



Annual Action Plan 2022

Village of Oak Park

Development
Customer Services



Village of Oak Park, IL
Draft PY 2022 Action Plan

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1. Executive Summary

Purpose of the Annual Action Plan

The Village of Oak Park is classified as an entitlement community with a population over 50,000 and receives an annual allocation of Community Development Block Grant (CDBG) funding from the Department of Housing and Urban Development (HUD). This allocation is based on a complex formula that includes such factors as population, poverty, and age of housing stock. There are three essential documents required by HUD from all recipients of the CDBG Program: The Consolidated Plan, the Annual Action Plan, and the Consolidated Annual Performance and Evaluation Report (CAPER). The Consolidated Plan must be submitted every five years and provides an overview of the community, establishes long-term objectives, strategies, and goals to mitigate the items identified. The Annual Action Plan allows the community to make annual adjustments to meet both the goals established in the Consolidated Plan or to adapt to newer issues that may arise. At the end of the program year, the CAPER provides the results of the CDBG programs by reporting performance. The Annual Action Plan and CAPER are required to be submitted to HUD annually.

The Village of Oak Park's Program Year (PY) 2020-2024 Consolidated Plan, has prepared the Year Three Draft Action Plan as required under 24 CFR 91.220. The Draft Action Plan for PY 2022 identifies the activities to be funded with the Village's Community Development Block Grant (CDBG) program funds during the program year, which runs from October 1, 2022 to September 30, 2023. Similar to PY 2021, for PY 2022, the Village will not receive Emergency Solutions Grant (ESG) program funds.

Lead Agency

The lead agency for the Action Plan is the Administrative Division of Development Customer Services Department of the Village of Oak Park, a general-purpose unit of municipal government. The Division initiated the administration, organization and preparation of the draft Action Plan and will coordinate the public and nonprofit entities that will carry out the identified goals. The entire list of recommendations per agencies is included in the table on page 8.

Basis for Allocating CDBG Investments

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

The system for establishing the priority for the selection of these projects is predicated upon the following criteria:

- Meeting the statutory requirements of the CDBG Program;
- Being consistent with the Village's PY 2020-2024 Consolidated Plan;

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- Meeting the needs of LMI Oak Park residents;
- Focusing on LMI areas or neighborhoods in the Village (if applicable);
- Coordination and leveraging of resources;
- Response to expressed needs;
- Sustainability and/or long-term impact;
- Ability to demonstrate measurable progress and success; and
- When possible, continue to assist with COVID-19 effects.

Obstacles to Meeting Underserved Needs

The primary obstacle to meeting underserved needs is the limited resources available to address identified priorities. The Village of Oak Park will partner with other public agencies and non-profit organizations to leverage resources and maximize outcomes in housing and community development. As a result of the COVID-19 pandemic, an added weight has impacted the Village of Oak Park's residents. The Village of Oak Park has developed strategies to provide resources and assistance to those affected. These strategies will continue with CDBG-Coronavirus (CDBG-CV) funds during the program year. CDBG-CV funds have helped to alleviate the strain on the small business and non-profit communities.

Funds Expected to be Available

The Village of Oak Park CDBG allocation for PY 2022 is **\$1,553,643** a 6% decrease from the \$1,653,543 in Program Year 2021. The Village will add \$500,000 in prior year returned funds (funds that were previously returned by grant subrecipients) for a PY 2022 CDBG amount of \$2,053,642. The Single-Family Housing Rehabilitation program revolving loan fund balance of \$175,000 added to this amount, there is a total PY 2022 CDBG amount of \$2,228,642.

The total amount of CDBG funds obligated for administration activities must not exceed 20 percent of the annual grant allocation. Proposed planning/administration allocation include \$75,000 for the Oak Park Regional Housing Center, \$16,000 for Housing Forward/Oak Park Homelessness Coalition and \$219,728 for the Village of Oak Park.

The total amount of CDBG funds obligated for public services activities must not exceed 15 percent of the annual grant allocation. The proposed PY 2022 funding amount for non-profit CDBG subrecipients is as follows: \$233,000 which includes \$15,844 allocated for the Oak Park Public Health Department, Farmer's Market through Public Services and \$99,071 for Public Facilities and Improvements.

The remainder of the expected CDBG funding is proposed to be allocated as follows: \$526,000 for Housing including \$75,000 for Code Enforcement and \$1,059,843 for Infrastructure.

As noted above, the Single-Family Housing Rehabilitation program will also begin the 2022 program year with \$175,000 in repaid CDBG loans for its revolving loan fund. Returned funds in the amount of \$114,000 will be utilized for Single Family Housing Rehabilitation homeowner rehabilitation loans. These funds are part of a contingency plan for housing at a time when loans are not scheduled to be paid back.

