOME Consortium	Housing and Homelessness Community Development Economic Development Workforce Development Infrastructure Planning and Administration	CDBG: \$22,500	Public service activities other than Low/Moderate Income Housing Benefit: 75 Persons Assisted

Goal Name	Start Year	End Year	Outcome	Objective	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
Infrastructure	2025	2029	Sustainable	Create economic opportunities	Non-Housing Community Development	South Suburban Cook County West Suburban Cook County Suburban Cook County CDBG Priority Area HOME Consortium	Housing and Homelessness Community Development Economic Development Workforce Development Infrastructure Planning and Administration	CDBG: \$6,790,503	Cities and Villages Assisted: 25 Businesses Assisted: 5 Businesses assisted

Goal Name	Start Year	End Year	Outcome	Objective	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
Planning and Administration	2025	2029	Sustainability	Create economic opportunities	Planning and Admin	South Suburban Cook County West Suburban Cook County Suburban Cook County CDBG Priority Area HOME Consortium	Housing and Homelessness Community Development Economic Development Workforce Development Infrastructure Planning and Administration	CDBG: \$2,103,231 HOME: \$577,750	

Table 60 – Goals Summary

Goal Descriptions

1	Goal Name	Housing and Homelessness
	Goal Description	<p>Goal: Provide a continuum of quality, affordable housing for all.</p> <p>Objectives: 1.1 Develop and increase funding and its flexibility for affordable housing types, ensuring investments are community-driven and maximize impact. 1.2 Transform the County's services for the unhoused to achieve housing security for our most vulnerable residents. 1.3 Fund programs and provide capacity building support to improve housing outcomes and build economic opportunity. 1.4 Support enhanced housing education, communications, and advocacy efforts. 1.5 Support environmental sustainability and positive health outcomes through housing investments and policies.</p> <p>The HOME funding allocation for Housing and Homelessness is \$11,899,750,17, including \$5,199,750.17 from the HOME Investment Partnerships Grant and \$6,700,000 from HOME Program Income. Of the \$848,353 in ESG funds, \$63,626.47 will be used for ESG Planning and Administration, and the remaining \$784,726.53 will be applied to projects for Housing and Homelessness.</p>
2	Goal Name	Community Development
	Goal Description	<p>Goal: Build healthy, connected, and sustainable communities where all residents have access to services and amenities.</p> <p>Objectives: 2.1 Foster a community-centered approach to implement community development and economic revitalization that supports fair access to opportunity for all. 2.2 Proactively address negative environmental conditions. 2.3 Promote policies and partnerships that support expanded healthcare access and improved health outcomes for vulnerable residents. 2.4 Facilitate and invest in comprehensive and coordinated approaches to proactively address violence and improve safety in highly impacted communities.</p> <p>DPD anticipates allocating \$1,577,423 of CDBG funds for Community Development under this draft 2025 Annual Action Plan.</p>

3	Goal Name	Economic Development
	Goal Description	<p>Goal: Foster inclusive, resilient economic growth that creates opportunities for all residents and businesses to thrive.</p> <p>Objectives: 3.1 Champion a regional approach to grow the economy and advance economic opportunity for all. 3.2 Invest in economic sectors with good jobs and positive economic, environmental and social impact. 3.3 Grow the small business ecosystem, support innovation and entrepreneurship, and reduce wealth gaps. 3.4 Promote environmental sustainability in economic development initiatives. 3.5 Base investments on their capacity to promote fair economic growth.</p> <p>DPD anticipates allocating \$22,500 of CDBG funds for Economic Development under this draft 2025 Annual Action Plan.</p>
4	Goal Name	Workforce Development
	Goal Description	<p>Goal: Promote pathways to good jobs that support economic mobility for residents and meet the needs of employers.</p> <p>Objectives: 4.1 Align investments and incentives to intentionally support fair access to high-quality jobs that promote economic mobility. 4.2 Foster partnerships between employers, workforce service providers and job seekers. 4.3 Strengthen internal County processes and policies to support current workers, job seekers and workforce partners.</p> <p>DPD anticipates allocating \$22,500 of CDBG funds for Workforce Development under this draft 2025 Annual Action Plan.</p>

5	Goal Name	Infrastructure
	Goal Description	<p>Goal: Leverage infrastructure investments to promote resiliency, accessibility and economic growth.</p> <p>Objectives: 5.1 Base investments on their capacity to promote fair economic growth. 5.2 Promote sustainability in infrastructure to guard against natural disasters and build resilience. 5.3 Increase regional accessibility and connectivity by investing in sustainable infrastructure throughout Cook County. 5.4 Implement a coordinated approach to pursuing available funding to support new construction and existing infrastructure needs.</p> <p>DPD anticipates allocating \$6,790,503 of CDBG funds for Infrastructure under this draft 2025 Annual Action Plan.</p>
6	Goal Name	Planning and Administration
	Goal Description	<p>Goal: Continue to develop an institutional framework, processes, and interdepartmental collaboration within Cook County, to support multi-jurisdictional collaboration, improved local capacity, and transparency.</p> <p>DPD anticipates allocating \$2,103,231 in total CDBG funds to Planning and Administration, including \$2,058,231 for CDBG Administration and \$45,000 for CDBG Planning. The HOME Planning and Administration Total is \$577,750.00.</p>

AP-35 Projects – 91.220(d)

Introduction

This draft 2025 Annual Action Plan summarizes the proposed programs, projects, and special initiatives that DPD will implement during the first year of the Con Plan. Projects are tied to the Con Plan’s goals, strategies and priorities which aim to address specific and current needs supported by extensive data analysis and public/stakeholder input. The project summary below details anticipated sources and uses of funding. A discussion and current updated project information for the Cook County CDBG-DR grant can be found at the following link <https://www.cookcountyil.gov/service/disaster-recovery-and-resilience>. The Disaster Recovery Plan for the \$244 million allocation is currently in the process of completion. County priorities include activities related to remediation, acquisition, infrastructure, replacement housing, planning, and housing assistance as identified throughout the grant life cycle.

Projects

#	Project Name
1	Housing and Homelessness
2	Community Development
3	Economic Development
4	Workforce Development
5	Infrastructure
6	Planning and Administration

Table 2 – Project Information

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

Allocation priorities tie directly back to priorities and needs detailed in the draft Con Plan and reflected in the broader Uplift Cook planning initiative. Under the first year of the 2025-2029 Con Plan, DPD will further operationalize funding process and documentation improvements for enhanced plan alignment. Comprehensive data on local needs is detailed throughout the Con Plan, including the needs of traditionally underserved and vulnerable populations. The key obstacle to addressing these needs remains limited available financial resources. CDBG, ESG, and HOME funding have been reduced over the years, making it difficult to maintain the level of planning, development, and services required to address unmet needs. The County is continually exploring additional philanthropic, private, and government funding, partnerships, and internal restructuring options so that it can maximize the limited resources currently at its disposal.

The County’s CDBG-DR funding will supplement these efforts. DPD is focusing almost half of its CDBG-DR funding on infrastructure improvements to prevent or mitigate future flooding impacts. DPD is also conducting a range of housing activities under CDBG-DR, including buyouts of homes in the floodplain, resilient rehabilitation of disaster-impacted homes, and housing replacement efforts. Stormwater

planning efforts are also being supported in impacted communities. DPD's CDBG-DR Action Plan and related amendments can be found on the County's disaster recovery website: <https://www.cookcountyil.gov/service/disaster-recovery-and-resilience>.

AP-38 Project Summary

Project Summary Information

Project Name	Housing and Homelessness
Target Area	Suburban Cook County, CDBG Priority Area, HOME Consortium
Goals Supported	Housing and Homelessness, Community Development, Economic Development, Workforce Development, Infrastructure
Needs Addressed	Housing and Homelessness
Funding	HOME: \$11,899,750.17; ESG: \$784,726.53
Description	<p>Goal: Provide a continuum of quality, affordable housing for all.</p> <p>Objectives: 1.1 Develop and increase funding and its flexibility for affordable housing types, ensuring investments are community-driven and maximize impact; 1.2 Transform the County's services for the unhoused to achieve housing security for our most vulnerable residents; 1.3 Fund programs and provide capacity building support to improve housing outcomes and build economic opportunity; 1.4 Support enhanced housing education, communications, and advocacy efforts; 1.5 Support environmental sustainability and positive health outcomes through housing investments and policies.</p> <p>HOME funds will be utilized for the support of housing development activities through qualified developers. Individual allocations will be specified in IDIS during activity setup. The \$11,899,750.17 for HOME is a combination of the following: Program Income of \$6,700,000 and \$5,199,750.17 in HOME Investment Partnerships Grant funding from the PY 2025 allocation. PY 2025 CHDO Set aside will be \$855,000. ESG funds will be used to support the provision of shelter, and service activities through various sub recipient agencies. Individual allocations will be specified in IDIS during activity setup that has been set aside to support the suburban Continuum of Care's Coordinated Entry System. The funding total for ESG Housing and Homelessness services is \$784,726.53. The funding total for ESG planning and administration is \$63,626.47.</p>

Target Date	9/30/2026
Estimate the number and type of families that will benefit from the proposed activities	Rental units constructed: 410 units Rental units rehabilitated: 30 units Tenant-based rental assistance / Rapid Rehousing: 50 Households Assisted Homeless Person Overnight Shelter: 1,000 Persons Assisted Homelessness Prevention: 100 Persons Assisted
Location Description	Throughout Suburban Cook County.
Planned Activities	Support of housing development activities through qualified developers using HOME funds and the support of provision of shelter and service activities through various sub recipient agencies using ESG funds. Individual allocations will be specified in IDIS during activity setup.
Project Name	Community Development
Target Area	South Suburban Cook County, Suburban Cook County, CDBG Priority Area
Goals Supported	Community Development, Housing and Homelessness, Economic Development, Workforce Development, Infrastructure
Needs Addressed	Community Development
Funding	CDBG: \$1,577,423
Description	Goal: Build healthy, connected, and sustainable communities where all residents have access to services and amenities. Objectives: 2.1 Foster a community-centered approach to implement community development and economic revitalization that supports fair access to opportunity for all; 2.2 Proactively address negative environmental conditions;2.3 Promote policies and partnerships that support expanded healthcare access and improved health outcomes for vulnerable residents;2.4 Facilitate and invest in comprehensive and coordinated approaches to proactively address violence and improve safety in highly impacted communities.
Target Date	9/30/2026
Estimate the number and type of families that will benefit from the proposed activities	Public service activities other than Low/Moderate Income Housing Benefit: 15,000 Persons Assisted

Location Description	Throughout Suburban Cook County.
Planned Activities	Support of public service activities through subrecipient agencies.
Project Name	Economic Development
Target Area	South Suburban Cook County, Suburban Cook County, CDBG Priority Area
Goals Supported	Economic Development, Housing and Homelessness, Community Development, Workforce Development, Infrastructure
Needs Addressed	Economic Development
Funding	CDBG: \$22,500
Description	<p>Goal: Foster inclusive, resilient economic growth that creates opportunities for all residents and businesses to thrive.</p> <p>Objectives: 3.1 Champion a regional approach to grow the economy and advance economic opportunity for all; 3.2 Invest in economic sectors with good jobs and positive economic, environmental and social impact; 3.3 Grow the small business ecosystem, support innovation and entrepreneurship, and reduce wealth gaps; 3.4 Promote environmental sustainability in economic development initiatives; 3.5 Base investments on their capacity to promote fair economic growth.</p>
Target Date	9/30/2026
Estimate the number and type of families that will benefit from the proposed activities	Public service activities other than Low/ Moderate Income Housing Benefit: 75 Persons Assisted
Location Description	Throughout Suburban Cook County.
Planned Activities	Support of economic development activities through various subrecipient agencies. Individual allocations will be specified during the activity setup in IDIS.

Project Name	Workforce Development
Target Area	South Suburban Cook County, Suburban Cook County, CDBG Priority Area
Goals Supported	Workforce Development, Housing and Homelessness, Community Development, Economic Development, Infrastructure
Needs Addressed	Workforce Development
Funding	CDBG: \$22,500
Description	<p>Goal: Promote pathways to good jobs that support economic mobility for residents and meet the needs of employers.</p> <p>Objectives: 4.1 Align investments and incentives to intentionally support fair access to high-quality jobs that promote economic mobility; 4.2 Foster partnerships between employers, workforce service providers and job seekers; 4.3 Strengthen internal County processes and policies to support current workers, job seekers and workforce partners.</p>
Target Date	9/30/2026
Estimate the number and type of families that will benefit from the proposed activities	Public service activities other than Low/Moderate Income Housing Benefit: 75 Persons Assisted
Location Description	Throughout Suburban Cook County.
Planned Activities	Support of workforce development activities through various subrecipient agencies. Individual allocations will be specified during the activity setup in IDIS.
Project Name	Infrastructure
Target Area	South Suburban Cook County, Suburban Cook County, CDBG Priority Area
Goals Supported	Infrastructure, Housing and Homelessness, Community Development, Economic Development, Workforce Development
Needs Addressed	Infrastructure
Funding	CDBG: \$6,790,503

Description	Goal: Leverage infrastructure investments to promote resiliency, accessibility and economic growth. Objectives: 5.1 Base investments on their capacity to promote fair economic growth; 5.2 Promote sustainability in infrastructure to guard against natural disasters and build resilience; 5.3 Implement a coordinated approach to pursuing available funding to support new construction and existing infrastructure needs.
Target Date	9/30/2026
Estimate the number and type of families that will benefit from the proposed activities	Public service activities other than Low/Moderate Income Housing Benefit: 75 Persons Assisted
Location Description	Throughout Suburban Cook County.
Planned Activities	Support of capital improvement infrastructure activities through subrecipient agencies. Individual allocations will be specified in IDIS during activity setup.
Project Name	Planning and Administration
Target Area	N/A
Goals Supported	Planning and Administration, Housing and Homelessness, Community Development, Economic Development, Workforce Development, Infrastructure
Needs Addressed	Planning and Administration
Funding	CDBG: \$2,103,231; HOME: \$577,750
Description	CDBG Administration Total is \$2,058,231 and the CDBG Planning Total is \$45,000. The HOME Planning and Administration Total is \$577,750.
Target Date	9/30/2026
Estimate the number and type of families that will benefit from the proposed activities	N/A

Location Description	Countywide, but based in the County Office at 69 W. Washington, Chicago, IL
Planned Activities	Support of administration and planning activities.

AP-50 Geographic Distribution – 91.220(f)

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

Cook County serves as the lead entity for the Cook County Urban County, which includes unincorporated Cook County and all municipalities in Cook County except: Arlington Heights, Berwyn, Chicago, Cicero, Des Plaines, Evanston, Hoffman Estates, Mount Prospect, Oak Park, Palatine, Schaumburg, and Skokie. Cook County also serves as the lead entity for the Cook County HOME Consortium which currently includes all municipalities in Cook County except Chicago and Evanston. This 2025 Annual Action Plan is only applicable to the current jurisdictional boundaries of the Cook County Urban County and HOME Consortium. DPD estimates 61% of the funds will be allocated towards the South Suburban Cook County. The remaining 39% will be allocated to the remaining areas in Suburban Cook County.

Geographic Distribution

Target Area	Percentage of Funds
South Suburban Cook County	61
West Suburban Cook County	
Suburban Cook County	39
CDBG Priority Area	
HOME Consortium	

Table 3 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

An important component of the Con Plan and this corresponding draft 2025 Annual Action Plan is strategically targeting County investments to specific geographies. While the draft Con Plan’s goals are designed to stimulate economic growth and fair allocation of resources throughout Cook County, particular types of investment are preferred for certain geographies given the underlying market conditions.

In alignment with these allocation priorities and analysis, a significant percentage of DPD’s HUD funding will be directed toward economic development, workforce development, housing, infrastructure, and community development efforts in South Suburban Cook County. DPD will continue its focus on the revitalization of the southern suburbs via the South Suburban Economic Growth Initiative and the recently formed Southland Development Authority. Resources will also be targeted to Suburban Cook County overall, including West Suburban Cook County, the HOME Consortium, and CDBG Priority Area. To stimulate economic growth and address core housing needs across South Suburban Cook County, there are opportunities for investments in residential construction and preservation, economic development, infrastructure, workforce development, and public services. Needs relevant to Suburban Cook County overall include transportation infrastructure, public services, affordable housing development,

preservation of existing older housing stock, workforce development, and economic development.

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

Discussion

The PY2025 Subrecipient list is forthcoming.

AP-55 Affordable Housing – 91.220(g)

Introduction

Housing affordability is one of the most pressing challenges in Suburban Cook County. There is a lack of affordable housing for households at the lowest income levels, driven primarily by limited residential construction, rapidly increasing home values and rents, and property tax pressures. Approximately 64% of Suburban Cook County households making under \$75,000 are housing cost burdened, compared to only 9% of households making over \$75,000 (ACS 2018-2022 5-Year estimates). Aging housing stock in need of repair and probable lead-based paint abatement also increases costs for existing households and can result in the loss of naturally occurring affordable housing if not remedied. Identifying opportunities to create new units of affordable housing and preserve existing housing is critical.

There are geographic distinctions as well, as local housing markets reflect historic development trends, patterns of investment and disinvestment, and regulatory environments. Compared to the jurisdiction overall, portions of South Suburban Cook County are characterized by lower property and home values, limited recent commercial investment, and aging infrastructure and housing stock. Despite lower base values, rapidly rising property values in recent years have increased costs significantly for existing homeowners, placing financial pressures on low-income and fixed-income households. Older homes built prior to 1950 are concentrated in the inner ring western suburbs. Inner ring suburbs also tend to be more densely populated than other areas, with a prevalence of 2–4-unit buildings and some larger buildings. Rents and home values in West Suburban Cook County are generally moderate compared to the county overall; however, some west suburban municipalities have experienced rapidly increasing home values in recent years. Existing affordable housing in the county is mostly concentrated in South Suburban Cook County and is more limited in the north and west suburbs.

Residents experiencing homelessness and special needs populations also have unique needs related to affordable housing. Continually increasing costs of housing and other necessities such as childcare, eldercare, transportation, and food have led to increases in the number of individuals and families experiencing or at risk of homelessness. Affordable housing is a core need across all special need groups, many of whom are lower income, experience health challenges, and may be at an increased risk of

homelessness.

To address these needs, DPD will deploy its HOME funding to support affordable housing development including single, and multi-family housing and to meet the needs of current or prospective homebuyers, homeowners, or renters. ESG funds will be used to support the provision of shelter, and service activities through various sub recipient agencies. In the south suburbs, resources will leverage funding from other investors to build new state-of-the-art affordable housing for seniors and other vulnerable populations to ensure that a stock of new affordable units exists as these areas revitalize. In the north and west suburbs, funds will likely emphasize preserving the stock of affordable housing. DPD will work with the Housing Authority of Cook County to encourage greater access to housing in these communities through available vouchers. DPD will also continue to support affordable housing development that serves special needs groups including but not limited to permanent supportive housing projects county-wide.

Collaboration and coordination with the local public housing authorities including HACC, the Continuum of Care (CoC), and municipal members of the Cook County HOME Consortium will be ongoing to ensure proposed developments appropriately meet local needs and help enable or enhance access to affordable housing.

