

County of Cook, Illinois



ANNUAL ACTION PLAN

DRAFT FOR PUBLIC REVIEW/COMMENT

Program Year 2013

(October 1, 2013 – September 30, 2014)

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Cook County Board of Commissioners

Prepared by: The Department of Planning and Development
of the Bureau of Economic Development

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APPENDIX



Annual Action Plan Fourth Program Year

The Annual Action Plan includes narrative responses to Annual Action Plan questions as well as related forms and tables that CDBG, ESG, and HOME grantees must respond to each year in order to be compliant with HUD consolidated planning regulations. This Annual Action Plan covers the fourth program year related to the current Consolidated Plan.

Narrative Responses

GENERAL

Executive Summary

The Annual Action Plan is designed as a “concise summary of the actions, activities, and the specific Federal and non-Federal resources that will be used each year to address the priority needs and specific goals identified by the Consolidated Plan”. This Annual Action Plan consists of the fourth year of the current 2010-2014 Consolidated Plan and covers Program Year 2013, which runs from October 1, 2013 through September 30, 2014.

The Annual Action Plan constitutes Cook County’s application to the U.S. Department of Housing and Urban Development (HUD) for continued entitlement funding for the following programs:

- Community Development Block Grant (CDBG)
- Emergency Solutions Grants (ESG) (formerly known as the Emergency Shelter Grants)
- HOME Investment Partnerships

The programs and projects outlined in the Annual Action Plan are restricted to Cook County’s jurisdiction under the CDBG Urban County and HOME Consortium. Presently, the CDBG Urban County includes all suburban municipalities under 50,000 in population, unincorporated areas, and the City of Chicago Heights. All members of the CDBG Urban County are automatically members of the HOME Consortium. In addition, the Town of Cicero, the Village of Oak Park, and the City of Berwyn are also members of the HOME Consortium and receive ESG funding through Cook County. Chicago and Evanston receive HOME and ESG entitlement funds direct from HUD. Under an initiative jointly led by HUD Region V and Cook County executive leadership, efforts are currently underway to solicit the addition of the following communities to the Consortium and/or Urban County: Arlington Heights, Des Plaines, Hoffman Estates, Mount Prospect, Oak Lawn, Palatine, Schaumburg, and Skokie.

The Cook County Board of Commissioners has designated the Department of Planning and Development within the Bureau of Economic Development to serve as the lead agency for administration of all HUD-funded programs on behalf of suburban Cook County.

In Program Year 2013, the budget for Cook County's HUD programs is \$17,977,212 and consists of the following resources:

Source	Entitlement Grant	Match	Program Income
CDBG	\$9,879,916	N/A	\$100,000
ESG	\$641,618	\$641,618	N/A
HOME	\$4,011,248	\$1,002,812	\$1,700,000
TOTAL	\$14,532,782	\$1,644,430	\$1,800,000

Please note – the estimated budget includes entitlement grant allocations, anticipated program income (which may or may not be received), and required matching resources (to be furnished by funding recipients based upon eligible match sources).

In addition, program income under CDBG is limited to repayments of previously provided owner-occupied single-family rehabilitation loans. The majority of these loans were structured with repayment due only upon sale or transfer. As such, anticipated repayments are sporadic and difficult to predict. Upon receipt of CDBG program income, the County will advise HUD regarding intended use via a Substantial Amendment to the Annual Action Plan or in the next Annual Action Plan as appropriate.

As noted earlier, the Annual Action Plan correlates with the current Consolidated Plan, which outlined the following strategies over the covered five-year term. Please note – based upon assessed need and available resources, some strategies are not addressed in each Annual Action Plan.

Affordable Housing Strategies

- 1.1 Affordable Housing Program:** Provide financing to qualified developers to preserve and increase the supply of affordable multi-family rental housing units through acquisition, rehabilitation, and new construction of rental housing for low- and moderate-income households.
- 1.2 Tenant-Based Rental Assistance:** Provide rental assistance to low- and extremely low-income renter households at risk of homelessness.
- 1.3 Homeowner Rehabilitation:** Provide financial assistance to existing homeowners to preserve and improve the existing supply of affordable owner-occupied housing units through rehabilitation and energy efficiency improvements.
- 1.4 Homebuyer Assistance:** Provide financing and HUD-certified counseling to qualified low-and moderate-income households looking to purchase their first home.

Homeless Strategies

- 2.1 Shelter Operations:** Provide support and assistance to the Continuum of Care and the network of emergency shelter transitional housing, and homeless service providers in order to accomplish the ultimate goal of moving homeless individuals and families into permanent housing situations.
- 2.2 Homeless Prevention:** Provide financial and counseling assistance to organizations that assist individuals and families at risk of becoming homeless.
- 2.3 Permanent Supportive Housing Development:** Provide financing to qualified developers to increase the supply of permanent supportive housing opportunities for chronically-homeless persons.

- 2.4. Permanent Supportive Housing Rental Assistance:** Provide tenant-based rental assistance to support permanent supportive housing opportunities for chronically homeless persons.

Supportive Housing Strategies

- 3.1 Permanent Supportive Housing Development:** Provide financing to qualified developers to preserve and increase the supply of permanent supportive rental housing through acquisition, rehabilitation, and new construction.