For PY 2022, the Village will not receive Emergency Solutions Grant (ESG) program funds. In PY2021 the Village of Oak Park decided to de-obligate from the uncommitted Section 108 loan.

Coordination/Cooperation Between Agencies

The Administrative Department of the Development Customer Services Department of the Village of Oak Park, is responsible for administering and managing the Action Plan process. In administering its programs, the Village works cooperatively within a local government landscape that includes all of the local taxing bodies. Many of these entities assist persons with housing, health, and social services.

In contracting with public and non-profit agencies to provide the community programs and services outlined in the draft Action Plan, the Village uses its annual budget process to coordinate and allocate funding. The Village's governing body, the Village Board, receives public input via the Community Development Citizens Advisory Committee (CDCAC) regarding the allocation of some CDBG funds. Staff and elected officials consider community needs and public opinion to determine project prioritization. The Consolidated Plan is the guiding document.

Coordination among agencies, in the development and implementation of housing and community development programs and services, is critical in efforts to leverage limited resources. The Village is committed to the close coordination of all of its programs with other agencies at a variety of levels.

Citizen Participation

During the Draft PY 2022 Action Plan process, the Village encouraged a high level of agency consultation in an effort to demonstrate its commitment to the following: 1.) Identifying priority needs; and 2.) Engaging the participation of citizens, public agencies and non-profit organizations in a positive and collaborative manner.

The development of the Village of Oak Park PY 2022 Action Plan began on January 20, 2022 when a Notice of Federal Funding Availability was published in the *Wednesday Journal* newspaper. Additionally, all organizational representatives on the Development Customer Services Department grants mailing list were sent a notice and social media was used to reach additional non-profits through the Village of Oak Park's website, Facebook and LinkedIn pages. To maximize all efforts, two ads were placed in the *Wednesday Journal* advertising the mandatory Grants Workshop, on two separate weeks, encouraging new non-profits to participate and learn about the CDBG funding opportunities. Over 60 participants attended the workshops which included six (6) new organizations whom had not previously received CDBG funds prior to this program year.

The Community Development Citizens Advisory Committee (CDCAC) held four public meetings, including a public comment hearing, and conducted an in-depth review of each application. This process began on March 2, 2022, when a Notice of these meetings was published in the *Wednesday Journal* newspaper. Two public CDCAC meetings were held in April 2022 and two public hearings held in May 2022.

The Village of Oak Park CDCAC reviewed all proposals that were submitted and heard applicant presentations. Afterwards the Commissioners collectively worked to determine funding recommendations and presented the recommendations to the Village President and Board of Trustees for a portion of the Village's PY 2022 CDBG entitlement allocation. All of these recommendations are now included in this Draft Action Plan.

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On June 21, 2022, the Village Board voted on releasing the draft PY 2022 Action Plan for a 30-day public comment period to begin June 22, 2022. The Notice of Document Availability for the draft PY 2022 Action Plan will be published in the *Wednesday Journal* on June 22, 2022 and advertised on the Village website, with the 30-day comment period running from June 22, 2022 to 5 p.m. on July 22, 2022. A virtual Public Hearing will be held from 3 p.m. to 4 p.m. on July 11, 2022. After being released, the draft PY 2022 Action Plan will be available at the following locations:

- Village of Oak Park Development Customer Services, 123 Madison Street, Oak Park; and
- The Village's Website, on the Housing-Grants page.

2. Expected Resources

The Village of Oak Park CDBG allocation for PY 2022 is **\$1,553,643**. The Village will be adding \$500,000 in prior year, returned funds for a PY 2022 CDBG amount of \$2,053,642. With the Single-Family Housing Rehabilitation program revolving loan fund balance of \$175,000 added to this amount, there is a total PY 2022 CDBG amount of \$2,228,642.

Federal funding will leverage private, state and local funds by enabling the Village of Oak Park to serve those with the greatest need at the highest capacity.

Every CDBG subrecipient will be contributing private, local, state, and/or other federal funds to their respective activity. Additionally, federal funds will serve as funding for Village programs or service provider applications that require additional funding in order to have their program, project, or service meet a need in the community. The grant money provided by HUD will allow organizations and the Village to successfully meet the needs of the community's most vulnerable members. In PY2021 the Village decided to de-obligate from the uncommitted Section 108 funds. For PY 2022, the Village will not receive Emergency Solutions Grant (ESG) program funds.

3. Annual Goals and Objectives

PY 2022 Priorities and Strategies

During the 2022 Action Plan program year (October 1, 2022 - September 30, 2023), the Village will focus on the following objectives, as identified in the Consolidated Plan: 1.) Working to address the communities priority needs and outcomes of affordable and decent housing; 2.) Working to address the accessibility and availability of a suitable living environment; and 3.) Expanding economic opportunities for low- and moderate-income persons.