One Year Goals for the Number of Households to be Supported:	
Homeless	170
Non-Homeless	229
Special-Needs	41
Total	440

Table 4 - One Year Goals for Affordable Housing by Support Requirement

One Year Goals for the Number of Households Supported Through:	
Rental Assistance	0
The Production of New Units	410
Rehab of Existing Units	30
Acquisition of Existing Units	0
Total	440

Table 5 - One Year Goals for Affordable Housing by Support Type

Discussion

DPD maintains a robust pipeline of eligible HOME projects which is continually evolving. HOME funds are often provided as gap financing, and most projects are contingent upon other public and private funding resources. As the HOME funding application cycle is rolling, with applications accepted throughout the year, DPD brings projects to the Cook County Economic Development Advisory Committee (EDAC) and/or Cook County Board for individual review and consideration for approval after eligibility review and underwriting have been completed. These meetings also function as public hearings and offer an

opportunity for public comment on proposed projects. DPD also requires that proposed projects have local community and municipal support before providing formal approval.

While each municipal HOME Consortium member receives their own direct allocation of CDBG and/or ESG funding from HUD and develops their own Con Plan and corresponding Annual Action Plan for that purpose, DPD continues to coordinate with them regarding the proposed deployment of HOME funding to address affordable housing needs throughout suburban Cook County. If a proposed project is located within the jurisdiction of a current HOME Consortium member, additional consultation occurs to ensure the proposal is aligned with local needs and priorities.

HUD recently released policy guidance regarding a new protocol (Grant Based Accounting) regarding HOME funding commitment and expenditures which previously operated on a “first in, first out” (FIFO) protocol. These changes ensure that IDIS both commits and disburses funds on a grant specific basis, instead of using the FIFO (oldest money disbursed first) method that has been used for the CDBG, HOME, and Housing Opportunities for Persons with AIDS (HOPWA) programs to date. Grant funds were already committed and disbursed in IDIS on a grant-specific basis for the ESG program. In light of this guidance, DPD is currently reevaluating its pipeline to determine which projects are most suitable for funding with 2025 dollars to ensure compliance with these new requirements. For these reasons, as well as the fact that the County has four years to commit and five years to expend HOME funds, a detailed 2025 HOME funding project list is not included at this time. However, as the County updates and refines this pipeline, it will consult and coordinate with HOME Consortium members as appropriate and keep HUD sufficiently informed as to the proposed usage of related dollars, including but not limited to 2025 funds.

Specific CDBG-DR housing goals are regularly updated through the County's CDBG-DR action plan as found here <https://www.cookcountyil.gov/service/disaster-recovery-and-resilience>. There are no current updates to Housing goals. Cook County DPD intends to produce 41 units of Permanent Supportive Housing utilizing ARPA Funds. In addition, DPD intends to produce 150 units of shelter (100 units in the next fiscal year and 50 in the following one) utilizing State CDBG-CV funds.

AP-60 Public Housing – 91.220(h)

Introduction

Collectively, the Housing Authority of Cook County (HACC), Oak Park Housing Authority (OPHA) and Housing Authority of Park Forest (HAPF) subsidize 15,056 units of housing. Of these units, 3% (461) are public housing units owned and managed by the housing authorities and 10% (1,477) operate with project-based voucher rental assistance. The remaining 87% encompasses Housing Choice Vouchers (HCVs) held by residents, including allocations of Special Purpose Vouchers (SPVs) for target populations.

DPD consulted frequently with local housing authorities in the development of the draft Con Plan and draft Annual Action Plan. Related consultations included information and data sharing related to current needs, capacity to fulfill related needs through physical housing unit provision, rental assistance, and

provision of other services. DPD and HACC are strong partners and collaborate often around programming and funding opportunities. Leadership of the entities collaborate to discuss needs, available resources, and coordination opportunities. HACC is informed of County-funded affordable housing developments as they come online for client referral purposes, and the County can refer individuals in need of housing assistance to HACC. Several County-funded projects also have HACC project-based vouchers or are participants in the Rental Assistance Demonstration (RAD) program, which allows HACC to utilize private debt to finance renovation of existing public housing.

Both DPD and HACC coordinate and partner with the local CoC through the Alliance to End Homelessness in Suburban Cook County to ensure that persons who are homeless or at risk of homelessness can access housing authority resources where eligible. DPD and HACC have also partnered on various competitive funding applications to bring additional resources to Cook County. Through implementation of both the 2025-2029 Con Plan and this corresponding 2025 draft Annual Plan, DPD will work diligently to forge equally strong relationships with the other housing authorities.

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

DPD is exploring coordination opportunities related to integrated Section 3, Minority- and Women-owned Business Enterprise (MBE/WBE) compliance which aim to ensure access to contractual opportunities for historically excluded businesses and individuals. Information sharing or a common database of eligible and/or certified businesses and people could help to create significant employment opportunities for low-income and minority residents, thereby improving job access, as well as facilitating improved compliance with HUD requirements. DPD has already initiated related consultations with prospective partners including HACC, the Chicago Housing Authority (CHA), the Chicago Cook Workforce Partnership, and City of Chicago around potential coordination. These consultations are expected to continue in PY 2025.

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

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

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

This item is not applicable as none of the housing authorities located within Cook County boundaries are

designated as troubled to DPD's knowledge.

Discussion

A more robust discussion of public housing authority related needs, strategies, and coordination opportunities is provided in the draft 2025-2029 Con Plan.

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

Introduction

Cook County is committed to reducing and ending homelessness by implementing targeted strategies to support both emergency and long-term housing solutions. DPD works closely with the CoC to reach unsheltered individuals and assess their needs through coordinated outreach. The county continues to provide resources through the ESG program to support outreach, emergency shelter, and rapid rehousing. Efforts focus on helping vulnerable populations — including chronically homeless individuals, families with children, veterans, and unaccompanied youth — transition to permanent housing while reducing the length of time spent in homelessness. Additionally, Cook County remains dedicated to preventing homelessness through a coordinated entry system, supporting housing development, and ensuring individuals leaving institutional care have access to necessary housing and services.

Describe the jurisdiction's one-year goals and actions for reducing and ending homelessness including:

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

DPD supports specific homeless outreach activities through the CoC, a critical first step in connecting people experiencing chronic homelessness with the services they need and reducing the length of time they spend homeless. Outreach and engagement of people experiencing homelessness, especially the unsheltered, and assessment of their individual needs is incorporated in Cook County's ESG annual funding process. DPD coordinates closely with the CoC on outreach, including the use of the by-name list to identify and serve chronically homeless individuals. The by-name list is a comprehensive, real-time list of those experiencing homelessness, outlining their personal roadblocks to consistent housing. It coordinates data from homeless service providers to establish a common point of information on a single person's condition and needs. Suburban Cook County began implementation of the by-name list for veterans in May 2017 and expanded to include those experiencing chronic homelessness by November 2017. Expansion of the populations covered by this list would allow for better allocation of resources for those experiencing homelessness. DPD requires all ESG funding recipient agencies to involve homeless or formerly homeless persons in policy-making roles. The

level to which agencies involve residents who are experiencing or have formerly experienced homelessness affects their competitiveness in obtaining funding. DPD staff work with subrecipients to encourage agencies to enhance participation of people with lived experiences and provide technical assistance to ensure their successful involvement in policy roles. DPD will continue to support homeless outreach activities with ESG funding under this draft 2025 Annual Action Plan.

Addressing the emergency shelter and transitional housing needs of homeless persons

Under this draft 2025 Annual Action Plan, the County will aim to address the emergency shelter needs of homeless persons through the deployment of ESG resources to agencies that provide emergency shelter options and services.

Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again

Reducing the amount of time that individuals, families, the chronically homeless, veterans, and unaccompanied youth experience homelessness requires appropriate available housing, social services, and employment opportunities to support them. Secure housing is the most important need of homeless individuals and families. Without the stability and safety of consistent housing, it is difficult or impossible to meet work, family and healthcare needs. Therefore, increasing the range and number of affordable housing options in Suburban Cook County is the most important step to preventing and resolving homelessness.

To increase temporary housing options that provide a path to exiting homelessness, the County will continue to support rapid-rehousing assistance that helps participants quickly obtain and sustain stable housing through the ESG program. To increase permanent housing options for residents exiting the shelter system, the County will continue to provide funding for the development of affordable housing, including permanent supportive housing with onsite services. DPD will also continue to make linkages between persons in need of housing or housing assistance and available resources through the HOME and ESG programs. For example, information on available affordable housing units supported by the HOME program is made available to ESG staff that coordinate with the Alliance to disseminate related information. Additionally, the County will continue to partner with the Alliance to support their Suburban Cook County Built for Zero work, which aims to end veteran and chronic homelessness in Suburban Cook County.

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

DPD will also continue to partner with the Alliance to make sure prospective clients are referred to and provided housing and supportive services including those funded by CDBG, ESG, and HOME resources. To reduce gaps in services, Cook County and the Alliance are heavily focused on facilitating coordinated entry. DPD has dedicated resources over the last five years to support the development and implementation of a formal coordinated entry system in Suburban Cook County and will continue this support under this draft 2025 Annual Action Plan. This system helps people who are currently homeless or at imminent risk of homelessness access housing, services, and other resources.

Discussion

A more robust discussion of homeless-related needs, strategies, and coordination opportunities can be found in the MA and SP sections of the draft 2025-2029 Con Plan.

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

Introduction:

Barriers to affordable housing include market-driven factors and public policy and regulation. Market-driven barriers include the high — and rising — cost of construction, increases in building operating costs, and uncertainty over future costs. Barriers related to public policies and regulatory environments include the property tax assessment system, complicated financing structures and regulations for affordable housing, outdated and/or convoluted building codes, unclear or extended permitting and entitlement processes, and local resident opposition to new development. A full discussion of barriers to affordable housing is included in the SP section of the full draft 2025-2029 Con Plan.

Identifying barriers and developing related solutions is particularly challenging given that Suburban Cook County is home to over 130 municipalities, various townships, and other overlapping jurisdictions. Additionally, most municipalities are home-rule jurisdictions, limiting the County's ability to implement comprehensive policies and regulations. Most communities do not take a comprehensive, communitywide, strategic approach to land use and building codes, which can make assessing local regulatory barriers challenging.

Actions if planned to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment

The County is committed to advocating for public policy changes. The County intends to support reforming the property assessment and taxation system to reduce the disproportionate tax burden on lower-income homeowners and support business development, leveraging recent progress through the Southland Reactivation Act, the Cook County Affordable Housing Special Assessment Program, and other initiatives. The County will also identify opportunities to support municipal staff capacity and address local regulatory and policy impediments to affordable housing. These efforts are expected to include incentivizing local zoning reform by prioritizing County funding for municipalities that have taken steps to increase housing production; increasing education around the positive fiscal impacts of housing development; and building local capacity by providing sample zoning language and design guidelines to municipalities. Finally, the County will continue to advocate for statewide zoning and housing policy reform to increase availability of affordable units, and to increase education, publicity and coordination around state and federal funding sources.

In the near term, DPD is pursuing several strategies to mitigate barriers to affordable housing. Given its role as a taxing body, the County has formed a task force to reexamine the use and availability of commercial and residential tax incentives to help mitigate property tax-related costs while promoting economic growth. To address increased costs and barriers due to outdated and/or convoluted building code, the County recently updated and simplified its building code, which applies to unincorporated areas of the county. The updated code may also be adopted by municipal jurisdictions. The County is also exploring an inclusionary housing ordinance. It is expected that during the five-year Con Plan implementation process, Cook County will convene relevant stakeholders including public officials along with the real estate and development industries to explore this issue further.

Discussion:

A more robust discussion of barriers to affordable housing and strategies to combat them can be found in the MA and SP sections of the draft 2025-2029 Con Plan.

AP-85 Other Actions – 91.220(k)

Introduction:

Infrastructure remains a high priority. There is a significant need for infrastructure that promotes economic development and supports public and active transportation, including better maintained bus shelters, more bicycle lanes, and safer crosswalks. The overarching goal of such improvements should be to reduce automobile dependence, continue the shift towards transit-oriented development and connect people with jobs. In South Suburban Cook County, infrastructure projects are also aimed at attracting and

retaining businesses and jobs. Demand exists for skilled labor training and programs for all residents, with particular emphasis on serving low-income jobseekers, non-college bound youth, people with disabilities, women, veterans, and returning residents. Several programs are designed to help jobseekers obtain and retain employment in key and emerging industrial clusters. Strengthening workforce development near accessible transit and offering low-cost transportation options to areas of employment can help address the mismatch between jobs and housing. The County supports business development programs with additional targeting for small businesses (federally-defined as 500 employees or less), including entrepreneurial initiatives in low- and moderate- income communities and areas with high rates of unemployment. These efforts are supplemented with tax incentives and loans targeting business owners and operators within economically challenged areas.

The County's property tax structure remains a barrier to development, effectively encouraging businesses to locate outside of Cook County. While stakeholders discussed the importance of affordable housing, the best ways to make units available or affordable varied greatly. Numerous stakeholders brought up the mismatch between the location of affordable housing in the region and areas with access to employment. Some individuals noted that existing affordable housing is concentrated in southern suburbs and limited in northern and western suburbs. Respondents placed great importance on affordable housing development as a priority for the County, stressing that it should be targeted towards disadvantaged populations including low-income households earning less than 60% AMI, returning residents, seniors, people with disabilities, and unaccompanied youth. Complementary social services are needed that more effectively integrate with economic development strategies as well as supportive services linked with housing.

Actions planned to address obstacles to meeting underserved needs

There are a variety of underserved needs in Cook County that DPD aims to address through the strategies outlined in this draft 2025 Annual Action Plan and reflected in the broader draft 2025-2029 Con Plan and Uplift Cook planning initiative. The Con Plan and 2025 Annual Action Plan generally cover Suburban Cook County, excluding Chicago. DPD's funds will be allocated in alignment with the geographic priority areas as noted in the draft Strategic Plan. While some suburban municipalities receive their own entitlement funds directly from HUD and submit their own Consolidated Plans and Annual Action Plans, the County still coordinates with these communities. The Con Plan's strategic vision can aid all jurisdictions in determining what funding sources are appropriate to implement the desired programs and projects.

The 2025-2029 Consolidated Plan will be a living document whose principles are designed to address changing needs, demographics, market conditions, and resources. Using the tools available (namely taxation, regulation, and the provision of public investments and services), the County can address adverse market conditions and promote the public interest. Through its offices and departments, the County administers funds and tools such as infrastructure investments, property tax abatements, and federal grant programs. The County can also leverage its position as a major employer, purchaser, and property owner to further hiring, spending, and land development goals that align with the draft Con Plan's strategic priorities. A cohesive and coordinated planning effort will enable DPD to deploy federal funding more efficiently to meet countywide needs and position the County for long-term, fair, and

sustainable economic growth.

Actions planned to foster and maintain affordable housing

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

Actions planned to reduce lead-based paint hazards

A significant portion of the housing stock in Suburban Cook County was constructed prior to 1980. As such, this housing is presumed to contain lead-based paint, a public health hazard that can be particularly dangerous for small children. Due to historic patterns of development, inner-ring suburbs face the biggest challenges in this regard as they contain some of the County's oldest housing stock. While most older units require rehabilitation, low-income households may be less able to financially address rehabilitation needs. DPD will prioritize these areas for investments in rehabilitation and remediation of lead-based paint hazards to support low-income households, including those with children.

In developing the draft Con Plan, the Project Team engaged with Cook County Health, which has served the people of Cook County for more than 180 years and has a proud legacy as a leader in advancing health care. Cook County Health operates the Cook County Department of Public Health (DPH), the state-certified and nationally-accredited public health agency with jurisdiction over Cook County except for Chicago, Evanston, Oak Park, Skokie, and Stickney Township. DPH offers an array of services to address lead-based paint (LBP) hazards through its Healthy Homes and Lead Paint Hazard Grant Program. In Suburban Cook County, DPH visits any children with blood test results of 5 micrograms per deciliter ($\mu\text{g}/\text{dL}$) or higher and provides an in-home inspection to determine if there is lead-based paint present, as well as a home visit by a public health nurse. Through partnerships with the Community and Economic Development Association (CEDA), City of Chicago Department of Public Health, Evanston Health Department, and Illinois Department of Public Health, DPH also provides funding and technical assistance to qualified landlords to correct LBP hazards.

Funding is also available for local governments and non-profit organizations to expand programs to control LBP hazards in eligible housing. DPD and DPH will continue to coordinate to explore competitive funding opportunities related to LBP outreach/education, hazard reduction, and remediation. DPD seeks to provide funding to program operators with knowledge of and demonstrated capacity to work with other rehabilitation resources, including the County's LBP and radon testing programs, and energy efficiency programs operated by private and nonprofit partners. Operators must indicate how they will incorporate the best practices associated with HUD's Healthy Homes program, reducing environmental

hazards in rehabilitated units.

DPD incorporates LBP requirements into its housing rehabilitation programs to ensure compliance with related requirements regarding assumptions of lead and asbestos in pre-1978 structures. Mitigation/abatement requirements are reflected in funding application forms, policies and procedures, and written agreements. DPD will ensure that these requirements are articulated early and clearly and will facilitate compliance throughout project development.

Actions planned to reduce the number of poverty-level families

Cook County is no exception to the national trend of the increasing suburbanization of poverty as noted by Brookings and as highlighted in the book *Confronting Suburban Poverty in America*. DPD will target its limited resources to the lowest income households, with the goal of increasing access to economic opportunity and alleviating poverty. Priority populations include low-income households earning less than 50% AMI and extremely low-income households earning less than 30% AMI. To increase access to economic opportunity and reduce the number of poverty-level families, DPD will invest in and support projects, programs, policies, and capacity-building measures that address the geographic mismatch between jobs and affordable housing, reduce barriers to employment, and support economic growth in areas with limited historic investment. The County continues to partner with the Chicago Cook Workforce Partnership to connect employers and job seekers as gainful employment can play a significant role in poverty reduction. Additionally, all of DPD's programs and projects supported by CDBG, ESG, or HOME funds are intended to improve the economic, social, and housing outcomes for low and moderate-income beneficiaries which can help alleviate poverty.

Actions planned to develop institutional structure

DPD will continue to work with other stakeholders including the CoC and its membership, local housing authorities, regional planning organizations, non-profit service providers, local jurisdictions, the business community, and other partners to reinforce existing institutional structures and create new frameworks for coordination. In the aftermath of the COVID-19 pandemic, the County and its partners were successful in coming together to form a coordinated response to the crisis. Continuing to build on this progress helps ensure that low-income and other vulnerable populations can benefit from coordinated investment, development, planning, and service offerings.

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

Suburban Cook County utilizes a coordinated entry system as a single point of entry to the various services provided by the County and nonprofit service providers, including food, housing, utility assistance, and other needs. A resident may access the coordinated entry system by going to an Entry Point location (often a nonprofit partner), by referral from a healthcare provider after receiving care, or by calling "211" to speak with a client navigator or representative that assesses their immediate needs. The "211" hotline covers all of Cook County. Since launching in January 2023, the "211" program has been extremely successful method for coordination between public and private housing and social service agencies and

residents. By fall 2024, “211” provided over 250,000 referrals to over 125,000 contacts.