Community Development Strategies

- 4.1 Facilities and Infrastructure Improvements:** Provide assistance to targeted low-income communities to upgrade infrastructure, capital improvement projects, and public facility improvements, with a focus on low- and moderate-income areas.
- 4.2 Housing Services:** Increase the level of housing-related public services available and accessible to low- and moderate-income households.
- 4.3 Social Services:** Provide financial assistance to non-profits and public agencies to increase the availability of community-based services designed to enhance the quality of life for low- and moderate-income households.
- 4.4 Economic Development:** Provide economic development assistance to new and existing businesses to retain or create new employment opportunities for low- and moderate-income persons.
- 4.5 Blight Removal:** Clear and remove blighted structures that destabilize neighborhoods and detract from neighborhood investment in order to redevelop the property that contributes to the sustainability of the area.
- 4.6 Neighborhood Planning:** Provide planning assistance to communities and neighborhoods in CDBG-eligible areas.

The programs and projects proposed to be funded with CDBG, ESG, and/or HOME funds conform to HUD's Community Planning and Development Performance Measurement Framework consisting of the following objectives and outcomes:

Objectives

- Suitable Living Environment
- Decent Housing
- Economic Opportunity

Outcomes

- Availability/Accessibility
- Affordability
- Sustainability

In Program Year 2013, Cook County HUD resources will be allocated in accordance with the following objectives/outcome structure (exclusive of dollars utilized for internal program administration):

OBJECTIVES & OUTCOMES	Availability	Affordability	Sustainability	TOTALS
Suitable Living Environment	\$1,401,800 (CDBG) \$593,500(ESG)	\$0	\$5,366,880 (CDBG)	\$7,362,180
Decent Housing	\$0	\$3,610,123 (HOME) \$441,909 (CDBG)	\$0	\$4,052,032
Economic Opportunity	\$450,000 (CDBG)	\$0	\$0	\$450,000
TOTALS	\$2,445,300	\$4,052,032	\$5,366,880	\$11,864,212

Public Participation

This Annual Action Plan was developed in accordance with Cook County's current Citizen Participation Plan, which facilitates public input and comment for all HUD-funded programming. The public consultation process for Program Year 2013 was inclusive of informational meetings/webinars, pre-application workshops, a Community Development Advisory Council (CDAC) public hearing, and a Cook County Board of Commissioners public session. The Draft Annual Action Plan was made available to the public for review and comment for thirty days via the Cook County website as well as on-site at Cook County offices. All related public meetings as well as availability of the draft plan for public review and comment were advertised via local newspaper as well as the Cook County website, blog, and listservs. A summary of any public comments received and related County responses, as available, may be found in the Appendix.

Past Performance

Given the reorganization of the Department of Planning and Development into the newly formed Bureau of Economic Development and ongoing internal restructuring, Cook County continues to evaluate progress and challenges to date as a means to inform current and future operations and strategies.

Cook County CDBG dollars have supported various community and economic development activities including but not limited to infrastructure improvements, public facilities, public services, demolition, and housing rehabilitation. In a typical year, CDBG provides direct benefits (through a funded service or facility) to approximately 90,000 residents, 70% of whom are low- and moderate- income. While Cook County has faced challenges in meeting HUD's timeliness ratio requirements recently, a strategy to address this issue has been implemented. Significant progress has been made in the commitment and expenditure of older CDBG funds including the successful reallocation of approximately \$8.5 million since 2012. A significant data cleanup initiative in the Integrated Disbursement and Information System (IDIS) was also launched resulting in the cancellation, completion, or revision of activities as appropriate. These efforts will continue in Program Year 2013.

Cook County ESG dollars subsidize the operations of essential homeless shelters and support the provision of services that serve as a safety net for those most in need. In a typical year, ESG benefits more than 8,000 persons who are homeless or at-risk of homelessness. Given the recent Federal redesign of the ESG program and increase in funds awarded, Cook County anticipates an expanded program impact in Program Year 2013.

Since program inception in 1992, Cook County HOME dollars have supported the development or preservation of affordable housing through assistance to 2,408 rental, 297 homebuyer, and 550 homeowner units and households. Cook County has received \$117,642,536 in HOME funding to date. Cumulatively, over 90% of all funds received have been formally committed and 81% disbursed. Cook County ranks first in the State in leveraging for rental activities as noted in the HUD HOME Snapshot Report as of March 31, 2013. Significant progress has been made recently in the commitment and expenditure of older HOME funds including the successful retention of nearly \$5 million at risk of recapture dating back to 2003, 2004, and 2005. A significant data cleanup initiative in the Integrated Disbursement and Information System (IDIS) was also launched resulting in the cancellation, completion, or revision of activities as appropriate. Additional Community Housing Development Organization (CHDO) certifications and related operating grants have also been processed, enhancing local non-profit development capacity. Housing Action Illinois, a HUD-approved technical assistance provider, is assisting with this ongoing CHDO certification effort.

In Program Year 2013, these efforts to enhance internal and funding recipient capacity as well as improve funding commitment, disbursement, and project completion rates will continue and expand. While recent decreases in Federal entitlement dollars nationwide will be challenging given increasing community needs and service demands, Cook County is poised to move forward to seek and solicit additional competitive funding, better evaluate critical local needs, and strategically leverage available resources under the leadership of newly appointed senior management including the Bureau Chief, Director, and three Deputy Directors, focused upon housing, community, and economic development respectively.