After the Consolidated Plan citizen participation process and input from Village stakeholders, the highest priorities were found to be Public Services, Affordable Housing, Homelessness, Public Facility Improvement, Economic Development, Planning and Infrastructure for CDBG funding.

CDBG Public Services subcategory priorities included behavioral health services, fair housing, and emergency food provision and nutrition services.

Homelessness subcategory priorities included homelessness prevention, emergency shelter, interim housing, employment readiness and street outreach.

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Housing subcategory priorities included the Small Rental Rehabilitation Program, the Single-Family Rehabilitation Loan Program, and code enforcement. The Small Rental Rehabilitation Program increases affordability for renters in multi-family buildings having 7 or fewer units, and the Single Family Rehabilitation Loan Program provides zero percent loans deferred for 20 years for low and moderate income homeowners. Code enforcement enhances the health and safety of Oak Park's population by inspecting the local housing stock and ensuring that it is in good shape.

Infrastructure Improvements subcategory priorities included alley improvements, water mains and lines improvements, street improvements, sidewalk and sidewalk ramp improvements, including ADA compliant sidewalks, and community public restroom. Access to a public restroom allows access to a safe, clean restroom for all which is vital to public safety.

Other high priorities were Economic Development, Administration and Planning, and Public Facility Improvements for CDBG funding.

As a result, to the COVID-19 pandemic, the Village of Oak Park has continued to provide resources and assistance to persons and businesses affected. The primary method to achieve this goal is the Village's CDBG-CV grant that is ongoing. The CDBG-CV grants have supported the development of the Business Assistance Loan program. This program was created to help Oak Park businesses create and/or retain jobs for workers with incomes at or below 80% of the AMI for Cook County. 84 grant applications were approved for a total of \$492,485 loaned to Oak Park businesses. CDBG-CV funds also provided \$219,622 to nine (9) Public Service, non-profit, organizations.

Over program years 2020 to 2024, the Village has a strategy to prioritize proposed projects each year that meet these high priorities.

Consolidated Plan/Action Plan Goal Descriptions

1	Goal Name	Public Services
	Goal Description	Expanding the availability of and increasing access to needed services is a key goal. Services include, but are not limited to, behavioral health services, fair housing, and emergency food provision and nutrition services. The Village continued to prevention and respond to COVID-19, to facilitate assistance to eligible persons economically impacted by COVID-19.
2	Goal Name	Public Infrastructure
	Goal Description	Creating livable communities through improvements to public infrastructure. Maintaining and improving the quality of Oak Park's existing infrastructure is instrumental to ensuring that residents live in a safe, clean, and sustainable environment.
3	Goal Name	Homelessness
	Goal Description	Oak Park aims to support services to prevent homelessness and to assist those currently experiencing homelessness. These services include, but are not limited to, homelessness prevention, emergency shelter, interim housing, employment readiness and street outreach. Facilitate assistance to persons impacted by COVID-19.
4	Goal Name	Affordable Housing
	Goal Description	The Village of Oak Park aims to maintain, and improve affordable housing, both renter-occupied and owner-occupied. The highest priorities were the Small Rental Rehab Program, the Single-Family Rehab Loan Program, and code enforcement. The Small Rental Rehabilitation Program increases affordability for renters in multi-family buildings having 7 or fewer units, and the Single-Family Rehabilitation Loan Program provides zero percent loans deferred for 20 years for low- and moderate-income homeowners. Code enforcement enhances the health and safety of Oak Park's population by inspecting the local housing stock. Facilitate assistance to persons impacted by COVID-19.
5	Goal Name	Public Facilities
	Goal Description	Maintaining and improving the quality of Oak Park's existing public facilities is instrumental to ensuring that residents have access to safe and accessible facilities.
6	Goal Name	Economic Development
	Goal Description	Economic development will promote the vitality of Oak Park's economy in depressed areas of the community. Fostering growth in these areas will, in turn, provide greater opportunities for the Village's low and moderate-income residents.
7	Goal Name	Administration and Planning
	Goal Description	Administration of the CDBG and ESG Programs by Village staff, homelessness assistance administration and planning, and fair housing administration.