Discussion:

Across Suburban Cook County, there are demonstrated needs for improved transportation infrastructure, public services, affordable housing development, preservation of existing housing, transitional housing services, permanent supportive housing, workforce development, and economic development. To increase access to economic opportunity, most investments are targeted to geographic areas with a prevalence of low-income households, lower home and land values, and less historic investment. These areas can benefit from investments in housing preservation, new affordable housing construction, economic and workforce development, infrastructure improvements, and public services.

Broadly speaking, the need for these investments and services far outstrips available resources in Suburban Cook County. A key component of the draft 2025-2029 Con Plan and Uplift Cook initiative is continuing to build and sustain relationships with other nonprofit, for-profit, and public entities to increase the resources available to advance the plan’s strategies. Coordination between entities will help ensure that the allocation of resources programmed through this Annual Action Plan is impactful and can be leveraged to attract additional funds.

Under this 2025 Annual Action Plan, CDBG funds will be deployed to support planning, administration, infrastructure improvements, public facilities, and social services activities, with a particular focus on transit access. ESG resources will support homelessness prevention and intervention through improving administrative capacity outreach, shelter, and supportive services. HOME funds will be utilized to develop and rehabilitate affordable housing. All three funding sources (CDBG, HOME, ESG) will be allocated in a targeted and coordinated manner.

Funding priorities also align with the broader Uplift Cook Planning initiative. After the release of Uplift Cook, DPD will continue collaboration with stakeholder groups of philanthropic funders, financial institutions, workforce development providers, and major employers to delve deeper into related needs, resource gaps, funding and leverage options, regional initiatives, and coordination opportunities. DPD will identify specific points of connection in respective work with the overarching goals of increasing efficiency, building scale, and maximizing impact.

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

Introduction:

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

Cook County actively markets the HOME program for affordable housing solutions throughout the year. Allocation of Low-Income Housing Tax Credits (LIHTC) highly influence the development of affordable housing within the region, as LIHTC is a substantial source of affordable housing capital. Therefore, annual

LIHTC allocations determine a large share of the development pool. Increased funding from the state for permanent supportive housing (PSH) generates additional pipeline projects that highly leverage HOME funds and create units and services that are greatly needed. Additional activities yield standalone market transactions that provide diverse affordable options throughout the county.

The estimated percentage of CDBG funds to be used for activities benefiting persons of low and moderate income (75%) noted elsewhere on this page is based on a one-year period in this Annual Action Plan.

Community Development Block Grant Program (CDBG)

Reference 24 CFR 91.220(I)(1)

Projects planned with all CDBG funds expected to be available during the year are identified in the Projects Table. The following identifies program income that is available for use that is included in projects to be carried out.

1. The total amount of program income that will have been received before the start of the next program year and that has not yet been reprogrammed	0
2. The amount of proceeds from section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives identified in the grantee's strategic plan	0
3. The amount of surplus funds from urban renewal settlements	0
4. The amount of any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan.	0
5. The amount of income from float-funded activities	0
Total Program Income	0

Other CDBG Requirements

1. The amount of urgent need activities	0
2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan.	75%

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

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

HOME funds for development purposes are provided exclusively as low-interest, no-interest, or deferred loans to not-for-profit or for-profit private developers and forgivable loans to homebuyers for down payment assistance.

- 2. A description of the guidelines that will be used for resale or recapture of HOME funds when used for homebuyer activities as required in 92.254, is as follows:**

Homebuyer Assistance Recapture Provisions (Down Payment Assistance). In the event that the HOME-assisted homebuyer sells, refinances or transfers the home prior to the expiration of the applicable Affordability Period, then the homebuyer shall be required to pay all or a portion of the HOME-financed down payment assistance as a Homebuyer Recapture Amount, in order to return to the County a portion of the County's investment of HOME funds in the home. Upon any such direct or indirect sale or transfer of the home, or the homebuyer's interest therein, the homebuyer shall, at the time of such sale or transfer, repay the County the Homebuyer Recapture Amount from any available Net Transfer Proceeds. The Homebuyer Recapture Amount shall initially equal the amount of the HOME direct subsidy but shall be reduced on a pro rata basis on each anniversary of the date on which the home was purchased, based on the number of years remaining in the Affordability Period. After the expiration of the Affordability Period, the Homebuyer Recapture Amount shall equal zero dollars (\$0.00). For example, if the direct subsidy amount was \$5,000, the home was originally purchased on June 30, 2015, the Affordability Period was five years, and the resale date was July 31, 2019, the Homebuyer Recapture Amount as of the resale date would be \$1,000 (i.e., four Anniversary Dates would have occurred prior to such resale date, with a \$1,000 reduction occurring on each such Anniversary Date, for a total reduction of \$4,000 in the Homebuyer Recapture Amount, leaving \$1,000 due and payable to Cook County). Recapture Amount Limited to Net Sale Proceeds Net Sale Proceeds shall mean the gross sales proceeds arising from a direct or indirect sale or transfer of the HOME-assisted property, minus (a) the amount of any permitted senior mortgage indebtedness or any permitted refinancing thereof repaid at the time of such sale or transfer, (b) any commercially reasonable, third party brokerage fee paid by the home buyer with respect to such sale or transfer, (c) any transfer taxes which, pursuant to applicable law, are paid by the homebuyer, (d) customary title, escrow and recording charges paid by the home buyer, and (e) customary pro rations or credits made pursuant to the contract for such sale or transfer.

- 3. A description of the guidelines for resale or recapture that ensures the affordability of units acquired with HOME funds? See 24 CFR 92.254(a)(4) are as follows:**

Cook County implements recapture provisions for all homebuyer assistance activities funded through

HOME. These provisions are based on the County's HOME Policies and Procedures Manual, originally adopted in 2013 and updated in 2019 to reflect the most recent federal HOME regulations. The same requirements are incorporated into funding recipient agreements to ensure continued compliance and enforceability. The full policies and procedures manual was previously shared with HUD. Related documents can be furnished upon HUD request.

4. Plans for using HOME funds to refinance existing debt secured by multifamily housing that is rehabilitated with HOME funds along with a description of the refinancing guidelines required that will be used under 24 CFR 92.206(b), are as follows:

Cook County will use HOME funds in April 2025 to refinance existing debt secured by Bethlehem Village Apartments, a seventy-two (72) unit multifamily development located in Harvey Illinois.

The refinancing guidelines required by the County pursuant to 24 CFR 92.206(b) are as follows:

- (a) the refinancing is necessary to continue long-term affordability;
- (b) the minimum affordability period shall be fifteen (15) years from the refinancing closing date; and
- (c) a review of management practices must demonstrate
 - (i) that disinvestment in the property has not occurred;
 - (ii) that the long-term needs of the project can be met; and
 - (iii) that the feasibility of serving the targeted population over an extended affordability period can be demonstrated.

5. If applicable to a planned HOME TBRA activity, a description of the preference for persons with special needs or disabilities. (See 24 CFR 92.209(c)(2)(i) and CFR 91.220(l)(2)(vii)).

N/A

6. If applicable to a planned HOME TBRA activity, a description of how the preference for a specific category of individuals with disabilities (e.g. persons with HIV/AIDS or chronic mental illness) will narrow the gap in benefits and the preference is needed to narrow the gap in benefits and services received by such persons. (See 24 CFR 92.209(c)(2)(ii) and 91.220(l)(2)(vii)).

N/A

7. If applicable, a description of any preference or limitation for rental housing projects. (See 24 CFR 92.253(d)(3) and CFR 91.220(l)(2)(vii)). Note: Preferences cannot be administered in a manner that limits the opportunities of persons on any basis prohibited by the laws listed under 24 CFR 5.105(a).

N/A

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

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

A summary of written standards will be included in the Appendix to the draft 2025-2029 Con Plan.

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

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

3. Identify the process for making sub-awards and describe how the ESG allocation available to private nonprofit organizations (including community and faith-based organizations).

ESG funds are allocated based on an annual competitive funding cycle. Related funding applications and guidance are published online in the early part of the year. Funding application availability is publicized via e-blast to current and prospective applicants as well as through presentations to CoC leaders and members. A pre-application workshop is also conducted to clarify related requirements and processes. Applicant eligibility is restricted to 501(c)3 not-for-profit organizations serving homeless persons (and/or persons at risk of becoming homeless) in suburban Cook County. Matching fund requirements, minimum and maximum funding application requests thresholds, and other restrictions also apply.

DPD also coordinates with the Alliance to discuss anticipated funding allocation proportions by program component. These are subject to change based on available data, perceived needs, and other relevant feedback. Once applications are received, they are reviewed for eligibility/capacity and related site visits are conducted. Individual and small groups of DPD staff review and rate each application based upon specified criteria resulting in an average score. Preliminary funding recommendations are then developed and subject to further review/approval by DPD senior management, EDAC, and the Cook County Board.

- 4. If the jurisdiction is unable to meet the homeless participation requirement in 24 CFR 576.405(a), the jurisdiction must specify its plan for reaching out to and consulting with homeless or formerly homeless individuals in considering policies and funding decisions regarding facilities and services funded under ESG.**

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

- 5. Describe performance standards for evaluating ESG.**

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

Discussion:

A broader discussion of the coordinated entry system and the efforts to address homelessness can be found in the draft 2025-2029 Con Plan.

Appendix

Data Sources

Major County and Regional Plans

- Cook County 2024-2027 Policy Roadmap
- Cook County Housing Policy Brief (2024)
- Cook County Transit Plan (2023)
- Cook County Digital Equity Plan (2023)
- Workforce Innovation and Opportunity Act Local Workforce Innovation Area (LWIA) 7 Local Plan (2024-2028)
- Report on Childcare in Cook County (2023)
- ON TO 2050
- The Alliance to End Homelessness in Suburban Cook County 2019-2022 Strategic Plan

Data Sources

- 2013-2017 ACS 5-Year estimates
- 2018-2022 ACS 5-Year estimates
- 2017-2021 ACS 5-Year Estimates PUMS
- 2016-2020 CHAS
- 2022 Esri Business Analyst
- 2024 Esri Business Analyst
- Chicago Metropolitan Agency for Planning
- Cook County Clerk Tax Rate Report 2023
- Cook County Greenprint
- CoStar
- DePaul University Institute for Housing Studies
- Greater Chicagoland Economic Partnership
- Housing authority data
- Lightcast
- MLS
- PIH Information Center (PIC)
- U.S. Bureau of Labor Statistics
- U.S. Census
- U.S. Census Building Permits
- U.S. Centers for Disease Control and Prevention

Cook County Emergency Solutions Grants (ESG) Policy and Procedure Manual

COOK COUNTY
EMERGENCY
SOLUTIONS GRANTS
(ESG) POLICY AND
PROCEDURE
MANUAL DRAFT AS
OF MARCH 1, 2025

Adopted on:
December 15, 2024
Cook County Bureau of Economic Development
Department of Planning and Development



COOK COUNTY
DEPARTMENT OF
Planning and
Development

Cook County ESG Policy and Procedure Manual

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DRAFT

Introduction

Mission Statement

The Bureau of Economic Development seeks to foster community and economic development through strategic leveraging of resources to stimulate: (1) sustainable community investment connecting housing, employment, development, and transportation; (2) business growth, attraction, and retention; (3) affordable housing; and (4) regional planning focused on the integration of economic, physical, and social infrastructure.

Program Description

The Emergency Solutions Grant (ESG) is a funding source administered by the U.S. Department of Housing and Urban Development (HUD) authorized under the “Homeless Emergency Assistance and Rapid Transition to Housing” (HEARTH) Act of 2009. The HEARTH Act amends and reauthorizes the McKinney-Vento Homeless Assistance Act of 1987. The primary changes include a greater emphasis on homelessness prevention, the addition of rapid re-housing, the regulatory requirements for Homeless Management Information System (HMIS) use, increased emphasis on performance, and a requirement for greater coordination and collaboration between the recipient and the Continuum of Care.

While the prior ESG program under the McKinney-Vento Act had a greater emphasis on homeless shelters, the HEARTH regulations limit the funding for shelter operations and focus on assisting beneficiaries’ access and maintain housing through homeless prevention and rapid re- housing. Additionally, HMIS is now an eligible component for ESG funding.

The regulations implementing the ESG Program are found at 24 CFR Part 576.

Eligible Areas

Cook County currently receives ESG funds as an annual entitlement allocation on the basis of its qualification as an urban county. Cook County ESG funds may only be utilized within the limits of the current effective Cook County Urban County area, excluding other entitlement communities also receiving ESG funding. All jurisdictions in Cook County may be served by Cook County’s ESG program in this funding year except for: Chicago, Cicero, Evanston, and Oak Park.

Proposed funding applications must serve suburban Cook County—either in its entirety or within a specified location. Additionally, clients funded through Homelessness Prevention or Rapid Re-housing to move into or stay in apartments in these locations cannot be funded.

Eligible Activities

There are five eligible activities for the ESG program:

- (1) Homelessness Prevention
- (2) Rapid Re-housing
- (3) Homeless Management Information Systems (HMIS)
- (4) Street Outreach, and

(5) Emergency Shelter

Means of Carrying Out Activities

ESG grant funds are awarded to subrecipients to carry out homeless assistance, homelessness prevention, rapid re-housing, and homelessness data projects. County planners are assigned to coordinate these projects with non-profit agencies serving the homeless or those at risk of becoming homeless throughout suburban Cook County.

Cook County releases applications annually to non-profit organizations (“subrecipients”) to carry out activities that are eligible under the Emergency Solutions Grant regulations and then funds projects according to the merit and rated criteria of each application. It is expected that subrecipients will complete their award within twelve months.

Homelessness Prevention

ESG funds may be used to pay for the following items associated with homeless prevention. The costs of homelessness prevention are only eligible to the extent that the assistance is necessary to help the program participant regain stability in the program participant's current permanent housing or move into other permanent housing and achieve stability in that housing.

- Relocation and stabilization services; and
- Short- and/or medium-term rental assistance (up to 24 months of assistance in any 3 year period.

Homeless Prevention: Assistance and services to prevent households from becoming homeless. To qualify as being at risk, households must be under 50% area median income and must also meet the criteria in the “at risk of homelessness” definition in 24 CFR §576.200. Any assistance a household receives must either be necessary to help the household regain stability in their current household or move elsewhere and achieve permanent stability there. Subrecipients must re-evaluate and re-certify program participants for Homeless Prevention eligibility no less than once every three months.

o **Financial Assistance—**

o **Rental Application Fees**

o **Security Deposits—**equal to no more than 2 months’ rent

o **Last Month’s Rent—**(if necessary) can be paid at time of security deposit and first month’s rent.

o **Utility Deposits** for standard utilities.

o **Utility Payments** (A partial payment for a month counts as one month’s payment.)

- Up to 6 months in arrears for gas, electric, water, and sewage.
- Up to 24 months of current payments for gas, electric, water, and sewage.

o **Moving costs—**eligible costs include truck rental, moving company costs, temporary storage fees for up to three months from when client starts receiving assistance (not arrears) and until client moves into permanent housing.

➤ **Homeless Prevention Services—**Staff salaries for assisting individuals and households with housing relocation and stabilization.

- **Housing Search and Placement**—includes housing search and placement; assessment of housing barriers, needs, and preferences; locating housing for clients; outreach and negotiation with owners; assistance with rental applications; assessment of housing for ESG requirements for habitability, lead-based paint, and rent reasonableness; assistance with moving and utility connection arrangements; and tenant counseling.
- **Housing Stability case management**—evaluating individuals and households receiving homeless prevention assistance; conducting initial intake and assessment; counseling; assisting individuals and households in securing mainstream services and financial benefits; developing an individualized housing plan; and conducting re-evaluations.
- **Mediation**—between program participant and property owner or person with whom client is living to keep participant from losing permanent their housing.
- **Legal Services**—legal services necessary to keep participant from losing permanent housing or to assist with issues that prohibit a program participant from obtaining permanent housing.
- **Credit Repair**—credit counseling or other services to assist program participants in household budgeting. **Does not include payment or modification of a debt.**

➤ **Rental Assistance**—except for rental arrears, this cannot be provided to individuals or households who are receiving other public rental subsidies. Assistance can be project based or tenant based. Rent cannot exceed Fair Market Rent. The subrecipient must have an agreement with the property owner and only make payments directly to the property owner. The program participant must have a legally binding lease with the property owner, other than in the case of rental assistance for rental arrears only. Other than for Rental Arrears, late fees are not an eligible cost.

- **Rental Arrears**—a one-time payment of up 6 months in rental arrears, including late fees for arrears. The rent owed to the owner must be sufficiently documented in the owner’s records.
- **Tenant-based rental assistance:** The tenant chooses their own housing unit in which to live. The subrecipient can terminate assistance if tenant move out of the unit they lease, or if the tenant becomes ineligible for assistance.
 - **Short Term**—Up to three months of rental assistance.
- **Medium Term**—Four to 12 months of rental assistance.

Rapid Re-Housing (RRH)

Rapid Re-housing: Rapid Rehousing assistance can be used to help a homeless household move into permanent housing and achieve stability in that housing. Individuals and households must meet the homeless definition, as described in 24 CFR § 576.500, or must meet the criteria under paragraphs 1 or 4, generally be staying in a homeless shelter or other place not meant for human habitation. Procedures must establish the order of priority for obtaining evidence as third-party documentation first, intake worker observations second, and certification from the person seeking assistance third. However, lack of third-party

documentation must not prevent an individual or family from being immediately admitted to emergency shelter, receiving street outreach services, or being immediately admitted to shelter or receiving services provided by a victim service provider (24 CFR 576.500 (b)).

- The same eligible activities that apply to Homelessness Prevention apply to Rapid Re-housing, so long as the program participant meets the definition of being **homeless**. Services are then Rapid Re-housing Services, instead of Homelessness Prevention Services. A household cannot be served with Rapid Re-housing and Homelessness Prevention funding simultaneously. A household must meet one definition or the other (homeless or at risk of homelessness).

Client Eligibility and Coordinated (CE)

Entry All Cook County ESG funded agencies are required to participate in the Coordinated Entry process and screen each potential ESG client as follows, per the Entry Point: Policies and Procedures manual:

Pre-Screen Tool and Safety Assessment

The pre-screen tool will be administered by intake specialists at the Call Center and Walk-In Centers for Individuals who are at-risk of homelessness, newly experiencing homelessness, or uncertain about how to connect with resources. Intake specialists will use a brief safety assessment and pre-screen tool to help determine next steps. ***If the individual is at-risk for domestic or intimate partner violence, an immediate referral will be made to domestic violence-specific resources.*** If the individual's safety is not at issue, the Entry Point intake/call-specialist will proceed with the pre-screen tool. The pre-screen tool is designed as a decision tree that helps identify if the person is at-risk of homelessness or literally homeless and the person's immediate needs: homelessness prevention resources, short-term stabilization or diversion services, emergency shelter or referral to specialized services (e.g., Veterans, transitions aged youth (18-24) or domestic violence). The Entry Point intake/call-specialist conducts a brief 5-10-minute conversation with the participant to complete the tool and to determine what the appropriate next step should be.

At-Risk of Homelessness – Homelessness Prevention, Diversion and Stability Services -Homeless Prevention

It is expected that all IDHS, **ESG**, EFSP and Reade homeless prevention funds will be distributed to households referred through coordinated entry processes. Referrals for homeless prevention assistance will be made after the intake/call-specialist completes a short eligibility questionnaire with the individual. If an individual appears to meet the eligibility requirements for homeless prevention, he or she will be referred to a homeless prevention case manager. Suburban Cook County CoC is piloting a vulnerability screening to enable targeted homeless prevention services to households most likely to become literally homeless without assistance. CoC written Homeless Prevention standards pending.