General Questions

- 1. Describe the geographic areas of the jurisdiction (including areas of low income families and/or racial/minority concentration) in which assistance will be directed during the next year. Where appropriate, the jurisdiction should estimate the percentage of funds the jurisdiction plans to dedicate to target areas.*

Historically and in Program Year 2013, Cook County HUD funding will be disbursed throughout suburban Cook County in accordance with the current jurisdictional boundaries under the CDBG Urban County and HOME Consortium. However, higher proportions of funding have focused in the South and West sub regions of the County based upon identified needs and program/project eligibility. The summary below indicates geographic disbursement of CDBG, ESG, and HOME funds based upon proposed programs/projects excluding administration:

Sub Region	CDBG Funding Amount	CDBG Funding Percentage	ESG Funding Amount	ESG Funding Percentage
South	\$3,547,570	54.5%	\$241,500	41%
West	\$2,380,610	36.6%	\$137,000	23%
North	\$425,500	6.5%	\$113,000	19%
Countywide	\$155,000	2.4%	\$102,000	17%
TOTAL	\$6,508,680	N/A	\$593,500	N/A

It is anticipated that strategic leveraging and geographic targeting of funds will be further addressed as part of the next Consolidated Plan.

2. Describe the basis for allocating investments geographically within the jurisdiction (or within the EMSA for HOPWA) (91.215(a)(1)) during the next year and the rationale for assigning the priorities.

Presently, funds are not specifically set-aside for particular geographic areas. Under each program, proposed programs or projects are evaluated based upon general eligibility, applicant capacity, fulfillment of local need, leverage of additional resources, etc. In 2013, Cook County will continue to explore methods for improved coordination and targeting of resources under HUD funded programs. It is anticipated that the next Consolidated Plan will establish such a framework.

3. Describe actions that will take place during the next year to address obstacles to meeting underserved needs.

The Consolidated Plan identified several barriers to fulfilling underserved needs. However, the key obstacle concerns a lack of available resources. Recent reductions in Federal formula grant programs coupled with limited municipal capacity to address key issues in suburban communities have spurred Cook County to pursue competitive grant opportunities to supplement existing dollars. Cook County also realizes that it must make the most of the funding that it does have by targeting sub-regional clusters in the North, West, and South with strategies and investments reflecting local needs. In 2013, Cook County will continue to assess local needs and related capacity and resources as part of developing a more strategic investment framework.

4. Identify the federal, state, and local resources expected to be made available to address the needs identified in the plan. Federal resources should include Section 8 funds made available to the jurisdiction, Low-Income Housing Tax Credits, and competitive McKinney-Vento Homeless Assistance Act funds expected to be available to address priority needs and specific objectives identified in the strategic plan.

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Please note – the estimated budget includes entitlement grant allocations, anticipated program income (which may or may not be received), and required matching resources (to be furnished by funding recipients based upon eligible match sources).

In addition, program income under CDBG is limited to repayments of previously provided owner-occupied single-family rehabilitation loans. The majority of these loans were structured with repayment due only upon sale or transfer. As such, anticipated repayments are sporadic and difficult to predict. Upon receipt of CDBG program income, the County will advise HUD regarding intended use via a Substantial Amendment to the Annual Action Plan or in the next Annual Action Plan as appropriate.

Cook County is also in the process of closing out the following stimulus grant programs:

- Community Development Block Grant Recovery Act (CDBG-R): \$2,853,255
- Neighborhood Stabilization Program (NSP) – 1: \$28,156,321

Cook County continues to administer the following stimulus grant program with expenditures ongoing:

- Neighborhood Stabilization Program (NSP) – 3: \$7,776,324

In addition to these aforementioned, the following resources will be administered within Cook County by other agencies:

- Continuum of Care - \$9,472,530

Given recent decreases in available entitlement funds at the national level, HUD and Cook County continue to explore methods for consolidating grant operations for the more effective use of available resources. Towards this end, efforts are also currently underway, in cooperation with HUD leadership, to explore adding current non-member jurisdictions to the HOME Consortium and/or CDBG Urban County, which has the potential to reduce administrative costs and duplication between local municipalities, the County, and HUD. In addition, the addition of these members will permit HUD to count their population in the calculation of the County's annual entitlement allocations potentially increasing available funds.

Managing the Process

1. Identify the lead agency, entity, and agencies responsible for administering programs covered by the consolidated plan.

Cook County is governed by the County Board President and the 17-member Board of Commissioners, who are elected to a four-year term. The President and Board approve all projects for the Community Development Block Grant (CDBG), Emergency Solutions Grants (ESG) and HOME Investment Partnerships (HOME) Programs. The Board has designated the Department of Planning and Development within the Bureau of Economic Development to serve as the lead agency for administration of HUD-funded programs on behalf of suburban Cook County.

The mission of the Bureau is to: “foster economic development and job growth within Cook County to promote sustainable community investment, business growth, attraction, and retention, affordable housing, regional planning, and workforce development”. In addition to the Department of Planning and Development, the Bureau includes the following departments: Capital Planning and Policy, Real Estate Management, Building and Zoning, and Cook County Works.

The mission of the Department of Planning and Development is to develop sustainable and vibrant urban communities by: “fostering economic opportunities and business development, preserving and expanding the supply of decent, affordable housing, promoting fair housing, and supporting programs that address the problems of homelessness.”

2. Identify the significant aspects of the process by which the plan was developed, and the agencies, groups, organizations, and others who participated in the process.