4. Proposed CDBG Activities for PY 2022 - Funding

PY 2022 CDBG Agency	Proposed Activity	Grant Amount
ADMINISTRATION	(Capped at 20% of total award)	
Village of Oak Park (VOP)	VOP CDBG Administration	\$ 219,728.60
Oak Park Regional Housing Center	Fair Housing Administration	\$ 75,000.00
Housing Forward/OP Homeless Coalition	Homelessness Assistance Planning & Admin	\$ 16,000.00
Total Admin		\$ 310,728.60
PUBLIC SERVICES	(Capped at 15% of total award)	
Beyond Hunger	Direct Hunger Relief	\$ 22,000.00
Community Support Services	Respite and Case Management	\$ 8,111.00
Hephzibah Children's Association	Svcs & Support for Abused/Neglected Children	\$ 19,000.00
Housing Forward	Interim Housing Shelter	\$ 32,000.00
Housing Forward	Employment Readiness	\$ 10,000.00
IWS Children's Clinic	Dental Care for Youth	\$ 21,000.00
NAMI-Metro Suburban	Drop In Center	\$ 10,000.00
New Moms, Inc.	Family Support	\$ 17,000.00
North West Housing Partnership	Handyman Services for Seniors	\$ 6,125.00
Oak Park Regional Housing Center	Fair Housing Outreach	\$ 15,000.00
Our Future Reads	Literacy Program	\$ 3,920.00
Sarah's Inn	Domestic Violence Services	\$ 12,000.00
Thrive Counseling Center	Psychiatric Services for Medicaid Clients	\$ 17,000.00
Way Back Inn	Substance Use Disorder Recovery Counseling	\$ 6,000.00
Y.E.M.B.A.	Youth Mentoring	\$ 17,000.00
VOP Public Health	Healthy Nutrition Incentives at Farmers Market	\$ 15,844.00
Total Public Services		\$ 233,000.00
PUBLIC FACILITIES & IMPROVEMENTS		
UCP-Seguin Services	Public Facility Improvement	\$ 46,800.00
Way Back Inn	Public Facility Improvement	\$ 42,271.00
Y.E.M.B.A.	Public Facility Improvement	\$ 10,000.00
Total Facility Improvements		\$ 99,071.00
HOUSING		
VOP Housing Program	Lead Hazard Reduction	\$ 99,150.00
VOP Housing Program	Small Rental Rehab Program	\$ 90,950.00
VOP Housing Program	Single Rental Rehab Program	\$ 85,900.00
VOP Property Maintenance Program	Code Enforcement	\$ 75,000.00
VOP Housing Program	Single Family Housing Rehab Loan Program	\$ 175,000.00
Total Housing		\$ 526,000.00
INFRASTRUCTURE		
VOP Public Works	ADA Sidewalks & Ramps	\$ 225,000.00
VOP Public Works	Streets & Sidewalk Ramps	\$ 384,843.00
VOP Public Works	Alleys	\$ 400,000.00
VOP Public Works	Water Lines	\$ 50,000.00
Total Infrastructure		\$ 1,059,843.00
GRAND TOTAL		\$2,053,642.60

The proposed activities identified in the previous chart have been identified by the Village to be implemented in PY 2022 to achieve the priorities, strategies and goals listed in the Consolidated Plan.

5. Geographic Distribution

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

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

- Identifies the total number of block groups in the grantee's jurisdiction;
- Subtracts the block groups with zero persons to determine the net number of block groups in the jurisdiction;
- Arranges the remaining block groups in descending order, based on LMI residents in the block group;
- Computes the last block group in the upper quartile by multiplying the net number of block groups by 25 percent; and
- Applies the "exception criteria" if the percentage of LMI persons in the last census block group in the top quartile is less than 51 percent.

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

The following narrative describes the characteristics of Village areas.

Low- and Moderate-Income Areas

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

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

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LMI Census Block Groups

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

Source: HUD

UCP Seguin of Greater Chicago and Y.E.M.B.A. are agencies with a proposed Public Facilities Improvements projects with a LMI Census Block Group. UCP Seguin is located in an LMI area – census tract 8131, block group 4. Y.E.M.B.A. is located in an LMI area – census tract 8125, block group 3.

Concentrations of Minority Persons

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

In Oak Park, African-American residents comprised 19.8% of the population. Therefore, an area of racial concentration includes census tracts where the percentage of African-American residents is 29.8% or higher. According to the latest American Community Survey five-year estimates, there are two census tracts that met the criteria for areas of racial concentration. These areas are:

- Census tract 8121 immediately to the north of census tract 8125 along the boundary of Chicago – 34.5%; and
- Census tract 8125 along the eastern boundary of Chicago in the central area of the Village – 31.6%.

There were no other areas of racial or ethnic concentration in the Village, as of the latest federal data.

Concentrations of LMI Persons and Minority Persons

Of the 14 census tracts which contained block groups identified as LMI areas, two tracts were also noted to be areas of racial concentration. With the inclusion of the specific block groups, these areas were census tract 8121, block group 1; and census tract 8125, block groups 1, 2 and 3.