Literally Homeless – Homeless System Services

If an individual is literally homeless, intake/call specialists offer a diversion appointment if safe, alternative options may be available to avoid staying in

shelter. If safe, alternative options do not exist, intake/call specialists provide information about accessing emergency shelters. Referral from the call/intake specialist is not required for access to emergency shelter. An individual may also be offered a STSS referral. The stabilization case manager may administer a VI-SPDAT assessment to initiate the housing assessment process (see Entry Point Phased Assessment) and connect the individual to the appropriate street outreach or shelter day center case managers to complete the housing assessment and provide housing navigation services. Ongoing housing assessment and navigation services may also be provided by the STSS case manager.

Entry Point Phased Assessment

The Entry Point Phased Assessment will be administered to literally homeless households who have asked for assistance obtaining stable housing. The Entry Point Phased Assessment can be initiated at any Access Location other than the Call Center. All Entry Point assessors must complete Entry Point Basic Training and will understand how to administer trauma informed, culturally competent, client centered assessments. The assessment will be completed in stages according to the information required at each step of the process.

The Cook County Continuum has adopted a Universal Intake form that all ESG Subrecipient agencies must use during the intake process after the initial Entry Point Assessment is performed.

Homeless Management Information Systems (HMIS)

HMIS: Cook County has required ESG (CV) subrecipients to use the Homeless Management Information Systems (HMIS) and for Domestic Violence services agencies to use a comparable data tracking program to record information on persons that utilize ESG, and it is required by HUD.

- **Costs of maintaining, upgrading, and warehousing data.**
 - Purchasing or leasing computer hardware;
 - Purchasing software or software licenses;
 - Purchasing or leasing equipment, including telephones, fax machines, and furniture;
 - Obtaining technical support;
 - Leasing office space;
 - Paying utility charges necessary to operate or contribute data to the HMIS;
 - Paying salaries for operating HMIS, including data entry, monitoring and reviewing data quality, and data analysis;
 - Paying participation fees charged by the HMIS Lead; and Paying staff travel costs to conduct intake or HMIS training.
 - **Conducting HMIS training, including travel costs.**
 - **Salaries for those operating HMIS:** Data entry, analysis, reporting, and training other staff to use HMIS.
 - **Travel and attendance costs for HMIS training.**

- **Costs for Victims' Services Providers/Domestic Violence Agencies**
 - **Costs of Comparable Tracking Database (for victims' services providers only):** Costs of establishing and operating database to track longitudinal data; data cannot be entered into HMIS.

Street Outreach

ESG funds may be used to provide essential services necessary to reach out to unsheltered homeless people, defined as individuals and families who qualify as homeless under paragraph (1)(i) of the “homeless” definition under § 576.200.

- connect them with emergency shelter, housing, or critical services; and
- provide urgent, non-facility-based care to people who are unwilling or unable to access emergency shelter, housing, or an appropriate health facility.

Essential services consist of

- **Engagement:** Eligible costs include **staff salaries** and **cell phone expenses** for workers who locate, identify, and build relationships with unsheltered persons to provide immediate support and connect them to emergency, community, and mainstream services.
- **Case Management: Staff salaries** for assessing needs and delivering services for participants.
 - o Using centralized or coordinated intake and assessment system.
 - o Determining eligibility, delivering services, securing mainstream services, referring clients to other providers,
 - o Monitoring and evaluating client progress
 - o Developing individualized plans for permanent housing stability for clients.
- **Transportation**
 - o Transportation costs (**mileage, gas, or public transportation costs**) by outreach workers, and other related workers, and transportation costs for Homeless Assistance providers to transport unsheltered persons to shelters or other emergency facilities.
 - o Cost of program participant to take public transportation.
- **Services to Special Needs Populations:** Eligible costs include all of the above specifically for homeless youth, victim services (Domestic Violence shelters), and services for people with HIV/AIDS.

Emergency Shelter

ESG funds may be used for costs of

- providing essential services to homeless families and individuals in emergency shelters;
- renovating buildings to be used as emergency shelter; and
- operating emergency

shelters. Eligible essential services

include:

- Case management;
- Child care;
- Education services;
- Employment assistance and job training;
- Outpatient health services;
- Legal services;
- Life skills training;
- Mental health services;
- Substance abuse treatment services;
- Transportation; and
- Services for special

populations. Shelter Operations

includes:

- Maintenance costs, including minor or routine repairs.
- Rent
- Security
- Fuel
- Equipment
- Insurance
- Utilities
- Food
- Furnishings
- Supplies
- Hotel or motel vouchers
-

Shelter renovations includes labor, materials, tools, and other costs for renovation or conversion into an emergency shelter. The emergency shelter must be owned by a government entity or private nonprofit organization. Currently, Cook County does not offer the use of shelter renovations under the Emergency Shelter component.

Grant Cycle

The County received ESG funding from HUD to respond to, prepare for and prevent the Coronavirus. The County's program year begins on October 1st and ends of September 30th. The life of the ESG program was from March 2020 – September 30, 2023.

Pre-Program Year Planning

Before the program year begins, the County notifies potential subrecipients of the availability of ESG funding and accepts applications to administer its programs. Once applications are selected and approved, the information is included in the Annual Action Plan, which is the County's official application to HUD for the use of ESG and other community development grant funds administered by HUD's Office of Community Development (i.e. CDBG and HOME).

For more detailed information on this phase of the grant cycle, please review the [Planning](#).

section of this manual.

Program Year

The County will conduct environmental reviews, execute subrecipient agreements, and provide a **AUTHORIZATION TO INCUR GRANT COSTS** to subrecipients. Subrecipient agreements must be awarded within 180 days of the ESG grant obligation. Once a subrecipient receives this authorization, they may begin to utilize ESG funds.

During the program year, subrecipients will provide quarterly reports and pay requests to the County. The County will process all pay requests within 30 days of the receipt of a complete pay package. The County will also monitor each subrecipient for program compliance through a combination of desk review and onsite monitoring.

Subrecipient agreements typically have a twelve month term. Funds are expected to be fully expended by the end of the program year (September 30th). At its discretion, the County may amend the term of the agreement to extend the period of performance beyond the standard twelve month term. All funds must be expended within 24 months of the ESG grant obligation.

Closeout and Recordkeeping

Within 90 days of the completion of the subrecipient agreement, the County will conduct an **award closeout**. An award closeout is the process where the County determines that the scope of work has been completed, all applicable administrative actions have been taken, and all financial, performance, and other required reports have been provided to the County. Most records must be kept for a minimum of five years after closeout.

General Administration

Roles and Responsibilities

County Deputy Director of Community Development

- Serves as primary point of contact for the local HUD field office for the ESG program
- Provides managerial support to ESG Program Manager
- Ensures all staff assigned to ESG have access to proper training and materials
- Reviews overall ESG program compliance and expenditure deadlines
- Coordinates inclusion of ESG into overall Consolidated Plan, Annual Action Plan, and annual reporting requirements
- Coordinates all necessary reporting, approvals, and correspondence between ESG staff, the Bureau Director, and other County officials.

Senior Program Manager

- Responsible for the day to day oversight of ESG grant administration
- Prepares budgets for ESG
- Prepares monitoring schedule for ESG
- Reviews all performance and compliance reporting necessary for ESG administration, including IDIS and HMIS
- Maintains all policies, procedures, forms, and reports for proper ESG administration
- Serves as primary point of contact for Continuum of Care
- Provides managerial support to ESG Planners assigned to subrecipients

Administrative Assistant III

- Receipt and tracking of pay requests
- Recordkeeping
- IDIS Online Program Year Set Up

Compliance Specialist

- Preparation of environmental review records (ERRs)

Management Policies

Deputy Director of Community Development will ensure that all staff involved with ESG projects have access to all information necessary to successfully administer oversight activities and that information is accurately communicated between staff. The following guidelines describe the actions to be taken by management to ensure effective communication.

Staff Training

See Staff Training Curriculum

The [Deputy Director of Community Development] will ensure staff responsible for ESG

Program monitoring are knowledgeable of all related federal requirements. On an annual basis, the [Deputy Director of Community Development] will assess the training needs of existing staff.

Throughout the program year, the [Deputy Director of Community Development] will notify staff of available training and include funds to pay for training as part of the annual operating budget.

The [Deputy Director of Community Development] will maintain frequent contact with the local HUD Field Office and ensure staff are able to attend HUD-sponsored workshops and meetings. The [Deputy Director of Community Development] will ensure all ESG staff have a HUD Exchange account to be notified of training opportunities.

All new staff will undergo an onboarding process with existing staff and be evaluated for training needs. Onboarding will include ESG program requirements and other applicable federal regulations, review of current policies and procedures, roles and responsibilities, use of the Department Information System, and recordkeeping.

Management and Communications

Ongoing Continuum of Care Coordination

As a recipient of ESG funds, the County is required to consult with the Continuum of Care [CoC] that serves its jurisdiction.

- The [ESG Program Manager] will attend periodic meetings of the CoC.
- The [ESG Program Manager] will consult with the CoC during the development of the Annual Action Plan to receive input on the allocation of ESG funds and the development of performance standards.
- During the development of the annual report, the Consolidated Annual Performance and Evaluation Report (CAPER), the [ESG Program Manager] will consult with the CoC to evaluate the outcomes of ESG-funded projects and activities.
- As needed, the [ESG Program Manager] will consult with the CoC in regard to proposed changes in policies and procedures related to the administration and operation of the HMIS.

Periodic Meetings (Weekly, Biweekly, Monthly)

The [Deputy Director of Community Development] will meet on an as-needed basis with the [ESG Program Manager] and other ESG staff to review the status of the ESG program and identify opportunities and risks.

Management will schedule regular, periodic staff meetings for staff involved with ESG. The purpose of the meetings will be to maintain clear communication between staff and managers on current tasks, updates, and issues relative to operations and compliance objectives. At a minimum, topics will include:

- Status of currently funded projects
- Outstanding Pay Requests
- Updates from HUD (new resources, guidance, training)
- Continuum of Care communication

All staff may use these meetings to propose changes to existing workflow, policies, procedures and forms based on issues and inefficiencies. These meetings will also be used to share and review HUD announcements, policy changes, and training opportunities.

Quarterly Meetings

The [Deputy Director of Community Development] will schedule a meeting after each quarter to assess progress of ESG(CV)-funded projects, including expenditure ratios, performance outcomes versus stated goals, and annual monitoring tasks compared to monitoring schedule. The purpose of the meeting will be to identify issues with County, staffing, budgets, and training and adjust the schedule and resources accordingly.

The [ESG(CV)- Program Manager] will identify the necessary reallocation of funds and develop a budget amendment. If the proposed change warrants a substantial amendment based upon the current Citizen Participation Plan and HUD rules, the [ESG(CV)- Program Manager] will draft the related substantial amendment language and coordinate with the Planning and Policy Manager to proceed as appropriate. The Planning and Policy Manager will submit a draft substantial amendment packet to the Director for approval prior to publication, release, and submittal to HUD.

Annual Meeting

All ESG staff will meet as a team after the preparation of the annual report (CAPER) to review the administration of the program to identify highlights and weaknesses.

The [Deputy Director of Community Development] and the [ESG(CV)- Program Manager] will review all ESG(CV)- policies and procedures versus current HUD guidance on an annual basis at the end of the program year. Manuals and other material should be consistent with action plan and department objectives and reflect the most recent policy and federal requirements. Any updates to legal agreements will be reviewed by legal support. Legal will conduct a review of written agreement templates.

Information Systems and Recordkeeping

All ESG(CV)-related records will be maintained onsite within the offices of the Bureau of Economic Development. The County will not collect all detailed-level client records. Much of the client level information will be maintained by each funded subrecipient and will be available for review and monitoring for a period of five years after grant closeout per the executed subrecipient agreement.

Monitoring records include a combination of physical paper records and electronic records. Physical paper records, especially documentation that contains personal information shall be filed and/or stored in a location accessible to authorized staff in a secured, locked filing system. All electronic records will be stored on local directories of staff computers, or the network drive shared by the Department. Access to electronic records is governed by the County's internal information technology policies that limit access to resources on an as-needed basis.

Monitoring records will be maintained for a minimum period of five years after the completion of the calendar year in which the monitoring was conducted. For any project subject to any litigation, claim, or audit, the records must be retained until all litigation, claims, or audit findings involving the records have been resolved and final action taken.

SHARED NETWORK DIRECTORY

Only working drafts of documents shall be stored on staff computers. All final versions of correspondence, checklists, and other documents related to ESG projects will be placed within the project's file on the shared network directory.

Project files will be maintained by funded project and program year. The project file for the program year will include application, executed agreements and amendments, as applicable, pay requests and supporting documentation, all correspondence, monitoring checklists, correspondence, and other documents related to specific projects will be maintained in the project file for the project.

Document Control

The current approved version of all forms, checklists, templates and other documents will be available on a shared network directory accessible to ESG(CV)- staff. Staff will use only the current approved version of documentation to conduct monitoring tasks. The [ESG Program Manager] is responsible for maintaining and updating all official ESG(CV)- agreements, forms, reports, and other templates.

General Policies

The following section outlines general policies followed by County staff in the administration of its ESG allocation. Where applicable, the County will ensure its funded subrecipients have substantially equivalent policies that satisfy all relevant federal requirements. The County's policies for ensuring subrecipient compliance are outlined in the section on Subrecipient Oversight.

Fair Housing and Equal Opportunity

Affirmative Outreach

The County will ensure its funded subrecipients conduct affirmative outreach efforts to comply with 24 CFR 576.407(b), including the provision that each subrecipient makes it known that use of the facilities, assistance, and services are available to all on a nondiscriminatory basis.

Subrecipients will be required to post this information in conspicuous places visible to applicants of the program.

Reasonable Accommodation for Persons with Disabilities and Limited English Proficiency (LEP)

Subrecipients will be required to adopt and follow a written policy that provides reasonable accommodations for effective communication with persons with disabilities and persons with Limited English Proficiency (LEP). The County may impose additional requirements through Special Conditions in the subrecipient agreement if it is determined that existing procedures are insufficient.

Related County-wide Policies:

https://www.cookcountyil.gov/sites/g/files/ywwepo161/files/service/reasonable_accommodation_policy_7.01.2021.pdf

<https://www.cookcountyil.gov/sites/g/files/ywwepo161/files/service/cook-county-offices-under-president-language-access-policy-may-2021-vf.pdf>

<https://www.cookcountyil.gov/ethicsordinance>

Subrecipients will be required to follow their own adopted policy that complies with 24 CFR 576.404 and those of the Uniform Administrative Requirements at 2 CFR 200.317 and 200.318, including provisions for both organizational and individual conflicts of interest. Subrecipients may submit written requests for specific case-by-case exceptions to the conflict of interest provisions. The County will review all requests for exceptions after consultation with its legal team and the local HUD field office.

Conflict of Interest

As a recipient of ESG funding, the County is required to comply with the program-specific conflict of interest provisions at 24 CFR 576.404 and those of the Uniform Administrative Requirements at 2 CFR 200.317 and 200.318. The County's Ethics Ordinance, which covers all County staff and elected and appointed officials, meets the minimum requirements set forth in the regulations above.

Violence Against Women Act (VAWA)

The Violence Against Women Act (VAWA) is a federal law that, in part, provides housing protections for people applying for or living in units subsidized by the federal government and who have experienced domestic violence, dating violence, sexual assault, or stalking, to help keep them safe and reduce their likelihood of experiencing homelessness. Under VAWA, someone who has experienced domestic violence, dating violence, sexual assault, and/or stalking (VAWA violence/abuse):

- Cannot be denied admission to or assistance under a HUD-subsidized or assisted unit or program because of the VAWA violence/abuse committed against them.
- Cannot be evicted from a HUD-subsidized unit nor have their assistance terminated because of the VAWA violence/abuse committed against them.
- Cannot be denied admission, evicted, or have their assistance terminated for reasons related to the VAWA violence/abuse, such as having an eviction record, criminal history, or bad credit history.
- Must have the option to stay in their HUD-subsidized housing, even if there has been criminal activity directly related to the VAWA violence/abuse.
- Can request an emergency transfer from the housing provider for safety reasons related to the VAWA violence/abuse committed against them.
- Must be allowed to move with continued assistance, if the survivor has a Section 8 Housing Choice Voucher.
- Must be able to provide proof to the housing provider by self-certifying using the HUD VAWA Self-certification ([Form HUD-5382](#)), and not be required to provide more proof unless the housing provider has conflicting information about the violence/abuse.
- Must receive HUD's Notice of VAWA Housing Rights ([Form HUD-5380](#)) and HUD's VAWA Self-certification Form ([Form HUD-5382](#)) from the housing provider, when they are denied admission to a HUD-subsidized unit or HUD program, when they are admitted to a HUD-subsidized unit or HUD program, and when they receive a notice of eviction from a HUD-subsidized unit or notice of termination from a HUD program.
- Has a right to strict confidentiality of information regarding their status as a survivor.
- Can request a lease bifurcation from the owner or landlord to remove the perpetrator from the lease or unit, and if the housing provider bifurcates, it must be done consistent with applicable federal, state, or local laws and the requirements of the HUD housing program.
- Cannot be coerced, intimidated, threatened, or retaliated against by HUD-subsidized housing providers for seeking or exercising VAWA protections.
- Has the right to seek law enforcement or emergency assistance for themselves or others without being penalized by local laws or policies for these requests or

because they were victims of criminal activity.

Emergency Transfer Plan

In accordance with the Violence Against Women Act (VAWA), the Cook County ESG program allows participants who are victims of domestic violence, dating violence, sexual assault, or stalking to request an emergency transfer from the participant's current unit to another unit. Each subrecipient that administers ESG rental assistance in Cook County must have an emergency transfer plan under 24 CFR 5.2005(e). Please see an emergency transfer plan from HUD here: <https://www.hud.gov/sites/documents/5381.docx>

Inclusion / Non-discrimination Policy

Discrimination: The Cook County ESG program and its participant agencies do not discriminate in the course of assessment, matching, and referral for housing and other services on the sole basis of anyone's:

- Gender, gender status, or gender expression
- Being LGBTQ+
- Race, color, tribe, or ethnicity
- Immigration, refugee, or citizenship status
- Income level, or source of income
- Ability to read, write, or speak English
- Job status or education level
- Alcohol or drug use or addiction, or other addictions
- Health or mental health status, or having HIV or AIDS
- Age
- Marital, family, or partnership status
- Legal history
- Veteran or military discharge status
- Body size
- Participation in the street economy
- Religion or personal philosophy
- Not following a doctor's or therapist's medical treatment suggestions
- Physical, developmental, intellectual, or emotional ability

Cook County does not tolerate any speech, language, or behavior that is abusive or demoralizing to anyone who might participate in ESG services. We expect participant agencies and their staff, interns, and volunteers to be vigilant in enforcing this standard.

Some programs may be required to prioritize enrollment based on regulations imposed by their funding sources and/or state or federal law. For example, a HOPWA-funded project might be required to serve only participants who have HIV/AIDS. Some programs are dedicated to veterans, youth, or survivors of domestic violence, etc. All such programs will avoid discrimination to the maximum extent allowed by their funding sources and their authorizing legislation.