The County works in cooperation with local governments, councils of government, private and public agencies, for profit and nonprofit organizations, and the general public to develop the Annual Action Plan to address the housing, community, and economic development needs of suburban Cook County. This outreach has helped Cook County develop more meaningful plans, use limited resources more efficiently, and reduce gaps in delivering services. The following table summarizes the process by which this Annual Action Plan was developed:

Date	Action
January 18 and 24, 2013	CDBG Application Release
January 24, 2013	ESG Application Release
January 31, 2013	CDBG Pre-Application Workshop
January 31, 2013	ESG Pre-Application Workshop
Ongoing – Rolling Cycle	HOME Application Release and Deadline
March 8, 2013	CDBG Application Deadline
March 1, 2013	ESG Application Deadline
May 21, 2013	Community Development Advisory Council Review and Approval
May 30, 2013	30-Day Public Comment Period Begins
June 30, 2013	30-Day Public Comment Ends
July 17, 2013	Cook County Board Review and Approval
August 15, 2013	Annual Action Plan HUD Submittal

3. Describe actions that will take place during the next year to enhance coordination between public and private housing, health, and social service agencies.

Cook County leadership continues to actively participate in informal discussions, regular meetings, and training series at the national (National Association of Counties - NACO, National Association for County and Community Economic Development – NACCED, etc.), state (Governor’s Conference on Affordable Housing, etc.), regional (Chicago Metropolitan Agency for Planning – CMAP, Metropolitan Planning Council – MPC, Urban Land Institute – ULI, Federal Reserve Bank of Chicago, etc.), and local/sub regional (South Suburban Mayors and Managers Association, Chicago Southland Economic Development Corporation, West/Northwest/South housing collaboratives, etc.) levels so that County initiatives are coordinated with the programs of other public and private entities.

Within the County, under the President’s leadership, efforts to promote interagency and interdepartmental communication and collaboration have intensified. The Department actively consults with other departments within the Bureau of Economic Development and across Cook County government to disseminate information and target resources in pursuit of our mission. In the past year, the Department collaborated with the County’s Environmental Control Department on two Environmental Protection Agency (EPA) grant applications as well as several County Departments and partners on a proposal to the Attorney General for support of the newly formed Cook County Land Bank. Discussions regarding potential collaborative grant opportunities are ongoing. In addition, the Department has worked with The Highway Department to commit funds to the Center Avenue project as well as coordinate construction management of road projects. The Department is also working with the Department of Capital Planning to access their approved construction management and construction contractors.

In the coming year, the Department will begin work on updating the Consolidated Plan (due in 2015) that will be designed to strategically guide investments to more sustainable locations for purposes that address needs identified by a diverse set of stakeholders.

Citizen Participation

1. Provide a summary of the citizen participation process.

This Annual Action Plan was developed in accordance with Cook County's current Citizen Participation Plan, which facilitates public input and comment for all HUD-funded programming. During Program Year 2012, Cook County updated its Citizen Participation Plan to improve HUD compliance as well as more effectively engage the public in Cook County programs. The Cook County Department of Planning and Development currently solicits public input and comment regarding HUD-funded programs several times a year via informal and formal methods including electronic newsletters, electronic surveys, stakeholder and focus groups, and public hearings. At a minimum, The Department conducts two public hearings annually to provide basic information and discuss local needs, present and prioritize proposed activities, and evaluate performance. Informally, the Department collects input every time it meets with funding recipients, intermediaries, and community representatives as part of the normal course of carrying out its work program.

Public comment periods and related public hearings through the Cook County Community Development Advisory Council (CDAC) are publicized in a local newspaper with wide circulation and on our website in advance. Reports requiring public comment are also published on our website. In addition, all public comments received as well as related responses are summarized by County staff and submitted to HUD along with related plans and reports.

The public consultation process for Program Year 2013 was inclusive of informational meetings/webinars, pre-application workshops, a Community Development Advisory Council (CDAC) public hearing, and a Cook County Board of Commissioners public session. The Draft Annual Action Plan was made available to the public for review and comment for thirty days via the Cook County website as well as on-site at Cook County offices. All related public meetings as well as availability of the draft plan for public review and comment were advertised via local newspaper as well as the Cook County website, blog, and listservs. A summary of any public comments received and related County responses, as available, may be found in the Appendix.

2. Provide a summary of citizen comments or views on the plan.

Summary of public hearings conducted in relation to the plan detailing public comments and County responses are enclosed in the Appendix.

3. Provide a summary of efforts made to broaden public participation in the development of the consolidated plan, including outreach to minorities and non-English speaking persons, as well as persons with disabilities.

Please see above responses.

4. Provide a written explanation of comments not accepted and the reasons why these comments were not accepted.

Summary of public hearings conducted in relation to the plan detailing public comments and County responses are enclosed in the Appendix.

Institutional Structure

1. Describe actions that will take place during the next year to develop institutional structure.

In 2013, Cook County will continue to strengthen the capacity of its partner organizations through funding and technical assistance provision including ongoing support for Cook County-designated HOME Program Community Housing Development Organizations (CHDOs). Cook County continues to maintain an active dialogue with Housing Action Illinois and Chicago Rehab Network who receive funding direct from HUD to provide technical assistance to current or prospective CHDOs. HOME assistance will also continue to be provided for operating support for eligible CHDOs based upon funding availability and eligibility.