6. Homeless Assistance Activities

In PY 2022, the Village will not receive Emergency Solutions Grant (ESG) program funds. More information regarding the Village's homelessness strategy can be found in Consolidated Plan. Through CDBG funds, Housing Forward will provide two services that will assist persons experiencing homelessness; employment readiness and interim housing shelter. Additionally, Housing Forward is the fiscal agent of the Oak Park Coalition to End Homelessness and receives administration funds to assist with planning efforts to end homelessness in Oak Park.

The Village of Oak Park will continue to collaborate with the Alliance to End Homelessness in Suburban Cook County Continuum of Care in order to address the needs of homeless individuals and families in Oak Park. The Village regularly attends Continuum of Care Prevention Committee and West Suburban Council on Homelessness meetings.

7. Other Actions

Introduction

The Village of Oak Park plans to address obstacles to meeting underserved needs, foster and maintain affordable housing, reduce lead-based paint hazards, reduce the number of poverty-level families, develop institutional structure and enhance coordination between public and private housing and social service agencies.

Actions Planned to Address Obstacles to Meeting Underserved Needs

The Village has identified several obstacles that will impede its ability to address the needs outlined in the Consolidated Plan and this draft Action Plan. These obstacles are listed below.

- The primary obstacle to meeting underserved needs in the Village of Oak Park is the limited financial resources available to address identified priorities. For example, in PY2022 there was a combined request of Public Service funds in the amount of \$486,00 and an allocation of \$233,000 CDBG funds available. Due to the 15% Public Service cap, this funding is consistently and significantly less than the amount requested to meet local goals. Thus, many worthwhile projects are funded at lower levels.
- The Village, along with most other communities, has even fewer resources available to address issues, as municipalities face revenue reductions. As a result of the COVID-19 pandemic, limited funding will continue to be a huge financial strain on the Village of Oak Park. However, due to the CDBG-CV funds made available, strains are improving and are available to provide additional assistance to the community.
- The relative absence of available developable land for new affordable housing construction, coupled with the extremely limited availability of existing residential structures available for purchase and rehabilitation, severely restrict the capacity of the Village to facilitate the expansion of the affordable housing stock (both owner and renter) in Oak Park.

The Village is part of a funder collaboration group that works towards developing ways to better reduce redundancy, coordinate, streamline the grant application and awarding process so that more can be achieved with limited resources. By working collaboratively with other funding partners, resources are leveraged to support local organizations. The level of grant management undertaken by subrecipients and providing clear and measurable outcomes to ensure resources are being utilized in the most effective and efficient way possible. This collaboration gains results by having clear and measurable outcomes, requested by the subrecipients, to ensure effectiveness. Furthermore, the CDBG Staff worked to update the PY 2022 grant and application to align like methods, reduce duplication, and maximize workflow.

The Village is identifying new and innovative ways to increase the affordable housing stock by coordinating with local agencies to identify areas of opportunity.

The Village of Oak Park has prioritized economic development. Section 108 is no longer offered through the Village of Oak Park. The Administrative Division of Development Customer Services Department is developing a replacement activity to ensure economic development goals, in accordance with the Consolidated Plan, are met.

Actions Planned to Foster and Maintain Affordable Housing

Oak Park has been investing its CDBG funds in housing rehabilitation with a focus on identifying ways to foster affordable housing. The following are actions that will be taken to increase the affordable housing stock in the community.

Overcoming Barriers to Affordable Housing

Several of the public policies that impact affordable housing in Oak Park are not under the control of Village government. Nonetheless, the Village is an active and supportive partner to area non-profit housing developers and other organizations involved in the creation of affordable housing opportunities for Oak Park residents. In addition to the Village's willingness to work with affordable housing developers, the Village implements programs and initiatives to address existing barriers to affordable housing that can be funded by CDBG and other funds. These initiatives are listed below:

- Single Family Housing Rehabilitation Program – Low-to Moderate Income Oak Park residents, who own and live in single-family houses, are eligible for federally funded rehabilitation home loans. Designed to improve the Village's housing stock, the loans are intended to bring structures into compliance with housing and building codes and to eliminate health and safety hazards. Funds also may be used for weatherization and to provide accessibility for the disabled.
- Lead Hazard Reduction Grant program - Primarily funded by CDBG but also will benefit from a grant from Cook County. This Cook County grant is called the *Lead Poisoning Prevention Program Grant*.
- Small Rental Rehab housing program - Assists owners of rental properties in rehabilitating their rental units. The property must be either a single-family detached rental dwelling or a multi-family rental building with fewer than eight units. A minimum project budget is \$2,000 per rental unit and the maximum is up to \$5,000 per rental

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unit, inclusive of contingency. The program provides forgivable loan funds to rental owners to correct code violations and serious housing quality deficiencies. The owners will be contracted to rent 51% of their rental units to low- and moderate-income households, at affordable rents.