Participant agencies must comply with all Federal, State, and local Fair Housing laws and regulations. Participants will not be "steered" toward any particular housing facility or neighborhood based on their race, color, national origin, religion, sex or gender identity, sexual orientation, disability, or the presence of children.

Confidentiality: Personal Identifiable Information (PII)

According to the United States Department of Labor Personal Identifiable Information (PII) is defined as: any representation of information that permits the identity of an individual to whom the information applies to be reasonably inferred by either direct or indirect means. Further, PII is defined as information: (i) that directly identifies an individual (e.g., name, address, social security number or other identifying number or code, telephone number, email address, etc.) or (ii) by which an agency intends to identify specific individuals in conjunction with other data elements, i.e., indirect identification. (These data elements may include a combination of gender, race, birth date, geographic indicator, and other descriptors). Additionally, information permitting the physical or online contacting of a specific individual is the same as personally identifiable information. This information can be maintained in either paper, electronic or other media.

Listed in the governing regulations for Emergency Solutions Grants (24 CFR 576.200) the topic of Confidentiality is addressed in the following section: Confidentiality (24 CFR 576.500 (x))

(1) The recipient and its subrecipients must develop and implement written procedures to ensure:

(i) All records containing **personally identifying information** (as defined in HUD's standards for participation, data collection, and reporting in a local HMIS) of any individual or family who applies for and/or receives ESG assistance will be kept secure and confidential;

(ii) The address or location of any domestic violence, dating violence, sexual assault, or stalking shelter project assisted under the ESG will not be made public, except with written authorization of the person responsible for the operation of the shelter; and

(iii) The address or location of any housing of a program participant will not be made public, except as provided under a preexisting privacy policy of the recipient or subrecipient and consistent with state and local laws regarding privacy and obligations of confidentiality.

(2) The confidentiality procedures of the recipient and its subrecipients must be in writing and must be maintained in accordance with this section.

Cook County is dedicated to ensuring that all participant/client information is protected and stored in a secure place. Before the global pandemic paper files were stored under “lock and key” in a secured file room. Due to the pandemic Cook County Department of Planning and Development (DPD) had to switch to digital files and now must redact Personal Identifiable Information (PII) from invoices and client files. Going forward DPD will ensure that confidentiality is maintained by redacting all PII.

Drugfree Workplace

As a recipient of ESG funding, the County and its ESG-funded projects and programs are subject to the Federal Drug Free Workplace Act (41 U.S.C. Section 701, et seq) and HUD's implementing regulations at 2 CFR 182. To comply with these requirements, the County has adopted a Drug and Alcohol Policy. Subrecipients will be required to follow their own adopted policy.

Related County-wide policies:

<https://www.cookcountyil.gov/sites/g/files/ywwepo161/files/service/drug-and-alcohol-policy.pdf>

Faith-Based Activities

As a recipient of ESG funding, the County will comply with Executive Order 13279 “Equal Protection of the Laws for Faith-Based and Community Organizations” and its corresponding regulations at 24 CFR § 5.109. In the administration of ESG funds, the County will not discriminate against an organization on the basis of the organization's religious character, affiliation, or lack thereof, or on the basis of the organization's religious exercise. In this context, discrimination includes disapproval, disqualification, and disparate treatment. The County will ensure its subrecipients comply with the Executive Order and corresponding regulations through its subrecipient oversight and monitoring.

Planning

Budgeting

ESG funding became available to Cook County through contract in June of 2020. The purpose of the budgeting process is to determine the total amount of resources available, including funds available for reallocation.

- **Determine Internal Budget Needs.** The [ESG Program Manager] will determine the program administration and personnel costs for the program, including staffing, legal support; administrative assistance, and other administrative costs related to supplies, technical equipment, training, and professional services. The Cross-Cutting Service Unit Managers (i.e., Planning and Policy Manager, Construction Manager, Compliance Manager) will also determine similar admin/personnel costs associated with their respective service units in coordination with the CD, Housing, and ED Program Managers in other division budgets. The Finance Program Manager will account for similar administration and personnel costs in their division. This step is conducted in accordance with the grant cycle calendar.
- **Consultation with Continuum of Care.** The [ESG Program Manager] will notify the Alliance to End Homelessness in Suburban Cook County (CoC) of the availability of the funds, including funding limitations by eligibility category, and request written recommendations on the use of funding. The CoC can provide recommendations for funding and changes to existing policies, procedures, or performance standards.

Project Selection

Consultation with Continuum of Care

The Continuum of Care (CoC) is a community planning process to organize and deliver housing and services to meet the specific needs of people who are homeless as they move to action steps to end homelessness and prevent a return to homelessness. The Alliance to End Homelessness in Suburban Cook County serves as the lead agency for Cook County's Continuum of Care. The Alliance brings together a range of services and housing options for homeless people. The Alliance convenes meetings of a variety of stakeholders to cooperatively set priorities, collect data, rank project applications, and measure outcomes. In coordinating the annual application to the HUD for homeless assistance grants, the Alliance brings several million dollars in CoC funding per year to support homeless programs in the region.

The [ESG Program Manager] will consult with the CoC during the development of the Annual Action Plan to receive input on the allocation of ESG funds and the development of performance standards.

Notice of Funding Availability (NOFA)

The County notified potential subrecipients of the availability of ESG funds in the summer of 2020. All prior subrecipients in good standing and any agencies that have expressed

interest in applying for the funds will be notified. The County will also publicize the NOFA via social media and its website.

Requirements for Applying

Non-profit organizations applying for ESG funding must first comply with the following requirements:

1. The organization must be a 501(c)3 serving persons who are homeless or at risk of becoming homeless in suburban Cook County.
2. The organization should have undertaken the proposed activity before with positive results.
3. The organization should have experience with the Emergency Solutions Grants (or the former Emergency Shelter Grant) Program or other Federal programs.
4. Subrecipient staff should understand the additional requirements associated with Federal funding (for example, when staff split their time between ESG and non-ESG functions, keeping detailed records of time spent on specific activities).
5. The organizations should be familiar with the specific regulatory requirements associated with the proposed activity.
6. The organization should have a positive “track record” regarding compliance with such requirements.
7. The prospective subrecipient should have adequate administrative and fiscal structures in place to deal with these guidelines (particularly record keeping).
8. The subrecipient should recognize its organizational weaknesses and have developed or be in the process of developing a plan for upgrading these aspects of its operations.
9. The organization should have qualified staffs for all the necessary functions associated with the proposed activity, with adequate staff time available.
10. If the organization does not have qualified staff or enough staff to adequately complete the proposed activities, the organization should have a plan to fill these gaps in personnel.
11. The organization will need to participate with the suburban Continuum of Care/Alliance to End Homelessness in Suburban Cook County.
12. The organization will need to participate in HMIS (or other data tracking system—for DV providers only)
13. The organization will need to involve people who are homeless or formerly homeless in policy decision making.
14. The organization will need to ask for a minimum of \$25,000 but will not be funded for any more than 20% of their operating budget.
15. The organization will need to be able to furnish matching funds at least 1:1 for duration of Program Year (October 1-September 30).
16. No more than 50% of the total award can be for staff salaries.
17. No more than 6 (six) total positions can be funded through staff salaries for ESG.

Application Acceptance and Review

The ESG program team, including the [ESG Program Manager] and [ESG Planners] will review each submission for minimum submission requirements, eligibility, and any additional criteria outlined in the program year NOFA. Any applications received after the deadline will not be considered for review.

Review of Applicability of Crosscutting Requirements

As part of the application review, the County will assess the impact of applicable federal regulations, including:

- **Environmental Review:** Physical improvements including acquisition, rehabilitation, conversion, or construction of property and other uses of funds that may have an effect on the environment will require additional environmental review. No work may be done on the project until an environmental review is complete.
- **Labor Standards:** Davis-Bacon wage compliance do not apply to ESG(CV)-funds.
- **Lead-Based Paint:** The Lead-Based Paint Regulations described in 24 CFR Part 35 require that lead hazard evaluation and reduction activities be carried out for all developments constructed before 1978 and receiving ESG(CV)-assistance. Capacity to comply with these requirements should be considered when awarding funds. For additional information, refer to the Lead Safe Housing Policy in Monitoring.

Meeting HUD Lead Based Paint Requirements

- a. A lead-based paint visual assessment must be completed on the following housing units constructed before 1978:
 1. Units housing families with children six (6) years of age or younger
 2. Units housing a pregnant person.
- b. Lead-based paint disclosures must be provided to client households in ALL housing units constructed prior to 1978. Under this requirement, lessors (property owners or managers) are required to provide tenants with both of the following:
 1. A disclosure form for rental properties disclosing the presence of known and unknown lead paint.
 2. A copy of the “Protect Your Family from Lead in the Home” pamphlet from <http://endhomelessness.org/wp-content/uploads/2017/03/1.14-HUD-Lead-Based-Paint-Brochure.pdf>
- c. It is the responsibility of the Subrecipient agency to ensure that tenants are provided with the required documents.
- d. Lead Screening Worksheet
 1. The Lead Screening Worksheet is intended to guide projects through the lead-based paint inspection process to ensure compliance with federal and state requirements. Project staff can use this worksheet to document any exemptions that may apply, whether any potential hazards have been identified, and if safe work practices and clearance are required and used. A copy of the completed worksheet along with any additional documentation should be kept in program participants’ files.

2. Completed Lead Screening Worksheets (Part 1 must be completed, at minimum) should be included in participant files. Additional information on the Lead-Based Paint Requirement can be found at: <https://www.hudexchange.info/resource/2118/guidelines-evaluation-control-lead-based-paint-hazards-in-housing/>

e. Inspection Requirements

Where applicable, a lead-based paint visual inspection must be completed prior to move-in and prior to the payment of any financial assistance, which includes rental assistance, utilities assistance, utility/security deposits, and rental/utility arrears. Visual Inspections should be completed for new units that clients are moving into and annually thereafter if clients are continuing to receive assistance and to reside in an applicable housing unit.

Inspector Requirements

The lead-based paint visual assessment must be conducted by a person who has completed the HUD Certified Visual Assessor training. This training can be found at: <http://hud.gov/offices/lead/training/visualassessment/h00101.htm>

f. Documentation of Completion of Visual Assessment

1. Evidence that staff successfully completed HUD Certified Visual Assessor training must be maintained in program files for review during site visits.

g. Discrimination of Services

1. Clients will not be denied assistance or services based on familial status or disability and that pre-1978 homes of families with children less than age six are being inspected and treated for lead hazards when triggered by the regulation.

i. Agency Case Managers will be required to submit annual verifications of their HUD Certified Visual Assessor certificates to their supervisors.

- **Displacement / Acquisition / Relocation:** Consistent with the other goals and objectives of Emergency Solutions Grant (ESG), the County must take all reasonable steps to minimize the displacement of persons (families, individuals, businesses, nonprofit organizations, and farms) as a result of a project assisted under Emergency Solutions Grant (ESG). If the proposed project has the potential to cause displacement, the County will review with their local HUD field office potential approaches to comply with all federal requirements (refer to 24 CFR 576.408 for more detail).
- **Section 3:** In conformance with the requirements of Section 3 of the Housing and Community Development Act of 1968, to the greatest extent feasible, the County must award contracts for work to be performed to eligible business concerns located in or owned by residents of the target area to ensure that the employment and other economic opportunities generated by federal financial assistance for housing and community development programs shall, to the greatest extent feasible, be directed toward low- and very-low income persons, particularly those who are recipients of government assistance for housing, except that homeless individuals have priority over other Section 3 residents in accordance with §576.405(c).

County Board Review

After the initial staff review, the [Deputy Director of Community Development] will summarize staff recommendations for review and approval by the Cook County Board of Commissioners. Recommended projects are presented to the Board during an annual meeting that typically occurs in June. After the Consolidated Plan and Action Plan public comment period ends the Board approves projects and submits the final resolution to Bureau of Economic Development. The final funding resolution is included the Annual Action plan prior to submittal to HUD for approval. The Annual Action plan must be submitted to HUD in August.

Obligations

After receipt of the final resolution, the [Deputy Director of Community Development] will assign specific staff to each project recommended for funding. [ESG Planner] will prepare and send Award Letters and Denial Letters to each subrecipient, as applicable. The award letter is the official document notifying the Subrecipient of its project selection and grant award amount.

Development of Annual Action Plan

ESG is submitted with the Annual Action Plan during years of execution. Most sections of the Annual Action Plan address the County's overall approach and use of HUD funding. ESG staff should review the proposed plan as a whole to ensure the planned use of ESG is accurately reflected. Staff should pay additional attention to the specific sections that focus heavily on ESG:

- AP-65 Homeless and Other Special Needs Activities
- AP-90 Program Specific Requirements
- Most current version of the adopted ESG standards.

Execution of Grant Agreement

HUD will submit the ESG grant agreement to the County upon approval of the Annual Action Plan. Within 180 days after the execution date of the HUD-County grant agreement, the County must execute its subrecipient grant agreements.

The HUD-County grant agreement will be routed to the Finance Program Manager who will coordinate execution and submittal to the issuing agency as required. The Finance Program Manager will retain an original paper set in the safe or other Finance file section for future audits as well as an electronic version in the shared drive accessible to Program Managers and Service Unit Managers. In addition, the Finance Program Manager sends a copy to the County's Budget Office for its records. Once the grant agreements are received/executed, the Finance Program Manager or designated Finance staff will confirm award amounts in the county accounting system.

Program Year Implementation

Environmental Review

The County will ensure an environmental review record (ERR) is completed for each proposed project before the execution of the subrecipient grant agreement. In most cases, ESG-funded projects are classified as Exempt. However, this review and determination must still be completed and filed in the project file.

The Compliance Specialist will utilize the application to develop a project scope for the purposes of the ERR. If additional information is needed, the [Compliance Specialist] will collaborate with the [ESG PLANNER] and the applicant to collect additional documentation needed to complete the ERR.

Preparation of Annual Monitoring Schedule

The ESG Program Manager will review the final scopes of work for funded projects and rank each funded project in terms of level of risk for non-compliance with program regulations. The following factors will be taken into account when ranking funded projects for risk:

- The size of the subrecipient's award in relation to the overall ESG(CV) allocation.
- The complexity of the project, including any additional compliance factors such as relocation, Section 3, or environmental mitigation.
- A subrecipient's prior performance with program compliance as an organization. This includes a review of past monitoring findings and concerns.
- A subrecipient's current staff in terms of experience with ESG and other federal programs.
- A subrecipient's experience with the proposed project.

After each award is provided a relative risk ranking, the [ESG Program Manager] will develop a general schedule and order for monitoring activities over the course of the program year. Awards that are considered to have a higher level of risk for non-compliance will be scheduled for onsite monitoring. If necessary, the [ESG Program Manager] may recommend the inclusion of Special Conditions to be added to a subrecipient agreement to require additional County approvals during the implementation of the award.

Subrecipient Agreements

The subrecipient agreement is the legally binding agreement between the County and the ESG subrecipient. The County has prepared a "boilerplate" subrecipient agreement template in accordance with § 24 CFR Part 576 where only the particulars of each subrecipient's scope of work and award must be provided.

- The [ESG Program Manager] will review the boilerplate with legal counsel before distributing it to each [ESG Planner].
- The [ESG Planner] will verify the environmental review record (ERR) for the project is completed.

- Each ESG Planner will complete the boilerplate agreement and submit it to the ESG Program Manager for review.
- Upon approval, the ESG Planner will send the draft agreement to each of its subrecipients for signature. The subrecipient will return two signed copies of the agreement as well as original resolutions and certifications required by the NOFA.
- Upon receipt of the signed subrecipient agreements, the [ESG Project Coordinator] verifies that the agreement was signed by the individual authorized in the application.
- The [ESG Planner] submits the subrecipient agreement package to the Cook County State's Attorney's Office for review and signature.
- The [County Clerk] reviews and signs the subrecipient agreement. One original of the fully executed agreement is maintained by the Clerk and the other original is returned to the [ESG Planner].
- The [ESG Project Coordinator] creates a copy of the fully executed agreement for the project file and returns a fully executed original of the subrecipient agreement and an "Authorization to Incur Grant Costs" to the subrecipient.
- If the subrecipient is not registered as a vendor with the County, the [ESG Project Coordinator] will also provide the requisite vendor forms for processing payments to the subrecipient.

Internal Finance Setup (Lotus Approach)/ FFATA Report

County Finance will record the subrecipient award as needed in the county financial system and report the award, as applicable, in per the Federal Funding Accountability and Transparency Act (FFATA) at the end of each month a subrecipient agreement is executed.

IDIS Online Program Year Set Up

The [Administration Assistant III]- Program Manager] is responsible for completing the setup of the ESG program each program year.

- Upon receipt of the annual allocation from HUD in the IDIS Online system, the [ESG Administration Assistant III] will add the proper number of ESG activities². For ESG, activities represent an eligible use of funding (i.e. Shelter, Outreach, Prevention, Administration).
- If applicable, the [Administration Assistant III] will create the ESG Admin subfund in order to fund the ESG administrative activity.
- The [Administration Assistant III] will use Activity Funding to obligate the new allocation to each IDIS activity. Funding must be added separately for each subrecipient.

² Please refer to the most current ESG guidance for IDIS Online available on HUD Exchange.

Subrecipient Oversight

After the Authorization to Incur Grant Costs is issued to the subrecipient, the Bureau of Economic Development assumes an oversight role of funded projects (review and processing of pay requests, performance tracking, and compliance reviews) as well as grant-wide administrative and reporting duties (CoC coordination, match compliance).

An ESG Planner is assigned to each funded subrecipient and is primarily responsible for the review of all pay requests and performance reports. The ESG Planner is primarily responsible for monitoring the program compliance through desk reviews, onsite field visits, and the provision of technical assistance as needed.

The following monitoring objectives should serve as basis for monitoring activities:

1. To determine if a subrecipient is carrying out its individual activities in a manner that complies with all federal requirements and the requirements of the subrecipient Agreement.
2. To determine if a subrecipient is carrying out its activities in a timely manner, in accordance with the schedule included in the Agreement.
3. To determine if a subrecipient is charging only reasonable and necessary costs to the project that are eligible for ESG regulations, and that the costs are supported by documentation.
4. To determine if a subrecipient is conducting its activities with adequate control over program and financial performance, and in a way that minimizes opportunities for waste, mismanagement, fraud, and abuse.
5. To identify potential problem areas and to assist the subrecipient in complying with applicable laws and regulations.
6. To ensure that required records are maintained to demonstrate compliance with applicable regulations.

Communication

Throughout the term of the subrecipient agreement, the ESG Planner will maintain ongoing communication with the subrecipient via phone and email. All official correspondence (i.e. Intent to Monitor Letters, Noncompliance with Agreement) shall be mailed to the address specified in the subrecipient agreement with a copy placed in the project file.

Performance Reports

Subrecipients are required to submit performance reports throughout the period of performance. Reports are due 30 days after the close of each quarter.

Homeless Management Information System (HMIS) data must be packaged and submitted per current HUD rules as part of the annual CAPER report. HMIS reporting requirements must be completed within 45 days of the close of the program year. All subrecipients who are not able to provide accurate and substantially complete HMIS reports to the County in a timely fashion will be forwarded to the ESG Program Manager for resolution.