Internally, the Bureau and the Department will continue to reorganize operations and staffing to improve program and project outcomes and enhance relative impacts.

Intensive efforts to commit and spend older, unexpended CDBG and HOME funds will continue through 2013. While significant progress has been made, specifically in relation to CDBG, ESG, and HOME funding reservation, commitment, and expenditure ratios, these efforts will be strengthened in 2013. This funds management strategy includes the cancellation of projects that have not progressed and the reallocation of their unexpended funds to other eligible activities as well as the completion of overdue projects that did achieve significant benchmarks but were still unfinished. Stricter monitoring and enforcement of significant project benchmarks will be a hallmark of management's efforts to ensure future compliance with the timeliness standard.

Monitoring

1. Describe actions that will take place during the next year to monitor its housing and community development projects and ensure long-term compliance with program requirements and comprehensive planning requirements.

Cook County continues to analyze and update its monitoring policies and procedures for all HUD-funded programs to better comply with HUD requirements. Refinement of monitoring protocols continues. Monitoring processes are being restructured to include both desk and on-site review of agency, programmatic, project, and financial components. Monitoring is employed both during the life of an active project or program as well as upon project completion through the applicable affordability period (specific to HOME). Towards this end, related forms, policies, and procedures will be fully updated in 2013. As this issue intersects all HUD programs, Cook County is hopeful that technical assistance provided via the OneCPD initiative can further assist in this effort. The pending revision of the HOME rule will also impact this initiative.

In the interim, primary monitoring documents (including basic inspection forms, monitoring and reporting forms, risk assessment criteria, and monitoring schedules) have been developed. All actively funded entities must report to the County at least annually as it relates to progress and challenges; CDBG-funded projects currently report quarterly. Field visits are also regularly conducted by County staff to assess program/project status. Housing construction inspections occur at least monthly and disbursement of related funds is contingent upon County assessment of sufficient and appropriate progress. Basic spreadsheet-based tracking tools for monitoring active projects have also been implemented across the programs. Based upon the guidance of newly hired senior management, it is anticipated that staff will be redeployed as appropriate to more effectively fulfill monitoring duties.

In addition, Cook County continues to actively participate in an Interagency Housing Council (consisting of HUD, Illinois Housing Development Authority (IHDA), City of Chicago, and Cook County senior and program management) to explore options for consolidation of processes and documentation including those related to monitoring. In 2012, a universal tenant income certification form for assisted rental housing developments was jointly implemented. Additional options for consolidation and coordination currently under discussion include construction management operations and property management training.

Lead-based Paint

- 1. Describe the actions that will take place during the next year to evaluate and reduce the number of housing units containing lead-based paint hazards in order to increase the inventory of lead-safe housing available to extremely low-income, low-income, and moderate-income families, and how the plan for the reduction of lead-based hazards is related to the extent of lead poisoning and hazards.***

Cook County will continue to ensure that all Federally-funded programs and/or projects remain compliant with HUD lead-based paint hazard rules and regulations including verification that project personnel maintain active appropriate industry certifications, that abatement and remediation activities follow proper HUD and EPA protocols, and that current or potential housing occupants receive appropriate information and education.

The Cook County Department of Public Health aims to reduce lead hazards and limit potential exposure through the ongoing conduct of outreach and education related to the risks of lead exposure as well as preventative measures and resources. This Department also monitors lead exposure prevalence throughout suburban Cook County via regular testing.

HOUSING

Specific Housing Objectives

- 1. Describe the priorities and specific objectives the jurisdiction hopes to achieve during the next year.***

The County's affordable housing programs and projects are primarily supported with HOME funding. Cook County operates as the lead agency for the Cook County HOME Consortium and administers HOME funds on behalf of suburban Cook County. The HOME Consortium includes all suburban municipalities under 50,000 in population, unincorporated areas, Chicago Heights, Berwyn, and Cicero. It excludes Chicago and Evanston, which receive direct allocations of HOME funding from HUD. Under an initiative jointly led by HUD Region V and Cook County executive leadership, efforts are currently underway to solicit the addition of the following communities to the Consortium: Arlington Heights, Des Plaines, Hoffman Estates, Mount Prospect, Oak Lawn, Oak Park, Palatine, Schaumburg, and Skokie.

In Program Year 2013, Cook County HOME funding will be disbursed throughout suburban Cook County. Cook County recognizes that needs vary by sub-region within the County and prioritizes investments that are tailored to address these divergent needs. Historically, higher proportions of funding have focused in the South and West sub regions of the County based upon identified needs and program/project eligibility. However, it is anticipated that geographic targeting of HUD funds will be addressed as part of a strategic plan that will be developed later this year as well as in the next Consolidated Plan.

HOME funds are utilized in partnership with public, private, and non-profit organizations to support the development of decent, safe, and affordable housing for rent or sale to low-income households. In accordance with program requirements, all HOME activities must benefit low-income households whose

income does not exceed 80% of the area median income. Additional income restrictions apply to rental housing projects with 5 or more HOME-assisted units.

The usage of Cook County HOME funds is restricted to suburban Cook County. All proposed HOME projects must be determined to be consistent with Cook County's current 2010-2014 Consolidated Plan. Given the cyclical nature of affordable housing development, proposed HOME projects are presented to the Cook County Board of Commissioners for review and approval throughout the year as appropriate.