- Energy Efficiency Grant - Designed to provide up to \$10,000 in financial assistance to very-low and low-income Oak Park residents seeking to reduce their home's consumption of energy, and owners of apartment buildings of up to seven (7) units. This program is designed to support the installation of insulation, energy efficient lighting, upgraded water heaters, improved air sealing, thermostat upgrades, and solar panels.
- Multi-family Housing Incentives Program - Provides grants to owners of multi-family apartment buildings. Owners are required to provide matching funds. Funds are to be used to improve the marketability of specific apartment units and for major system repairs. In exchange for the grants, multi-family owners commit to listing vacancies with the Oak Park Regional Housing Center. The Oak Park Regional Housing Center engages in affirmatively furthering fair housing choices to ensure that the Village maintains its diversity. Though the Multi-family Housing Incentive Program is not funded through CDBG funds, the Oak Park Regional Housing Center receives funds for fair housing initiatives.
- The Village continues to promote new commercial development to ease the reliance on residential real estate property taxes. Oak Park is also aware of the possibility of Village persons being displaced due to increased property taxes, and thus works with Housing Forward to prevent and support individuals impacted and at risk of homelessness.

Available Funds

The Village of Oak Park will apply \$276,000 in PY 2022 CDBG funds to Village lead hazard reduction grant activities, single family and small rental housing rehabilitation activities, and a programs delivery activity. The Single-Family Housing Rehabilitation program will begin the 2022 program year with \$175,000 in repaid CDBG loans for its revolving fund, bringing the total amount for Housing Programs to \$526,000. Moreover, prior year, returned funds in the amount of \$114,000 will be utilized for Single Family Housing Rehabilitation homeowner rehabilitation loans. These \$114,000 in funds are part of a contingency plan for housing at a time when loans are not scheduled to be paid back.

Actions to Evaluate and Reduce Lead-Based Paint Hazards

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

Oak Park Public Health Department Efforts

The Illinois Department of Public Health has identified all three of Oak Park's ZIP codes as high-risk ZIP codes for pediatric blood lead poisoning. High-risk ZIP codes are based on housing data and family economic status obtained from the latest census. Given the older housing stock in Oak Park and the corresponding probability that many of the Village's children are exposed to lead, the Village has committed to strong efforts in lead education, prevention

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and abatement. As a result, Oak Park children, with elevated blood levels receive local professional case management services through the Oak Park Public Health Department. The following activities constitute the Village's strategy to minimize exposure to and damage from lead-based paint.

- The Village of Oak Park Department of Public Health is committed to eliminating elevated levels of lead in children in Oak Park. The Village has an agreement with the Illinois Department of Public Health to provide case management services for all children that live within the boundaries of the Village. The Health Department is considered the State's "delegate agency" for childhood lead. The Health Department participates in public awareness and education campaigns, provides nursing lead case management and will conduct environmental investigations, when required, under the Illinois Lead Poisoning Prevention Act and the Illinois Lead Poisoning Prevention Code.
- Due to the age of the Village of Oak Park housing stock, all of Oak Park's ZIP codes are defined as high risk for pediatric blood lead poisoning. As a result, every physician licensed to practice medicine is required to provide annual testing of children from 6 months of age through 6 years of age. In addition, child care facilities must require that all parents or guardians of a child 6 months through 6 years of age provide a statement from a physician or health care provider as proof that a blood test occurred prior to admission. Physicians are required to submit lead sampling results to the Illinois Department of Public Health, where the sampling data is then entered into a data surveillance system called *HHL PSS (Healthy Homes and Lead Poisoning Surveillance System)*. The Health Department is responsible for reviewing blood lead sample test results using the *HHL PSS* data management system. Staff review lead results to determine whether case management is required and/or whether a childhood lead case should be referred to the Environmental Health Division for an environmental investigation of the child's dwelling.
- The Health Department is responsible for managing and maintaining *HHL PSS*. In PY 2022, the Health Department will manage childhood blood lead test results through *HHL PSS*.

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

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

Environmental Investigation/Assessment: An environmental investigation is conducted under the following circumstances:

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- A child six years of age and younger with a confirmed lead blood lead level of 5 µg/dl or above.

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

Federally Assisted Housing Programs/Activities to Reduce Lead Hazards

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

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

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

The Village's process for lead paint hazard reduction will include hiring general contractors with licensed workers or subcontractors to perform the lead hazard reduction construction work. A specification-writing software system, that includes lead reduction work, is in place. If warranted, relocation assistance will be provided.

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

Actions to Reduce the Number of Poverty Level Families

The Village will participate in a variety of activities, throughout the upcoming program year, in an effort to reduce the number of low-income families and increase self-sufficiency. Several activities funded through the CDBG program will work towards this goal. Additionally, under normal circumstances, the Village Community Relations Department hosts a youth employment program in the summer months which provides soft skills development along with employment skills training to participants.