Pay Requests

Subrecipients must submit requests for reimbursement on a quarterly basis (at least every 3 months after the issuance of the **Notice to Incur Grant Costs**). Requests must include all necessary drawdown forms and support documentation (for example: bills from utility companies, eviction notices, receipts, other invoices, etc.). Failure to submit these documents will result in the return of the pay request to the subrecipient for re-submission. ***The County will process all completed pay requests within thirty days of receipt.***

All pay requests must be submitted no later than December 1st following the end of the Program Year. All expenses not incurred by September 30th may not be reimbursed (refer to section on Amendments). Failure to incur costs by this deadline may result in a loss of funds.

If a subrecipient fails to request reimbursement within the specified timeframe, the [ESG Planner] will contact the organization to offer technical assistance and to explain to the organization that they need to submit drawdowns per the subrecipient agreement.

Pay Request Packet

Subrecipients request reimbursement for ESG awards by submitting a pay request packet with the following elements.

1. **Cover Letter.** The cover letter should include the requested amount to be drawn from ESG. Please include the Project Number. This must be signed and on agency letterhead.
2. **Subrecipient Reimbursement Certification Form.** This form should be filled out completely. The amount must be the same as the amount listed on the cover letter. An original or electronic signature is required.
3. **Drawdown Summary Form:** Used to track the program budget including the amount drawn per line item. No additional drawdown summary forms are required—only one for the component for which the subrecipient is drawing down. An original or electronic signature required.
 - a. Homelessness Prevention
 - b. Rapid Re-housing
 - c. HMIS
 - d. Street Outreach
 - e. Emergency Shelter
4. **Exhibit 1:** Exhibit 1 is used to detail staff salaries allocated to ESG and provides a summary of ESG (and non-ESG) hours worked per staff person and calculation of the % of pay to be reimbursed.
 - a. Each pay period should be on a separate line.
 - b. Each Exhibit 1 should include only one component.
 - c. Subrecipient must indicate if hours are based on actual hours worked, budgeted estimates, or another method of allocation. Any allocation other

than actual hours worked must be described in the cover letter or other supporting documentation.

- d. If a staff member only works on one ESG component (i.e. Outreach), a timesheet is not needed.³
5. **Exhibit 1B: Activity Sheet.** This form is to be submitted for each employee, per each pay period in the reimbursement request.
 - a. Submit the appropriate 1B for the pay schedule for the employee (monthly, semi-monthly, or bi-weekly).
 - b. Use one form for multiple funding sources if applicable (ex. employee salary funded by both CDBG and ESG).
 - c. Payroll Journal: A copy is required for each employee, for each pay period reimbursement is requested.
6. **Exhibit 2:** For all items other than salaries—including shelter utilities, security deposits, rental payments to landlords, shelter supplies, shelter food costs, and all other eligible costs that do not fall under ‘Staff Salaries’ or ‘Housing Relocation and Stabilization Services. An invoice for service/bill/receipt/copy of lease and a copy of the cancelled check or bank statement showing that the funds were expended is required when submitting this form.
7. **Rental Assistance Agreement(s), if applicable.** Please include the rental assistance agreement when drawing down for rental assistance (both tenant based rental assistance and rent arrears).

Submittal and Review Process

1. Subrecipients will submit requests for payments directly to centralized email that is monitored by [Administrative Assistant]. [Administrative Assistant] will forward requests within one business day.
2. [Planner] must conduct an initial review for accuracy and completeness within five business days of the submission.
 - a. [Planner] will confirm all required forms are included and complete, signed where required by a person listed on the ESG Authorized Signature Form, and are supported by necessary documentation such as receipts, cancelled checks, etc.
 - b. [Planner] will review forms for consistency.
 - c. [Planner] will review progress toward project milestones.
 - d. [Planner] will review requests to ensure reimbursements align with the Project Summary Line-Item Budget [Exhibit D of Subrecipient Agreement].

³ 2 CFR 200.430(i)(1)(vii) Support the distribution of the employee's salary or wages among specific activities or cost objectives if the employee works on more than one Federal award; a federal award and non-Federal award; an indirect cost activity and a direct cost activity; two or more indirect activities which are allocated using different allocation bases; or an unallowable activity and a direct or indirect cost activity.

- e. [Planner] will ensure that pay requests that include reimbursement for staff costs comply with guidance on recordkeeping and allocation in “Information Sheet on Staff Cost Allocation”. For staff costs, the County will only accept budgeted estimates if the subrecipient agency can demonstrate (1) a rational basis for the estimates; (2) there will not be significant changes to staff roles and responsibilities for the term of the award; and (3) the agency has established a process to reconcile estimates with actual time worked before the final pay request is submitted. Any allocation other than actual hours worked must be described in the cover letter or other supporting documentation. If a staff person only works on one ESG program, the subrecipient’s signed certification is sufficient documentation for cost allocation⁴.
3. All incomplete submittals will be returned to the subrecipient with a list of deficiencies.
 4. Upon approval, [Planner] will submit the pay package to the Deputy Director. The Deputy Director will have five business days to review, and spot check the request. Upon approval, the Deputy Director will sign and date the request and forward the request to the Finance Division. Deputy Director will ensure the pay request is loaded to the appropriate location in the shared directory for recordkeeping.
 5. Within three business days, the Grant Analyst in the Finance Division will review the pay request for available funds per the information in the County’s accounting system (Oracle) and will prepare the 29a voucher. Upon completion, the Grant Analyst will notify the ESG Administrative Assistant.
 6. The ESG Administrative Assistant will prepare the pay request for the Director’s signature in Oracle.
 7. The Director will review and approve the pay request in Oracle.
 8. The Comptroller will process checks and payments for all approved pay requests every Tuesday and Thursday.

Amendments

If necessary, to serve program participants and clients better, subrecipients may transfer funds from one line to another line. To do so, the subrecipient will need to submit a line-item change request. Line-item change request letters need to indicate the following information:

- the amount the subrecipient is requesting to transfer, the original line the amount was awarded in, the requested line for the funds to be transferred to, and a brief reason for the request.
- Line-item transfer request letters need to be signed and sent on the organization’s letterhead. These letters may be sent as emailed pdfs or mailed as paper copies. In

⁴The subrecipient must certify that their financial management system, internal control and records are in compliance with the standards at 2 CFR 200.430(i).

some cases, it may be possible to transfer funds from one line in a component to another line in a different component.

- Subrecipients are encouraged to attempt to draw down funds from within one component first, before attempting to transfer funds from one component to another, however, and subrecipients should speak with their [Planner] before submitting this request.

[Change Orders](#)

Subrecipients may submit a written request to amend the scope of its agreement. Any changes must receive prior county approval before the subrecipient amends the scope. "Prior County approval" means that written approval must be given by the County before any funds, County or matching, are committed. All requests for change orders must be submitted on the County change order form with a complete explanation justifying the request. An explanation in greater detail may be requested. All amendments must be finalized and signed by both the subrecipient and the County.

[Extensions](#)

With prior approval, and in limited cases, subrecipients may ask for and receive an extension for a short time beyond the initial one year term. A subrecipient must ask for an extension at least 60 days before the end of the agreement term. To be considered for an extension, a subrecipient must send in a signed letter on the organization's letterhead to their Planner. The letter must briefly detail why the extension is needed and the date for which they need the project extended until. The planner will then notify the subrecipient about whether their extension was approved and will send the subrecipient a letter.

Match

The County will review compliance with ESG match requirements at three different points in the grant cycle, at a minimum: as part of the application, six months after the Notice to Incur Grant Costs, and at the close of the program year. The County may also include a further review of matches as part of its onsite monitoring visit.

- As part of the program application, the applicant will be required to identify both the expected source and eligible use of ESG match listed on the Match Certification Form and the Line-Item Budget. The amount of match must equal or exceed the amount of ESG requested. The application will include a certification that the applicant acknowledges the match requirements, and that the applicant must adopt and follow a policy for determining the value of non-cash contributions. This information will be included as part of the subrecipient agreement as well.
- Six months after the issuance of the Notice to Incur Grant Costs and as part of the final pay request/grant closeout, the ESG Program Manager will request a summary of match documentation from each subrecipient. Subrecipients shall use the Match Reporting Form to submit this information. Subrecipients may be requested to provide supporting documentation from their internal accounting records to support the information on the Match Reporting Form at the time of submittal as part of an onsite monitoring visit.

All documentation from each subrecipient demonstrating the required matching funds will be maintained in the subrecipient's project file.

- Upon receipt of the Match Reporting Form, the [ESG Program Manager] will review all of the submitted match documentation for accuracy and completeness, including a review for the following:
 - Do the records document both the source and eligible use of ESG matching contributions?
 - Do the records indicate the program year grant for which each matching contribution was counted?
 - Do the records explain how the value placed on third-party, noncash contributions was derived?
 - If volunteer services are counted as a match, was the match supported with documentation and allocated using the same methods that the organization uses to support the allocation of regular personnel costs?
- The County Deputy Director will work with the ESG Program Manager to populate the Match Summary by Program Year that details the amount of match by allocation, subrecipient, source and eligible use.
- Any HUD-approved waiver of match requirements will be documented in the project file.

Onsite Monitoring

General

ESG Planners shall conduct onsite monitoring visits for subrecipients who ranked relatively highly for potential non-compliance. Onsite monitoring visits will cover, at a minimum, the following subrecipient topics:

- Eligibility Verification and documentation
- Service delivery activities
- Source Documentation
- Any topics that the ESG Manager feels should be included based on the risk analysis

Process

Offsite File Review

In preparation for the monitoring visit, the ESG Planner shall review all the project file and the results of past monitoring visits and correspondence for the organization available in-house.

- Review subrecipient's application for ESG Funding

- Review the subrecipient agreement.
- Review any progress reports or quarterly performance reports submitted during the current program year.
- Review any drawdown requests made to date.
- Review documentation of previous monitoring visits and copies of any audits by HUD or any independent party
- Prepare all monitoring checklists, as applicable.

Notification Letter

- ESG will prepare a Intent to Monitor letter that confirm the dates and the scope of the monitoring;
- The letter will provide a description of the information to review during the visit, the expected duration of the monitoring, logistical requirements, and any specific members of the subrecipient staff who will need to be available.

Entrance Conference

- The purpose of the entrance conference is to provide subrecipient staff with a clear understanding of the purpose, scope and schedule of the monitoring.

Case file review, documentation assessment, data acquisition, and analysis

The documents reviewed during an on-site monitoring visit are, but not limited to the following: application, subrecipient agreement, notice to proceed, environmental review documentation (if applicable), monitoring documentation (monitoring notification, or any correspondence concerning prior monitoring of the project), performance report, project financial audits, project correspondence, drawdown documentation, client and volunteer sign-In sheets, and client files.

At fiscal year-end, all subrecipients must ensure that an annual audit is done (if applicable under OMB A-133 standards). Subrecipients contact with an independent Public Accounting Firm licensed in the state of Illinois, to audit year-end financial statements and to prepare an OMB A-133 audit of federal awards as required for entities receiving over \$750,000 in federal funds (if applicable). The completed financial statement and OMB A-133 audit is submitted to the Federal Audit Clearinghouse Bureau of the Census and to federal funding agencies by the due date, including extensions. Information from current and prior A-133 audits is accessible online through the Federal Audit Clearinghouse website at: <https://facweb.census.gov/uploadpdf.aspx>.

Exit Conference

The purpose of the exit conference is to present preliminary results of the monitoring visit, provide the subrecipient to correct any misconceptions or misunderstandings, secure additional information from subrecipient staff to clarify or support their position, and provide an opportunity for subrecipient staff to discuss potential corrective actions for any deficiencies that the subrecipient agrees with.

[Follow-up Monitoring Letter](#)

Within 30 days of the monitoring visit, the ESG Planner will prepare and mail a monitoring letter that summarizes any deficiencies found during the monitoring visit. Deficiencies may be either a concern or a finding. A concern is where the County feels there is a possibility for non-compliance based on lack of recordkeeping or policies and procedures. A finding is the determination that the funded project is out of compliance with one or more ESG regulations. The ESG Planner will recommend one or more corrective actions to address each concern or finding.

Results letter must be mailed within 30 days after monitoring visit. All findings will be mailed to Subrecipients via certified mail. A copy must be placed in the project file as well. Subrecipients

must confirm via written response within 10 days upon receipt of monitoring finding letter. ESG Planners will continue to work with the subrecipient until all concerns or findings have been addressed. All corrective actions shall be adequately documented with supporting documentation. All correspondence shall be placed in the project file.

[Sanctions and Termination](#)

In cases where the subrecipient is unable or unwilling to take the necessary corrective actions to address a concern or a finding, at a minimum, the department has the option of withholding payment when compliance or performance issues are involved. Before payments are withheld, progressive sanctions will be implemented in stages as follows:

Stage I intervention strategies for initial problems or issues include:

- plan an intervention strategy with the subrecipient that involves additional training or technical assistance
- require more frequent and more thorough reporting by the subrecipient

Stage II intervention strategies leading to termination:

- Remedies for noncompliance may impose additional conditions, including, conducting frequent on-site follow-up monitoring of the subrecipient if a grantee fails to comply with federal regulations, or the terms and conditions of an award. If Cook County determines that noncompliance cannot be remedied by imposing additional conditions, the County may take one or more of the following actions, as appropriate in the circumstances:
 - restrict the subrecipient payment requests
 - impose probationary status

Stage III intervention strategies leading to termination: Strategies include withholding cash payments pending correction of the deficiency by the nonfederal entity or more severe enforcement action by the federal awarding agency or passthrough entity. Staff can also disallow (that is, deny both use of funds and any applicable matching credit for) all or part of the cost of the activity or action not in compliance.

- suspend the subrecipient (or the activity being carried out)
- wholly or partly suspend or terminate the federal award.
- do not renew the subrecipient the next program year
- terminate the subrecipient in the current program year Require repayment of grant funds already expended.
- initiate legal action.

The award may be terminated in whole or in part if a subrecipient fails to comply with the terms and conditions of an award. With the consent of the sub, Cook County and the subrecipient must agree upon the termination conditions, including the effective date and, in the case of partial termination, the portion to be terminated. The subrecipient sends Cook County written notification setting forth the reasons for such termination, the effective date, and, in the case of partial termination, the portion to be terminated. However, if the County determines in the case of partial termination that the reduced or modified portion of the award or subaward will not accomplish the purposes for which the award was made, the County may terminate the award in its entirety. When an award is terminated or partially terminated, both the County and the subrecipient remain responsible for compliance with the requirements closeout and post-closeout adjustments and continuing responsibilities.

The grantee will have 30 calendar days from the date of the notification to submit a written appeal of the decision. Appeals are limited to termination of grant. Renewal or continuation of grant is not subject to appeal. The appeal must be delivered in person or by certified mail, postage prepaid with a return receipt requested. Termination of a grant will result in the grantee being ineligible for consideration for current grant Request for Proposals/Notice of Funding Opportunities and ineligible for consideration for future grant Requests for Proposal/Notice of Funding Opportunities for a minimum period of five years from the date of the Notification of termination action or longer at the discretion of Cook County and Housing and Urban Development.

Funding in the subsequent years beyond the term of the grant will be contingent upon compliance with federal and state law, regulations, administrative rules, terms and conditions of the award, passage of sufficient appropriations for the program, and satisfactory performance in the preceding grant period. Renewal decisions are at the sole discretion of Cook County, and the receipt of an award in a current or previous term does not create any right to or expectation of renewal in a subsequent term. Grantees will be notified of non-renewal determinations by Cook County/Department of Planning in writing.

Specific Monitoring Topics

Conversion and Rehabilitation Standards

Currently DPD are not using ESG funding for conversion and rehabilitation. Any building for which Emergency Solutions Grant (ESG) funds are used for conversion, major rehabilitation, or other renovation, must meet state or local government safety and sanitation standards, as applicable, and the following minimum safety,

sanitation, and privacy standards. The ESG Planner will coordinate with the ESG Program Manager to determine rehabilitation standards on a case-by-case basis in collaboration with the local government with jurisdiction of the shelter in question.

Lead Safe Housing Requirements

As a recipient of the Emergency Solutions Grant (ESG), Cook County is required to ensure all ESG-funded projects are following the Lead Safe Housing Rule, including disclosure, inspections, and remediation where necessary. The Lead Safe Housing Rule is based on the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. 4821-4846), the Residential Lead-Based Paint Hazard Reduction Act of 1992 (42 U.S.C. 4851-4856), and implementing regulations in 24 CFR part 35, subparts A, B, H, J, K, M, and R. These regulations apply to all shelters assisted under ESG program and all housing occupied by program participants. In meeting HUD Lead-based Paint Requirements.

- a. A lead-based paint visual assessment must be completed on the following housing units constructed before 1978:
 1. Units housing families with children six (6) years of age or younger
 2. Units housing a pregnant person
- b. Lead-based paint disclosures must be provided to client households in ALL housing units constructed prior to 1978. Under this requirement, lessors (property owners or managers) are required to provide tenants with both of the following:
 1. A disclosure form for rental properties disclosing the presence of known and unknown lead paint.
 2. A copy of the “Protect Your Family from Lead in the Home” pamphlet from <http://endhomelessness.org/wp-content/uploads/2017/03/1.14-HUD-Lead-Based-Paint-Brochure.pdf>
- c. It is the responsibility of the assigned case manager to ensure that tenants are provided with the required documents.
- d. Lead Screening Worksheet
 - The Lead Screening Worksheet is intended to guide projects through the lead-based paint inspection process to ensure compliance with federal and state requirements. Project staff can use this worksheet to document any exemptions that may apply, whether any potential hazards have been identified, and if safe work practices and clearance are required and used. A copy of the completed worksheet along with any additional documentation should be kept in program participants’ files.
 - Completed Lead Screening Worksheets (Part 1 must be completed, at minimum) should be included in participant files. Additional information on the Lead-Based Paint Requirement can be found at: <https://www.hudexchange.info/resource/2118/guidelines-evaluation-control-lead-based-paint-hazards-in-housing/>

- Subrecipients must document and submit records of four notification requirements: Occupants, owners, and purchasers must receive the EPA/HUD/Consumer Product Safety Commission (CPSC) lead hazard information pamphlet, or an EPA-approved equivalent.
- Property owners must provide subrecipient owners or lessees with available information or knowledge regarding the presence of lead-based paint and lead-based paint hazards prior to selling or leasing a residence.
- Subrecipients must document that the relevant disclosure has been provided.
- Subrecipients and occupants must be notified of the results of any lead hazard evaluation work or the presumption of lead-based paint or lead hazards.
- Occupants, owners, and purchasers must be notified of the results of any lead hazard reduction work. The purpose of the assessment is to determine the presence of lead or lead hazards in a property. The assessment activity required depends on the nature of the activity funded and the amount of Federal funding. Assessment methods include visual assessments, paint testing, and risk assessments. Each of these evaluation activities must be performed by properly trained and accredited professionals.

The purpose of lead hazard reduction is to provide safe housing through the mitigation and removal of lead. The reduction activity required depends on the nature of the activity funded and the amount of Federal funding. Reduction methods include paint stabilization, interim controls, standard treatments, and abatement. All lead hazard reduction work must be done by properly trained professionals.