The Cook County Bureau of Economic Development issued a Request for Applications (RFA) on February 8, 2012 with responses due on March 12, 2012. Applications that met HOME eligibility thresholds and have secured financing commitments for the balance of the proposed project are currently under review. Remaining applications that have not yet secured financing commitments for the balance of the proposed project are being held for review pending the outcomes of those funding solicitations. Contingent upon successful underwriting and Board approval, these proposed projects will be funded with older available HOME funds, which pre-date the Program Year 2013 HOME funding allocation.

Given recent decreases in available HOME funds at the national level, HUD and Cook County continue to explore methods for consolidating grant operations for the more effective use of available resources. Towards this end, efforts are also currently underway, in cooperation with HUD leadership, to explore adding current non-member jurisdictions to the HOME Consortium, which has the potential to reduce administrative costs and duplication between local municipalities, the County, and HUD. In addition, the addition of these members will permit HUD to count their population in the calculation of the County's annual entitlement allocation potentially increasing available funds.

Given the consolidation of affordable housing programs under a single Deputy Director early in 2012, the County is now poised to effectively evaluate existing program operations and refine its affordable housing strategy as part of the next Consolidated Plan. In August 2013, Cook County submitted a successful grant funding request through the Chicago Metropolitan Agency for Planning (CMAP) for local technical assistance to support the development of the next Consolidated Plan. As this issue intersects all HUD programs, Cook County believes that technical assistance provided via the OneCPD initiative can further assist in this effort.

2. Describe how Federal, State, and local public and private sector resources that are reasonably expected to be available will be used to address identified needs for the period covered by this Action Plan.

Strategy 1.1: Affordable Housing Program

The primary resource Cook County utilizes for affordable housing is HOME funding. Cook County expects to receive \$4,011,248 in HOME funds for Program Year 2013 from HUD. Previously, Cook County furnished corporate dollars to satisfy the regulatory requirement that 25% of HOME funds be matched by non-Federal eligible sources. Given ongoing corporate budget limitations, Cook County will require that future funded projects fulfill match requirements based upon other project resources. Additionally, Cook County will utilize any program income received, derived from loan repayments, to supplement the HOME funding allocation as appropriate. Cook County anticipates the following usage of 2013 HOME funds:

- \$401,124.80 or 10% (maximum allowable) for Cook County HOME program administration
- \$601,687.20 or 15% (minimum required) for projects owned, sponsored, or developed by certified Community Housing Development Organizations (CHDO)
- \$200,000 or 5% for limited down payment assistance

- \$2,808,436 or 70% for additional affordable housing development projects potentially inclusive of acquisition/rehabilitation or new construction, single or multi-family, ownership or rental

Through funding the above activities with HOME and leveraged resources, Cook County will continue to support affordable housing development in its suburban communities.

Additionally, \$441,909 in CDBG funding will be utilized to support an existing CDBG-funded affordable housing development project in Maywood sponsored by the Proviso Leyden Council for Community Action (PLCCA).

Strategy 1.2: Tenant-Based Rental Assistance

HOME funding is not currently utilized for tenant-based rental assistance. However, under the Homelessness Prevention and Rapid Re-Housing component of the new ESG program, short or medium term rental assistance may be provided.

Strategy 1.3: Homeowner Rehabilitation

In addition to HOME funds, Cook County is providing \$70,000 in 2013 funds to support Rebuilding Together, which provides volunteer-based minor rehabilitation services as part of a National Rebuilding Day each April. Each year, a different suburban community is identified as a target area. In 2013, efforts will focus in south suburban Cook County. Please see the Community Development Section and the Appendix for additional information.

Strategy 1.4: Homebuyer Assistance

In Program Year 2013, Cook County will utilize \$200,000 in HOME funds to provide limited down payment assistance in West suburban Cook.

Needs of Public Housing

- 1. Describe the manner in which the plan of the jurisdiction will help address the needs of public housing and activities it will undertake during the next year to encourage public housing residents to become more involved in management and participate in homeownership.***

The Housing Authority of the County of Cook (HACC) is the second largest provider of affordable housing in the State of Illinois. HACC's mission is "To promote adequate and affordable housing, economic opportunity, and a suitable living environment free from discrimination." HACC recently experienced significant changes in its leadership structure including executive management and board membership. While HACC is a distinct entity, the Cook County President retains some legal authority. Recently, the President and the HACC Executive Director announced plans to improve coordination between the respective agencies.

Towards this end, Cook County is exploring opportunities for linkages between HACC programs and County affordable housing and community development dollars. Discussions are ongoing between senior management regarding current and future potential for collaboration and coordination. While HOME funds are restricted as it relates to the modernization of public housing, it is possible to coordinate outreach and marketing activities related to HOME-funded ownership and rental developments. HOME staff maintains an open line of communication with HACC and advises regarding affordable housing opportunities – ownership or rental – which may be of interest to public housing residents or assistance recipients. It is anticipated that a fuller strategy for HACC and Cook County coordination will be outlined in the next Consolidated Plan.

- 2. *If the public housing agency is designated as "troubled" by HUD or otherwise is performing poorly, the jurisdiction shall describe the manner in which it will provide financial or other assistance in improving its operations to remove such designation during the next year.***

HACC is neither designated by HUD as "troubled" nor is otherwise performing poorly. As such, this section is not applicable. However, Cook County continues to promote enhanced interagency coordination and explore collaborative opportunities.