The Village is committed to helping to reduce poverty by making housing more affordable,

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

The Village can directly impact some of poverty's primary causal factors, which include poor-quality housing, expensive housing, lack-of education, unemployment, low income and ill health. The Village can make an impact by utilizing resources, improving housing stock, and assisting in the provision of vital social services, employment opportunities, public health services and an excellent educational system. The multi-pronged approach provided by the programs run by the Village and its subrecipients have the ability to reduce the number of households with incomes below the poverty level. Specific components of the Village's poverty-reduction strategy are listed below. In addition to supporting the initiatives of local organizations that serve low- and moderate-income residents, by providing employment training, case management, interim housing shelter and other social services, the Village of Oak Park administers programs that aim to mitigate poverty.

Housing

Limited availability of affordable housing places residential cost burdens on low- and moderate-income persons, reducing the ability to pay for other goods and services, such as quality education or needed prescriptions. The Village's housing efforts are aimed at improving and maintaining a high standard of housing quality while also creating and maintaining affordability.

The Village's Single Family Housing Rehabilitation Program helps lower-income owners make much-needed repairs, which enables them to remain in their homes. The Small Rental Rehabilitation Program provides assistance to building owners to make needed repairs on their multi-family rental properties. After rehabilitation, these owners will provide those repaired units to renters under affordable rent limits, for a period of two years.

The Village will also work closely with agencies that provide expanded housing options to current and potential Oak Park residents. One such agency is the Oak Park Regional Housing Center, which assists many lower-income renters. The Village is committed each program year to continuing to remove the impediments to fair housing choices for all protected classes and affirmatively furthering fair housing choices, as evidenced by Oak Park allocating a large part of its total CDBG allocation to Oak Park Regional Housing Center's fair housing activities.

Social Services

The Village supports other important services by allocating PY 2022 CDBG Public Services category dollars to local social service agencies.

The CDBG subrecipients offer many social service programs in the Village to aid persons with incomes below the poverty level. For example, the Village increases family self-sufficiency by funding New Moms, Beyond Hunger, and Housing Forward, which prevents, eliminates or ameliorates homelessness.

The CDBG subrecipients provide a variety of supportive services such as employment readiness, job placement, substance use disorder treatment, case management, education (G.E.D.), day care, behavioral health services, independent living skills education, respite, case

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management, domestic violence supports, and the provision of basic needs. In addition, Housing Forward provides homelessness preventative services that promote emotional and economic independence and create long-term change in the lives of persons experiencing homelessness.

The Village Health Department is a state-certified local health department that is responsible for protecting the community's health from preventable death, disease, illness and injury. The Health Department identifies community health concerns and potential epidemics, develops health policies, enforces local ordinances and links residents to a wide range of direct services. Programs include health education, prevention services, emergency preparedness, case management, counseling and referral to other community health partners. The Health Department often provides consultation and referral services for low income and uninsured residents. During the COVID-19 pandemic, the Health Department was invaluable to the residents and businesses of Oak Park.

The Village's Public Health Department administers the CDBG-funded Healthy Nutrition Incentives project. This program provides incentives for LINK card users to purchase farm-fresh healthy products from the Oak Park Farmers Market.

Economic Development

The Village initiated an effort to promote new commercial development to ease the reliance on property taxes. Recognizing that property taxes can increase the cost of housing and affect the Village's ability to provide affordable housing.

The Village has an array of business services programs designed to enhance local business activity. Examples of these programs include the Village's efforts to increase the number of minority- and women-owned businesses doing business in Oak Park. Moreover, the Village and the Village-funded Oak Park Economic Development Corporation both work on business retention and economic development expansion. The Oak Park Economic Development Corporation works diligently to grow the Village's economy, specifically by working to redevelop vacant or underperforming commercial corridors. The creation of good jobs locally will increase employment opportunities, giving low-income residents a chance to increase their incomes.

The Village of Oak Park no longer has a Section 108 loan through HUD. During PY22, the Administrative Division of Development Customer Services Department, by way of community outreach, are developing a replacement activity to ensure the Economic Development goals, in accordance with the Con Plan, are met.

Developing a variety of businesses in Oak Park is critical to providing living-wage jobs for a diverse population with multiple jobs skills and experiences. Economic Development is accomplished by utilizing many different funding sources.

Actions Planned to Develop Institutional Structure

Village staff works throughout the year to increase institutional structure, both within the Village and with our partner agencies. Staff maintains contact with partner agencies, offering referrals for funding and training opportunities. Staff also attends relevant virtual training and conferences on all aspects of grant and project management.