- Clearance must be performed by a certified clearance examiner to demonstrate that hazards have been properly addressed. Additionally, all reports such as abatement reports, clearance reports, related to reduction and abatement activities must be submitted to Deputy Director for record keeping purposes.
- Ongoing maintenance is required for rental activities. Ongoing maintenance includes periodic visual assessments to determine the presence of new lead based paint hazards and the mitigation of these hazards. All reports related to ongoing maintenance must be maintained on file by Subrecipients and made available to the Deputy Director upon request for record-keeping purposes.
- Failure to comply with the lead-based paint requirements will be subject to sanctions authorized under the Federal funding programs providing assistance to the property, and violations may be subject to other penalties available under state or local law.
- Recipients must comply with other regulations – Federal, State, and local – that apply to lead-based paint hazard evaluation and reduction. When multiple regulations cover a program activity, Recipients must comply with the most stringent requirement.
- All lead-based paint activities must be performed in accordance with other applicable Federal laws and authorities.

Record-keeping: There are numerous records that Recipients must keep to document

that they conducted the required lead hazard response activities.

- Recipients must keep a copy of each notification, lead hazard evaluation report, lead hazard reduction documentation (such as job specifications), and clearance or abatement report for at least five years.
- All notifications and reports related to lead-based paint including lead hazard reduction and abatement activities must be submitted to Deputy Director for record keeping purposes.
- Recipients must keep ongoing maintenance records and records of relevant building operations for use during reevaluations.
- All reports related to ongoing maintenance must be maintained by Subrecipients and made available to Cook County for inspection upon request.
- Inspections must be conducted in accordance with the 2017 HUD Guidelines for the Evaluation and Control of Lead-Based Paint Hazards in Housing). Results of additional test(s) by a certified lead-based paint inspector may be used to confirm or refute a prior finding.
- Exemptions shall expire for a dwelling unit no later than 100 days after the initial payment or assistance. Performance of an evaluation or lead-based paint hazard reduction or lead-based paint abatement on an exterior painted surface as required under this part may be delayed for a reasonable time during a period when weather conditions are unsuitable for conventional construction activities.

[Lead Paint Hazards](#)

Lead is highly toxic and affects virtually every system of the body. While adults can suffer from excessive lead exposures, the groups most at risk are fetuses, infants, and children under age 6. At high exposure levels, lead poisoning can cause coma, convulsions, and death. At low levels, the neurotoxic effects of lead have the greatest impact on children's developing brains and nervous systems, causing reductions in IQ and attention span, reading, and learning disabilities, hyperactivity, and behavioral problems.

[Quick Facts](#)

- The vast majority of childhood lead-poisoning cases go undiagnosed and untreated, since most poisoned children have no obvious symptoms. As a result, childhood lead poisoning is one of the most common environmental diseases of young children.
- Lead-based paint in housing is the major remaining source of exposure and is responsible for most cases of childhood lead poisoning today. HUD estimates that over 60 million occupied homes, or approximately 80 percent of all homes built before 1980, have some lead-based paint. Generally, the risk of lead paint is greater based on the age of the home. The use of lead in paint was highest in housing built before 1960.
- Higher childhood blood lead levels are associated with lower household income, residence in large urban areas, non-Hispanic African American race, and living in older homes.

[Additional Resources](#)

To learn more about the dangers of lead-paint, please visit HUD's website for [Healthy Homes and Healthy Families](#).

General Policy

Before issuing the Notice to Incur Grant Costs, the County will work with each ESG-funded Service Provider to determine the applicability of the Lead Safe Housing Rule. In general applicability is based on the eligible use of ESG funds.

- **Emergency Shelter Operations**
The Lead Safe Housing policies for emergency shelter operations are provided below. The County will document the age of the properties proposed for use and the household type to determine applicability.
- **Homeless Prevention and Rehousing (Rental Assistance)**
Most instances of homeless prevention and rehousing is considered tenant based rental assistance for the purposes of the Lead Safe Housing Rule and is subject to Subpart M -
Tenant-Based Rental Assistance. The Lead Safe Housing Rule is applicable to assistance to households with children under the age of six that will extend beyond 100 days.
- **Shelter Renovation (Rehabilitation)**
For any proposed shelter renovation, the County will work with the subrecipient to achieve compliance on a case by case basis.

[Shelter Operations - Applicability](#)

In general, the Lead Safe Housing Rule provides exemptions for properties built after 1978, zero- bedroom dwelling units, single room occupancy (SRO) dwellings, and properties that have been inspected in accordance with § 35.1320(a) and found to have no lead-based paint. Hotels, motels, and other short-term non-residential properties (i.e. churches) used as emergency shelters may also be exempt⁵.

The policies included herein are only applicable to emergency shelters built before 1978 that do not qualify for one of the exemptions listed above. Shelters that serve households with children under the age of six must adopt and adhere to the lead-safe policies herein regardless of the length of the occupancy.

[Shelter Operations Policy](#)

1. The Service Provider will adopt and follow a written building operations policy that includes ongoing lead-based paint maintenance activities into regular building operations. At a minimum, this includes visual inspections every 12 months **and** at unit turnover, stabilization practices as described herein, and written notice to occupants asking them to report any deteriorated paint.
2. Upon occupancy, the Service Provider provides new occupants the [“Protect Your Family” pamphlet](#) at the time of move-in or lease up. The link provides versions in

- English, Spanish, and other languages. The Service Provider shall complete the **Disclosure of Information on Lead-Based Paint and/or Lead-Based Paint Hazards** form (Exhibit A) and require the occupant to initial, sign and date the form. One copy of the form shall be provided to the occupant and one copy shall be maintained for the project file.
3. Within 30 days of receiving the “Notice to Incur Grant Costs⁶”, the Service Provider will conduct a visual assessment on all surfaces to identify deteriorated paint. The visual assessment will include all dwelling units, common areas, and exterior surfaces (35.1015). The Visual Assessment must be completed by a person who has completed the online [Visual Assessment Training](#) offered by HUD. The project file should contain a completed Visual Assessment Form (Exhibit B) and the training certificate for the person who conducted the assessment.

⁵ If a non-residential property is consistently used to provide emergency shelter, the County may require compliance with the Lead Safe Housing Rule.

⁶ Service Providers may perform the visual assessment on an alternate schedule but must perform the assessment at least every 12 months.

If any deteriorated paint is found in the visual assessment:

- The Service Provider must notify the County within 3 working days.
- The Service Provider has the option of testing the deteriorated areas for the presence of lead paint. If tested paint is not lead-based, safe work practices, clearance, and a notice of lead hazard reduction are not required. A notice of lead hazard evaluation is required when performing testing.
- The County and Service Provider will determine
 - If the scope of the work exceeds the de minimis thresholds. Safe work practices and clearance are not required for disturbance of paint in amounts below the de minimis threshold.
 - the level of occupant protections necessary, including relocation.
- The Service Provider will stabilize the painted surface. The stabilization work must be performed by workers trained in lead safe work practices (RRP training and certification) or supervised by a lead abatement supervisor who is also a certified renovator.
- The Service Provider will procure a certified lead professional to conduct a clearance examination when work is complete.
- The Service Provider will provide occupants a Notice of Lead Hazard Reduction within 15 calendar days of the clearance examination results.
- The Service Provider will maintain documentation for all of the above steps in the project file.

In the event that evidence of lead paint is discovered in a unit where children the age of 6 years or under and /or a pregnant woman resides; and is reported to Cook County DPD; this information is then reported to the Cook County Department of Public Health (CCDPH). The Lead Poisoning Prevention Program is a collaborative effort between the following CCDPH departments: (1) Environmental Health Services: This department provides lead risk assessments in the homes of children identified as having an elevated blood-lead level. Lead risk assessors: identify both lead-based paint and non-lead based paint hazards in the home; issue orders to correct lead-based paint hazards; monitor and provide guidance to property owners and contractors as they work to correct lead-based paint hazards; conduct testing to confirm that a home has been made 'lead safe'; and respond to complaints of improper removal of lead-based paint., (2) Public Health Nursing: This department provides case management for young children with elevated blood-lead levels , and (3) Lead Poisoning Prevention and Healthy Homes: This department works with the state to ensure accurate reporting of children with elevated blood-lead levels; provides education and outreach to parents, schools, healthcare, childcare providers, and community-based organizations; works to advance policies that support healthy homes; and administers the Lead Prevention Program grant, which

provides funds to property owners to remediate identified lead hazards. Below is an overview of all lead services and each department's role in helping to prevent, reduce and/or eliminate the effects of childhood lead poisoning. For more information about CCDPH lead poisoning prevention services, please call 312-515-0366 or visit the Lead Poisoning Prevention page.

[Rental Assistance - Applicability](#)

The Lead Safe Housing Rules for rental assistance only applies in cases where the dwelling unit was built before 1978, the household has a child under 6 years of age, **and** assistance will be provided for a period exceeding 100 days. Each Service Provider must determine applicability of the Lead Safe Housing Rule and maintain documentation in the project file.

[Rental Assistance Policy](#)

1. Upon approval of rental assistance, the Service Provider will provide their client with the "Protect Your Family" pamphlet. An acknowledgement of receipt of the pamphlet signed and dated by the client should be maintained in the project file.
2. Before occupancy or within 15 days of approval of rental assistance, and every 12 months thereafter, the Service Provider will conduct a visual assessment on all surfaces to identify deteriorated paint. The visual assessment will include the dwelling unit, common areas, and exterior surfaces (35.1015). Common areas servicing a dwelling unit include those areas through which residents pass to gain access to the unit and other areas frequented by resident children of less than 6 years of age, including on-site play areas and child care facilities. The Visual Assessment must be completed by a person who has completed the online Visual Assessment Training offered by HUD. The project file should contain a completed Visual Assessment Form (Exhibit B) and the training certificate for the person who conducted the assessment.

If any deteriorated paint is found in the visual assessment:

- The Service Provider must notify the County and the Property Owner within 3 working days of the visual assessment.
- The County and Service Provider will determine
 - If the scope of the work exceeds the de minimis thresholds. Safe work practices and clearance are not required for disturbance of paint in amounts below the de minimis threshold; and
 - the level of occupant protections necessary, including relocation.
- The Property Owner has the option of testing the deteriorated areas for the presence of lead paint. If tested paint is not lead-based, safe work practices, clearance, and a notice of lead hazard reduction are not required. A notice of lead hazard evaluation is required when performing testing.
- The Property Owner will stabilize the painted surface before occupancy or within 30 days of notification of the owner of the results of the visual assessment⁷. The stabilization work must be performed by workers trained in lead safe work practices

(RRP training and certification) or supervised by a lead abatement supervisor who is also a certified renovator.

- The Property Owner will procure a certified lead professional to conduct a clearance examination when work is complete.
 - The Property Owner will provide occupants a Notice of Lead Hazard Reduction within 15 calendar days of the clearance examination results.
 - The Service Provider will maintain documentation for all of the above steps in the project file.
3. If the Property Owner is notified a child in a client household has an elevated blood lead level, the Property Owner will notify the public health department and the Service Provider within 5 business days of receiving notification.
4. If the Service Provider is notified a child in a client household has an elevated blood lead level:
- If the information is received from a source other than a medical health care provider or public health department, the Service Provider will verify the information with the public health department or other medical health care provider.
 - The Service Provider will notify the County, the HUD field office and the HUD Office of Lead Hazard Control and Healthy Homes within 5 business days of being so notified.
 - The Service Provider will coordinate with the public health department and the property owner to complete an environmental investigation⁸ of the unit within 15 days of notification. Upon completion of the investigation, the Service Provider shall immediately provide the report of the environmental investigation to the Property Owner.
- Within 30 calendar days after receiving the report, the Property Owner shall
 - Address identified lead-based paint hazards in accordance with § 35.1325 or § 35.1330;
 - Document clearance with a report in accordance with § 35.1340; and
 - Notify building residents of any lead hazard evaluation and reduction activities;
 - Conduct a risk assessment in accordance with § 35.1320(b) within 30 days if other assisted dwelling units are within the same property; and
 - Provide documentation to the Service Provider within 10 days of completing each of the above actions.

⁷ A total of 90 days after notification may be provided to an owner to complete paint stabilization and clearance. Any extension must be for reasonable cause and well documented.

Exhibits

- Disclosure of Information on Lead-Based Paint and/or Lead-Based Paint Hazards
- Visual Assessment Form

Habitability Standards – Emergency Shelter Operations

For all projects that include emergency shelter operations, the ESG Planner will review the shelter to ensure it satisfies the requirements of 24 CFR 576.403(b), including: Structure and materials; Access; Space and security; Interior air quality; Water supply; Sanitary facilities; Thermal environment; Illumination and electricity; Food preparation; Sanitary conditions; and Fire safety.

Habitability Standards – Permanent Housing

As previously mentioned, households that are assisted in any way through ESG Homelessness Prevention funds or Rapid Re-housing (whether through prevention services, financial assistance, rental assistance, or any combination thereof) will need to complete habitability and lead screening documentation (see Appendix), whether the household is remaining in their current dwelling unit or whether they are receiving ESG funds to move to a new unit.

Habitability standard inspections and Lead-Based Paint Inspections do not have to be performed by a third party. ESG project staff can conduct the inspections. If a program participant is moving in to a unit and using another subsidy program that requires an inspection, staff from the other program may conduct the inspection, as long as they follow the minimum habitability standards required by ESG. (The most common example of this is when a program participant receives security deposit assistance to move into a housing choice voucher unit that has already undergone an inspection through the housing authority.) Inspections must be conducted upon receiving assistance and then on an annual basis for the term of ESG assistance.

⁸ An environmental investigation is the process of determining the source of lead exposure. It includes completion of a questionnaire, comprehensive environmental sampling, case management, and other measures, in accordance with chapter 16 of the HUD Guidelines for the Evaluation and Control of Lead-Based Paint Hazards in Housing.

General Policies – Use of HMIS

The recipient must ensure that data on all persons served and all activities assisted under ESG are entered into the applicable community-wide HMIS in the area in which those persons and activities are located, or a comparable database, in accordance with HUD's standards on participation, data collection, and reporting under a local HMIS. If the subrecipient is a victim service provider or a legal services provider, it may use a comparable database that collects client-level data over time (i.e., longitudinal data) and generates unduplicated aggregate reports based on the data. Information entered into a comparable database must not be entered directly into or provided to an HMIS.⁹

General Policies – Compliance with ESG Standards

The recipient must have adopted policies and procedures and evidence within their project files that the project is administered in compliance with the following adopted ESG standards:

- Eligibility Determination
- Intake and Assessment
- Confidentiality
- Outreach
- Shelter Operations and Services
- Homeless Prevention
- Rapid Rehousing
- Homeless Participation
- Discharge Coordination

General Policies – Record Retention

The Subrecipient shall retain all financial records, supporting documents, statistical records, and all other records pertinent to the Agreement for a period of four (4) years. The retention period begins on the date of the submission of the Grantee's annual performance and evaluation report to HUD in which the activities assisted under the Agreement are reported on for the final

time. Notwithstanding the above, if there is litigation, claims, audits, negotiations or other actions that involve any of the records cited and that have started before the expiration of the four-year period, then such records must be retained until completion of the actions and resolution of all issues, or the expiration of the four-year period, whichever occurs later.

24 CFR 576.400(f)

General Policies – Faith Based Organizations

As part of the onsite monitoring procedures, the monitor will verify that faith-based subrecipients have adopted and are following a policy that complies with the regulations at 24 CFR 5.109.

General Policies – Termination of Services

Subrecipients must provide a formal termination process that recognizes the rights of individuals receiving assistance. The subrecipient may terminate assistance to a program participant who violates program requirements. The subrecipient may resume assistance to a program participant whose assistance was previously terminated. In terminating assistance to a program participant, the subrecipient must provide a formal process that recognizes the rights of individuals receiving assistance to due process of law. This process, at a minimum, must consist of:

- Written notice to the program participant containing a clear statement of the reasons for termination;
- A review of the decision, in which the program participant is given the opportunity to present written objections;
- Prompt written notice of the final decision to the program participant.

General Policies - Rent Reasonableness

Rent reasonableness is determined on a case-by-case basis. Rent reasonableness should be determined by considering the following:

reasonableness in relation to rents being charged for comparable unassisted units, taking into account the location, size, type, quality, amenities, and maintenance of each unit.

rent should not be more than the rents currently being charged by the same owner for comparable unassisted units.

All ESG rental assistance provided must be reasonable. Comparable rents can be found by reviewing equivalent units advertised for rent; written verification from the landlord of rents charged for comparable units owned; or the use of a market study.

At least three comparable units verifying the reasonableness of the ESG assisted unit are required in the file of clients receiving ESG rental assistance. Each comparable must have been advertised for rent within the last six months, at most, preferably within the last 3 months. This is required for all households receiving homelessness prevention or rapid re-housing assistance.

Transfer of Funds

Transfers are the movement of funds from one program or project to another program or project to increase funds in one and decrease funds in another. There are two types of transfers: Inter-program and due to / due from. Unlike inter-program transfers, transfers due to / due from transfers are expected to be repaid.

Inter-program transfers of funds are only allowed if applicable HUD regulations and other federal and state laws allow such a transfer of funds. Inter-program transfers are typically permitted in the following situations:

- Transfers of funds from a public service project to another public service project if all funds cannot be used by subrecipient.

- Transfers of funds from the Capital Fund Program to another capital project if all funds cannot be used.
- Transfer of administrative fees after the close of the fiscal year to support capital improvement projects.
- Transfer of administrative fee reserves, if used for other capital project.

Due to /due from transfers represent the transfer of funds from one project or program to another that is expected to be re-paid. Due to / due from transfers between DPD and a subrecipient would normally be permitted. However, due to / due from transfers between federal, state, and local programs are generally prohibited.

In practice, the use of due to /due from transfers between projects and programs is usually the result of DPD using one central account which pays for the indirect costs of the programs or serves as a working capital account for DPD. Best practice is for DPD to re-pay the funds within 30 days.

Inter-program and due to / due from transfer balances should be reviewed monthly to ensure that the transfers are allowed and that re-payments of due to / due from transfers are made timely (i.e., within 30 days). All Inter-program and due to / due from transfer balances must be resolved prior to the end of the County's fiscal year. If re-payments of due to / due from are not made timely, the amounts may be considered an ineligible cost.

Financial Guidelines: General Purpose

The purpose of DPD's Financial Management and Internal Controls Policy is to establish guidelines for control of the administration and implementation of the HUD funds in accordance with the County's goals and objectives;

to properly safeguard the County's assets
make sound financial decisions, and
provide accurate financial reports.

The County is a non-federal entity administering federal programs and is therefore required to account for and present their basic financial statements according to Generally Accepted Accounting Principles (GAAP) standards set by the Governmental Accounting Standards Board (GASB). This Policy governs the financial management system of DPD's management of HUD funds and complies with the provisions of Title 2, Part 200 of the Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards ("Uniform Grant Guidance").

2. FINANCIAL RESPONSIBILITIES This policy and any later changes shall be submitted to the County Board of Commissioners ("Board") for approval. The Board is responsible for ensuring that any policy to be adopted is appropriate for the County. The Board appoints and delegates financial and budget authority to the Budget Bureau Chief and the Finance Manager (Janet Hamilton). The Finance Manager oversees the day-to-day financial management activities of HUD funds, ensuring the accuracy of the accounting records, internal controls are in place and adhered to, financial reports are prepared and communicated to the Board timely. The Finance Manager is responsible

for the preparation and maintenance of the accounting software's chart of accounts, maintenance of the general ledger, reconciliation of subsidiary system accounts such as cash management, accounts payable, accounts receivable, job costing, payroll, journal entries, and responsibility of preparing required reports for compliance with the Internal Revenue Service (IRS), State and Federal grant reporting requirements.