Barriers to Affordable Housing

- 1. *Describe the actions that will take place during the next year to remove barriers to affordable housing.***

Any public policy, including taxes, land use controls, zoning ordinances, building codes, fees and charges, and growth limits, that adversely affect the cost of housing or the incentives to develop affordable housing are considered barriers to affordable housing. The County's current Consolidated Plan describes our strategy to remove or ameliorate negative effects of public policies that serve as barriers to affordable housing.

It is important to note that Cook County is almost entirely composed of home rule jurisdictions and has no legal authority over the land use regulations of incorporated municipalities within its boundaries. Municipalities are empowered to make land use decisions, adopt zoning plans and building codes, and establish fees and charges as deemed appropriate by local officials. As such, Cook County's land use authority is restricted to unincorporated suburban areas, which represent only 6.5% of Cook County's land area and 2% of its population. There are efforts underway to consolidate unincorporated areas with adjacent municipalities to more effectively utilize local resources. However, this will further restrict Cook County's legal authority over related land use policies and procedures.

Notably, Cook County does retain property tax incentive authority via the Cook County Assessor, which can help to alleviate the cost of developing and/or owning housing. Over the last year, the County has made significant progress in consolidating property data and information previously managed by multiple departments. A website aggregating related information including available tax exemptions and incentives has been activated to help clarify property taxation for the general public as well as housing investors.

While the County does not specifically set aside a proportion of HOME funds for preservation activities due to limited resources, it continues to participate in the Preservation Compact currently housed at the Community Investment Corporation (CIC). Although no preservation set-aside exists, recent HOME investments include several projects consisting of acquisition and/or rehabilitation of multi-family rental housing with the aim of preserving existing rental stock.

Cook County will also work closely with the State of Illinois to fulfill the permanent supportive housing provision requirements of the following consent decrees, which derive from the U.S. Supreme Court ruling on *Olmstead v. L.C.* as applicable:

- *Colbert v. Quinn*
- *Ligas v. Quinn*
- *Williams v. Quinn*

Cook County is also continuing to explore options and best practices related to mitigation and elimination of additional barriers to affordable housing including land banking and establishing housing trust funds.

HOME/ American Dream Down payment Initiative (ADDI)

1. Describe other forms of investment not described in § 92.205(b).

With the exception of CHDO operating grants, all HOME funds are provided as a loan with specific loan terms (i.e. deferred, surplus cash, amortizing, interest only, etc.) and rates negotiated on a per-project basis.

2. If the participating jurisdiction (PJ) will use HOME or ADDI funds for homebuyers, it must state the guidelines for resale or recapture, as required in § 92.254 of the HOME rule.

In 2013, Cook County will utilize HOME funds to provide limited down payment assistance. In these cases, Cook County will employ a recapture provision, which will be enforceable based upon executed loan agreements effective throughout the applicable affordability period. The affordability period will commence upon project completion in accordance with current HUD guidance. Presently, Cook County adheres to the minimum affordability periods required under the HOME regulation.

Recapture rights may be invoked based upon the following criteria:

- Failure to occupy the related property as a principal residence
- Voluntary or involuntary sale of the property during the active affordability period

The amount of recapture will vary in accordance with HUD recapture regulations inclusive of the net proceeds formula calculation.

3. If the PJ will use HOME funds to refinance existing debt secured by multifamily housing that is being rehabilitated with HOME funds, it must state its refinancing guidelines required under § 92.206(b). The guidelines shall describe the conditions under which the PJ will refinance existing debt. At a minimum these guidelines must:

- a. **Demonstrate that rehabilitation is the primary eligible activity and ensure that this requirement is met by establishing a minimum level of rehabilitation per unit or a required ratio between rehabilitation and refinancing.**
- b. **Require a review of management practices to demonstrate that disinvestments in the property has not occurred; that the long-term needs of the project can be met; and that the feasibility of serving the targeted population over an extended affordability period can be demonstrated.**
- c. **State whether the new investment is being made to maintain current affordable units, create additional affordable units, or both.**
- d. **Specify the required period of affordability, whether it is the minimum 15 years or longer.**
- e. **Specify whether the investment of HOME funds may be jurisdiction-wide or limited to a specific geographic area, such as a neighborhood identified in a neighborhood revitalization strategy under 24 CFR 91.215(e)(2) or a Federally designated Empowerment Zone or Enterprise Community.**
- f. **State that HOME funds cannot be used to refinance multifamily loans made or insured by any federal program, including CDBG.**

In 2013, Cook County does not intend to utilize HOME funding to refinance existing debt secured by multifamily housing that is being rehabilitated with HOME funds. As such, this section is not applicable. However, Cook County will explore this option in advance of the next Consolidated Plan.

- 4. If the PJ is going to receive American Dream Down payment Initiative (ADDI) funds, please complete the following narratives:**
- a. Describe the planned use of the ADDI funds.**
 - b. Describe the PJ's plan for conducting targeted outreach to residents and tenants of public housing and manufactured housing and to other families assisted by public housing agencies, for the purposes of ensuring that the ADDI funds are used to provide down payment assistance for such residents, tenants, and families.**
 - c. Describe the actions to be taken to ensure the suitability of families receiving ADDI funds to undertake and maintain homeownership, such as provision of housing counseling to homebuyers.**

Cook County has expended all previously awarded American Dream Downpayment Initiative (ADDI) funds. As such, this section is not applicable.