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The Village staff participate on the Oak Park Homelessness Coalition, which is comprised of a variety of organizations and individuals working to end homelessness in the community. The Coalition has a primary goal of making homelessness rare, brief, and one-time. The Village staff participate with a coalition of funders operating both in the community and in surrounding areas to investigate ways to better coordinate funding and leverage funds to collectively fund services that meet the community need and provide measureable outcomes. The Village staff participate in the National Community Development Association and serve on the technology committee.

The Administrative Development Customer Services Department of the Village of Oak Park, works with the network of local organizations through which it will eventually carry out the Action Plan. In administering its programs, the Village works within a local government landscape that includes Oak Park Township, Elementary and Middle School District 97, High School District 200, the Oak Park Park District, the Oak Park Public Library, the Oak Park Housing Authority/Residence Corporation and the Community Mental Health Board of Oak Park Township.

In contracting with non-profit agencies to deliver the community programs and services outlined in the draft Action Plan, the Village uses its annual budget process to coordinate and allocate funding. The Village's governing body, the Village Board of Trustees, receives public input from the Community Development Citizens Advisory Committee (CDCAC) regarding the allocation of CDBG funds.

Non-profit CDBG subrecipients are monitored based on a risk analysis, and previous performance is reported, by Village staff, to the CDCAC when agencies apply for funding. Many of the Village's largest contract service providers, or "community partners," receive funding from other sources. The community partners funding includes local Village funds, other government or private grants, user fees, operating income and member support.

Coordination among agencies in the development and implementation of housing and community development programs and services is critical in efforts to maximize the use of limited resources. The Village is committed to the close coordination of all of its programs with other agencies at a variety of levels:

- **Local level:** The Village participates in the Oak Park Homelessness Coalition, a local body with the purpose of helping persons experiencing homelessness and those at risk. The Village maintains relationships with private entities and local economic development agencies. The Village's primary means of coordination with non-profit partners is through yearly contracts with grant subrecipients. The proposal process, whereby the Village allocates funds to community partners, as well as the ensuing agreements, gives the Village a clear view of the provided services and related costs. The Village's extensive project performance review process also enhances coordination.
- **Regional level:** The Village participates in the Alliance to End Homelessness in Suburban Cook County (Continuum of Care lead agency). The Village also participates in a group of area funders in order to better coordinate services to non-profits and to increase the impact of west Cook County grants funding efforts.

- **National level:** The Village is affiliated with and implements best practices from the National Community Development Association and other organizations that support local governments.

Actions Planned to Enhance Coordination Between Public and Private Housing and Social Service Agencies

Through the Consolidated Plan consultation process, good coordination and collaboration was identified as a key priority for the Village and its partners. To address this need, the Village is involved with the meeting of community funders.

The CDBG Public Service applicants include in the written narrative how they are coordinate with other social service organizations throughout the community. If the applicants do not have established connections in the community, they outline the plans and timeline for implementing a collaborative process. This effort improves collaboration for awarded agencies and allows the Village the ability to identify other areas for additional coordination.

Many of the funded agencies participate in the Continuum of Care and work closely with other non-profits to identify opportunities for persons in the community. The Village attends Continuum of Care Prevention-Diversion Committee and West Suburban Council on Homelessness meetings. The Village served on the core committee that evaluated the RFP for comprehensive Coordinated Entry services and operations in Suburban Cook County.

The Village of Oak Park is committed to increasing community partnerships and investing in economic and neighborhood development. The actions identified throughout the plan will further this commitment and will increase opportunities for low- and moderate-income residents to receive necessary services and obtain access to affordable housing options.

8. Program Specific Requirements

Grant staff are responsible for ensuring compliance with all program specific requirements, as well as for program monitoring and reporting. In addition, staff ensures that federal cross-cutting requirements (such as Davis-Bacon and Related Acts) are met. A vital way to ensure compliance is by monitoring.

Monitoring of Activities

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

Administrative Monitoring

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

Subrecipient Monitoring

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

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

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

Village staff tracks the progress of projects, calling to inquire about progress if inconsistencies arise. Forty days before the end of each program year, the Village sends a letter to subrecipients reminding them that project expenses must be incurred before the end of the program year and that requests for payment must be received within 30 days after the program year's end.

Finally, every CDBG program subrecipient submits quarterly reports describing activities of the previous quarter. The reports are required in order to draw down funds. Subrecipients also submit an annual report at the end of the program year, summarizing the events and numbers of the entire program year. All of these reports require extensive documentation of project progress and beneficiaries, as well as items to be reported quarterly and annually in the Integrated Disbursement and Information System (IDIS).

IDIS is a HUD-administered financial and programmatic grants information management system, connected nationally through the Internet. The system is a mandatory reporting instrument, which was first accessed by the Village of Oak Park in 1998.

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