3. ACCOUNTING METHODS & STANDARDS. Accounting methods employed by DPD shall, at a minimum, satisfy such requirements as may be prescribed by federal or state laws, regulations or guidelines. Additional accounting methods shall be employed to satisfy applicable government accounting standards promulgated by such competent authoritative (Review sources as the Governmental Accounting Standards Board (GASB)) and Financial Accounting Standards Board (FASB), where applicable.

4. REVENUE RECOGNITION. Revenue shall be recognized in the accounting period in which it is earned and measurable. DPD's major revenue categories are:

- **Governmental Grants: Federal, State, and Local:** These revenue types are recognized in accordance with the legal and contractual requirements of the specific programs. Grant revenues are recognized based on expenditures recorded.
- **Unrestricted Donations and Contributions:** Revenues are recognized when received.
- **Rental Income:** Revenues are recognized when earned, based on monthly billings to residents.
- **Other Income:** Revenues are recognized as earned.
- **Interest and Dividend Income:** Revenues from interest and dividend income from cash and investments, and interest from mortgage loans issued to borrowers are recognized when earned.
- **Gain/Loss on sale of assets:** A gain or loss is recognized when an asset is sold or disposed of.

5. EXPENSE RECOGNITION. Expenses are generally recognized in the accounting period in which they are incurred, when measurable. Exceptions to this general rule include: • **Prepaid Expenses:** Expenses are recognized as they are used or consumed. • **Capital Assets:** Assets are recorded at historical costs and expensed through depreciation over the useful life of the assets.

6. ACCOUNT RECORDS, IDENTIFICATION, AND SOURCE DOCUMENTS. In the administration of federal, state and local government awards, DPD's financial management system must be set up so that it can provide for the following:

- DPD will maintain adequate accounting records that are supported by source documents which are the basis for the accounting transactions. Examples include checks, invoices, copies of checks and receipts, timesheets, etc.
- DPD will maintain records which adequately identify the source and application of funds provided. For example:
 - a. **Federal Awards:** All Federal awards received and expended by the DPD must be properly identified and accounted for and must include, as applicable including title and number, grant identification number and year, name of the federal agency, and the name of the pass-through entity, if any.
 - b. **State and Local Awards:** All State and Local awards received and expended by DPD

must be properly identified and accounted for and must include, as applicable, the title and name of the grant award, the award number and the year, and the name of the pass-through entity, if any.

- DPD must maintain source documents that adequately support the grant award, authorizations, obligations, unobligated balances, assets, expenditures, income and interest.

7. RECORDS AND INFORMATION MANAGEMENT. DPD shall apply uniform rules for our records (including financial) and information which meet legal standards and best practices for effective records and information management for existing records and yet to be created records, and shall apply to all employees and contractors who generate information for DPD.

- DPD shall ensure:
 - Control of all the Consortium’s information, regardless of media form;
 - Records are retained in accordance with legal, business and federal, state, and local government program requirements;
 - Records are maintained and stored in a manner that is secure and accessible through the retention period;
 - Appropriate safeguards are in place against illegal access, removal, loss, or destruction of DPD’s records and information;
 - Disposal of records and information is performed in accordance with an approved accordance with 1000.552,
 - Records must be retained for 3 years from the end of the HUD program year during which the expenditures occurred.
 - If any litigation, claim, negotiation, audit, or other action involving the records has been started before the expiration of the 3-year period, the records must be retained until completion of the action and resolution of all issues which arise from it, or until the end of the regular 3-year period, whichever is later.

8. FINANCIAL REPORTS. DPD will produce accurate, current, and complete disclosure of the financial results of each of the financially assisted activities made in accordance with the financial reporting requirements of the grant or subgrant.

DPD shall use the financial reports as tools to manage, control, ensure compliance, monitor, and inform the County and HUD on its financial activities.

- a. Reports to Grant Agencies: DPD shall complete and submit all reports to Federal, State, and local grant agencies in accordance with, and in the format and timelines required by the agency. The Finance Director shall oversee all administrative and financial reports, including the HUD Standard Form 425 (Quarterly Transaction Report), the IHP and the APR, before the due dates designated by HUD, as such forms and deadlines may change from time to time.
- b. Management and Board reports: DPD shall prepare and make available to management and HUD on a quarterly basis, financial reports to include:
 - Statement of Net Position.
 - Statement of Revenues, Expenses, and Changes in Net Position.
 - Statement of Cash Flow.
 - Budget to actual reports detailing significant variances of sources and uses of

funds as a management tool.

9. CASH MANAGEMENT POLICY. No cash used.

10. BUDGET ADMINISTRATION

Budget Responsibility and Adoption: DPD's annual budget represents a financial plan for management to carry out the objectives of the County's Policy Road Map. TRIBE/TDHE's affordable housing activities. The Finance Manager (Janet) and her/his team are responsible for preparing the annual budget and are responsible for presenting the annual budget to the Board for final approval. Total projected sources and uses of funds are identified and included in the annual budget, allowing for inclusion of all funding sources and all funding outlays during the budget period. In addition to grant revenue, other sources of funds, such as debts (for example, Title VI loans) are included in the annual budget to accurately portray total resources used to fund operating and capital plans in the fiscal year, and expenditure budgets for grant awards are in compliance with the grant agreement. The Board approves the annual Plan, and those approved activities are included in the Action Plan.

- a. Budget Preparation Timing: The budget process should begin early in the fiscal year to allow the Finance Director (Janet) and the department managers to engage in the process and present the budget to the Board for approval. Once the budget has been approved, the Finance Director shall input the approved budget in the accounting system for the new fiscal year.

- c. Budget Management and Report: Program managers shall be responsible for managing transactions that are charged against their department budgets and are accountable for ensuring their department revenues and expenses posted against their department budget are accurate and are responsible for providing justifications on budget variables. The budget for specific grant awards provides a spending plan against which fiscal and program performance can be measured. Therefore, DPD's accounting system must be set up in a manner that allows DPD to produce financial reports that compare expenditures with budget amounts in compliance with the Federal award agreement.

10. PURCHASE OF GOODS AND SERVICES. DPD's purchases shall be governed by its Board approved procurement policy, which establishes guidelines to ensure reasonable buying practices and competition, quality and integrity.

11. ALLOWABLE COSTS. As the recipient of federal awards, the DPD bases its allowable cost principles on Subpart E of the Uniform Grant Guidance and shall expend ESG funds only for activities that are expressly approved by HUD.

No money shall be expended for activities that are unallowable or that are included as a cost of any other federally funded program in either the current or a prior year.

The total cost of a federal award is the sum of the allowable direct and allocable indirect costs, less any applicable credits.

Criteria to costs:

- Be necessary, reasonable, and allocable;

- Conform to any limitations or exclusions;
- Be consistent with policies and procedures;
- Apply treatment of cost consistently; • Generally be treated in accordance with generally accepted accounting principles (GAAP).

DPD must adequately document costs to include, compliance with statutory and national policy requirements and be able to prepare reports that measure performance DPD shall have written procedures for determining the allowability of costs that comply with the terms and conditions of the federal award as outlined in this section.

12. CAPITAL ASSETS. Capital assets means tangible or intangible assets used in operations having a useful life of more than one year which are capitalized in accordance with GAAP. Capital assets include: • Land, buildings (facilities), equipment, and intellectual property (including software) whether acquired by purchase, construction, manufacture, leasepurchase, exchange, or through capital leases; and

- Additions, improvements, modifications, replacements, rearrangements, reinstallations, renovations, or alterations to capital assets that materially increase their value or useful life (not ordinary repairs and maintenance).

13. CAPITALIZATION PROCEDURES

I. Physical assets, such as equipment, are an integral part of the operation of DPD and shall be safeguarded in much the same manner as cash assets. II. All Department equipment shall be stored in a secure place.

II. The Finance Department of DPD shall maintain a property ledger in the book of accounts of the Department, which shall include a list of all capitalized items for inventory control purposes.

III. Detailed records of individual capital assets shall be kept and periodically (at least annually) balanced with the general ledger accounts. V. All property and equipment owned by DPD (other than real estate) shall be divided into two categories: Expendable items or nonexpendable items, defined as follows:

- i. Expendable items are purchased or donated items having a useful life of less than twelve (12) months and costing less than \$5,000.00 and can be expended.
- ii. Non-expendable items are purchased or donated items having a useful **life of more than twelve (12) months and costing more than \$5,000.00.**
- iii. The Finance Director of DPD or his/her designee for budgeting and financial control purposes shall capitalize non-expendable items.
- iv. VII. The DPD shall make a physical inventory of all equipment and property (other than real estate) at least annually, which shall be reconciled to the general ledger accounts.

14. AUDIT- DPD shall have a financial audit completed annually by a certified, external, independent accounting firm, unless DPD by constitution or statute, undergo audits biennially. The Finance Director (Janet) shall have direct responsibility in overseeing the

implementation of the audit. The selection of an auditor shall be competitively procured by the County using the Request for Proposal (RFP) method with the objective of obtaining a high quality audit, with MBE/WBE participation and the selected audit firm must provide a peer review report as part of the selection process. The Finance Director (Janet) and the Finance Director shall make available the completed audit report to the Board. The auditors shall present the audit to the Board for the Board to approve and accept. The audit shall meet the Generally Accepted Government Auditing Standards (GAGAS) and comply with the audit requirements under Title 2 Part 200 of the Uniform Grant Guidance. DPD shall submit the audit to HUD with the Annual Action Plan. DPD shall develop a plan to correct all deficiencies (if any) noted in the audit and shall implement sufficient and appropriate corrective actions in order to preclude repeat findings in subsequent audits. DPD shall be required to describe in the audit document, reasons for the reoccurrence of the finding, planned corrective action, and any partial corrective action taken.

Annual Audit:

At fiscal year-end, November 30, Cook County contracts with an independent Public Accounting Firm licensed in the state of Illinois, to audit year-end financial statements and to prepare an OMB A-133 audit of federal awards as required for entities receiving over \$750,000 in federal funds (*see auditor procurement section below*). The completed audit is reviewed by the board finance committee, which then makes a recommendation to the board whether to accept. The full board of directors then votes to accept the audit. The completed financial statement and OMB A-133 audit is submitted to the Federal Audit Clearinghouse Bureau of the Census and to federal funding agencies by the due date, including extensions. Information from current and prior A-133 audits is accessible online through the Federal Audit Clearinghouse website at: <http://harvester.census.gov/sac/>.

Auditor Procurement

In procuring audit services, Cook County follows the standards prescribed by the Procurement Standards of 2 CFR Part 200. Recommendations are solicited from non-profit organizations of similar size and/or mission, as well as board members. The RFP is then sent to the recommended firms. In requesting proposals for audit services, the objectives and scope of the audit are made clear. Cook County also requests a copy of the audit organization's peer review report. Factors considered in evaluating each proposal for audit services include the responsiveness to the request for proposal, relevant experience, availability of staff with professional qualifications and technical abilities, the results of peer and external quality control reviews, and price. Additionally, Cook County makes positive efforts to utilize small businesses, minority-owned firms, and women's business enterprises, in procuring audit services as stated in [§ 200.321](#), or the FAR ([48 CFR part 42](#)), as applicable.

- **EFFECTIVE INTERNAL CONTROLS AND ACCOUNTABILITY.** Notwithstanding the policies described earlier in this document, DPD has established a number of internal control procedures to ensure awards are managed to comply with statutes, regulations, and the terms and conditions of the award;
- DPD evaluates and monitors the grant awards to ensure compliance with statutes, regulations, and the terms and conditions of the award;
- DPD shall take prompt action to correct identified instances of noncompliance including noncompliance identified in audit findings;

- DPD must take reasonable measures to safeguard sensitive information and assets purchased with grant awards, consistent with privacy obligations of confidentiality of applicable federal, State and local laws.
- DPD must ensure there are sufficient funds to cover payments made for program and operations activities;
- Establish written procedures to ensure the amount and the timing of grant award advances drawn for the purpose of paying program expenses have not been drawn unreasonably in advance of when the funds are needed for program expenses.
- Establish adequate internal controls and written procedures to ensure payments are made only for approved purposes.

Accordingly, no single person shall have the authority to authorize a transaction, execute a transaction, record a transaction, and have custody of any resulting assets.

Division of Responsibilities

The following is a list of personnel who have responsibilities within the accounting department:

Administrative Assistant III:

1. Create tracking form
2. Enter invoice into Oracle (Accounting system)

Administrative Analyst IV:

1. Review invoices and backup documentations
2. Invoice approval

Grant Analyst:

1. Create 29A (internal voucher)
2. Check Oracle/IDIS for funding
3. GL Expense account; including program, project, and award grant number
4. Create voucher in IDIS system
5. Process draws from IDIS
6. Budget set up and modifications in Oracle

Grant Finance Manager:

1. Review and approve invoices in Oracle
2. Review and approve draws in IDIS

Administrative Assistant III:

1. Budget set up and modifications in IDIS
2. Projects closeout
3. Entering Sub-recipients' accomplishment date
4. Monitoring flags
5. Reporting

Deputy Director of Community Development:

1. Review and approve invoices

Director Planning and Development

1. Review and approved invoices \$25,000 plus

Bureau Chief:

1. Review and approve invoices \$1M plus

Subrecipients must adopt and follow written procurement standards that meet the minimum requirements of 2 CFR 317 through 200.326 that allows for full and open competition.

The subrecipient must maintain records regarding any procurement that will be funded by ESG. Regardless of the method of procurement used, subrecipients must develop and retain documentation to demonstrate their reasons for choosing the method of procurement, the basis for selection or rejection of consultants, consultant qualifications, contract specifications, and scope of work. This documentation should include copies of the RFP, legal advertisements, affidavits from newspapers verifying publication, and other related selection materials. ESG procurement files must also document the basis for the contract or purchase price.

Financial information in support of any contract payments must also be maintained. This documentation includes vouchers, invoices, contracts, checks, budget transfer memoranda, and other transaction documentation. The Sub recipient must also be able to document that vouchers and invoices were reviewed to verify financial and contractual compliance before payment was made.

Procurement Files should include:

- Documentation of price quotes received for items or services procured with small purchase method, with copy of scope of work
- Request for Proposals (RFPs) and/or Invitations for Bids (IFBs)
- Public notices of RFPs or IFBs
- Mailing list of RFP or IFB recipients
- Qualification statements, proposals and/or bids received
- RFP ratings and documentation of selection process
- Documentation of selection for IFB if lowest bidder not selected
- Sole source justification and approval letters, if applicable
- Cost estimates/data used to determine cost reasonableness, with copy of scope of work
- Draft specifications detailing the specific work to be completed
- Maintain a record of independent estimates of the rehab costs
- Evidence the lowest bidder was selected
- Verification of contractor eligibility
- Signed contracts and all approved amendments

Financial Management – System

The Subrecipient must maintain a financial management system that meets the minimum requirements found at 2 CFR Part 200. The financial management system must be able to identify all federal awards received and expended and the federal programs under which they were received, including:

- The CFDA title and number,

- Federal award identification number and year,
- Name of the Federal agency, and
- name of the pass-through entity, if any.

The Subrecipient must adopt and follow written financial management policies and procedures that, at a minimum, provide for:

- determination the allowability of costs in accordance with the terms and conditions of this Agreement and the federal cost principles published in the U.S. federal regulations at 2 CFR 200 Subpart E.
- effective control over, and accountability for, all funds, property, and other assets to ensure all assets are safeguarded and they are used solely for authorized purposes (see Internal Control below); and
- accurate financial reporting on federal awards, authorizations, obligations, unobligated balances, assets, expenditures, income and interest and be supported by source documentation.

A subrecipient's financial system must be set up to satisfy an auditor conducting a single unit or independent audit, whichever applies. During the monitoring visit, examine records to ascertain if:

- Funds are properly budgeted and approved;
- Budget revisions have been documented and approved;
- Personnel charges are properly allocated to the block grant and based on payroll documents such as time and attendance records;
- All expenditures can be traced to source documents (i.e., purchase orders, invoices, canceled checks);
- Drawdowns have been timely;
- Only allowable funds have been claimed on the project;
- The subrecipient accounting system reflects all assets, liabilities, etc.;
- Property has been managed and inventoried properly;
- In-kind costs and costs billed to other funds are clearly documented; and,
- There are billings for indirect costs and an indirect cost allocation plan has been approved by the {agency or individual}

Records to be Maintained

- chart of accounts,
- manual on accounting procedures,
- accounting journals and ledgers,
- Source documentation (purchase orders, invoices, canceled checks, etc.),
- Procurement files, bank account records, financial reports, audit files, etc.
- Financial records, accounts and other records – per subrecipient agreement
- General ledger supporting costs charged to CDBG program
- Records documenting procurement of goods and services
- Contracts for goods and services,
- lease and rental agreements
- Invoices
- Billing statements

- Cancelled checks
- Timecards signed by employees and supervisors
- Personnel authorization of records
- Payroll registers
- Payroll tax records
- Bank statements
- Bank reconciliation reports
- Subcontractor agreements

Financial Management – Internal Control

The Subrecipient must demonstrate effective internal control over ESG funds to provide reasonable assurance that the Program is administered in compliance with applicable federal statutes, regulations, and the terms and conditions of the ESG agreement. This includes evaluation and internal monitoring and prompt, appropriate action when instances of noncompliance are identified. Internal control activities should include but are not limited to:

- A well established organizational chart and corresponding job descriptions that provide for segregation of duties and managerial oversight.
- Pre-number all checks and adequately safeguard all blank checks.
- Assign the responsibility for cash receipts and disbursement duties to a person other than the person who performs bank reconciliations.
- Record all cash receipts and other financial transactions in a timely manner.
- Verify mathematical accuracy of all accounts payable invoices, formally approve these invoices for payment, and cancel them when paid.
- Perform bank reconciliations, locate and explain all differences, and designate responsible local official (other than the person performing the reconciliation) to review bank reconciliations.
- All transfers, amendments, and revisions to approved budget authorities must receive prior approval from the County.

Closeout

Projects cannot be closed out until a final invoice is submitted by the subrecipient and all monitoring activities have been completed. The subrecipient also needs to submit a final annual Performance Report to receive their final drawdown. Planners shall ensure that all documentation has been collected prior to forwarding final invoice to Finance Division for processing.

Final Case File Review

The file checklists shall be used to facilitate collection of and verify all required documents are in the subrecipients' files. Before submitting any request to close out a project, the Planner should check each file to ensure it is complete and has all information as indicated and required by the checklist.

Collection of Beneficiary Data

Each subrecipient is required to submit end of the year performance reports, summarizing the accomplishments achieved and any beneficiary data collected for the project.

Post Closeout - Minimum Use Periods

In projects where a building is renovated with ESG funds as a shelter, the ESG Planner will notify the ESG Program Manager upon grant closeout. The ESG Program manager will work with legal counsel to draft, execute, and record the minimum use requirements via a recorded deed or use restriction.

The ESG Program Manager will retain a schedule of all properties subject to the Minimum Use Period, including the name of the subrecipient, the address of the shelter, the start and end of the minimum use period, and the recording number of the deed.