HOMELESS

Specific Homeless Prevention Elements

- 1. Sources of Funds—Identify the private and public resources that the jurisdiction expects to receive during the next year to address homeless needs and to prevent homelessness. These include the McKinney-Vento Homeless Assistance Act programs, other special federal, state and local and private funds targeted to homeless individuals and families with children, especially the chronically homeless, the HUD formula programs, and any publicly-owned land or property. Please describe, briefly, the jurisdiction's plan for the investment and use of funds directed toward homelessness.**

The primary resource Cook County utilizes for homelessness prevention and intervention is ESG. Formerly known as the Emergency Shelters Grant Program, ESG now refers to the Emergency Solutions Grants Program. In 2012, Cook County re-launched ESG in accordance with the Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Act of 2009, which amends and reauthorizes the McKinney-Vento Homeless Assistance Act of 1987 incorporating the following substantial changes:

- A consolidation of HUD's competitive grant programs
- The creation of a Rural Housing Stability Assistance Program
- A change in HUD's definition of homelessness and chronic homelessness
- A simplified match requirement
- An increase in prevention resources
- An increase in the emphasis on performance

ESG funds may be utilized to support several program components as outlined below:

Street Outreach: Funds may cover costs related to essential services for unsheltered persons (including emergency health or mental health care, engagement, case management, and services for special populations).

Emergency Shelter: Funds may be used for renovation of emergency shelter facilities and the operation of those facilities, as well as services for the residents (including case management, child care, education, employment assistance and job training, legal, mental health, substance abuse treatment, transportation, and services for special populations).

Homelessness Prevention and Rapid Re-Housing: Both components fund housing relocation and stabilization services (including rental application fees, security deposits, utility deposits or payments, last month's rent and housing search and placement activities). Funds may also be used for short- or medium-term rental assistance for those who are at-risk of becoming homeless or transitioning to stable housing.

Homeless Management Information Systems (HMIS): Funds may be used to pay the costs for contributing data to the HMIS designated by the Continuum of Care for the area. Eligible activities include computer hardware, software, or equipment, technical support, office space, salaries of operators, staff training costs, participation fees, etc.

Cook County expects to receive \$641,618.00 in ESG funds for Program Year 2013 from HUD. In accordance with HUD rules, 100% of these funds will be matched by funding recipients. Cook County anticipates the following usage of 2013 ESG funds:

- \$48,118 (maximum allowable) for Cook County ESG program administration

Priorities and specific objectives related to addressing homelessness were outlined in the recent Substantial Amendment to the 2011 Annual Action Plan, which described the County's ESG strategy based upon the new regulatory requirements. This strategy will continue in Program Year 2013.

The following projects are being proposed for ESG funding in 2013:

AGENCY	SUBREGION	RECOMMENDATION	SUMMARY
Alliance to End Homelessness in Suburban Cook County	Countywide	\$28,000	HMIS
BEDS Plus Care, Inc.	West	\$35,000	Emergency Shelter, Homeless Prevention, Rapid Re-Housing
Bethel Community Facility	South	\$15,000	Emergency Shelter
Catholic Charities of the Archdiocese of Chicago	Countywide	\$55,000	Homeless Prevention, Rapid Re-Housing
Connections for the Homeless	North	\$26,000	Homeless Prevention, Rapid Re-Housing
Crisis Center for South Suburbia	South	\$42,000	Emergency Shelter, Rapid Re-Housing
Ford Heights Community Service Organization	South	\$10,000	Homeless Prevention
Metropolitan Tenants Organization	South	\$10,000	Homeless Prevention, HMIS
PADS to Hope	North	\$29,000	Emergency Shelter
Pillars Community Services	West	\$12,000	Emergency Shelter
Respond Now	South	\$16,000	Homeless Prevention
South Suburban Council on Homelessness	Countywide	\$19,000	Emergency Shelter, Rapid Re-Housing, Homeless Prevention, HMIS
South Suburban Family Shelter	South	\$22,500	Emergency Shelter, Rapid Re-Housing
South Suburban PADS	South	\$75,000	Street Outreach, Emergency Shelter, Rapid Re-Housing
The Center of Concern	North	\$10,000	Homeless Prevention
The Harbour, Inc.	North	\$18,000	Emergency Shelter, Rapid Re-Housing
Together We Cope	South	\$51,000	Homeless Prevention , Rapid Re-Housing

Vital Bridges Center on Chronic Care of Heartland Outreach, Inc.	West	\$10,000	Emergency Shelter
West Suburban PADS	West	\$80,000	Street Outreach, Emergency Shelter, Rapid Re-Housing, Homeless Prevention
WINGS Program, Inc.	North	\$30,000	Emergency Shelter

In 2013, in addition to ESG funds, Cook County is providing CDBG dollars to support programs and projects, which benefit the homeless or persons at-risk of homelessness as noted below (See Community Development Section).

Cook County funds will be supplemented by HUD Shelter Plus Care (S+C) and Supportive Housing Program (SHP) dollars allocated through the local Continuum of Care. During Program Year 2013, the Continuum will administer remaining funds from 2011 and 2012 totaling \$9,718,283 and \$9,472,930 respectively. Cook County will continue to coordinate with the Continuum of Care, administered by the Alliance to End Homelessness in Suburban Cook County, to develop and implement homeless strategies.

2. Homelessness—In a narrative, describe how the action plan will address the specific objectives of the Strategic Plan and, ultimately, the priority needs identified. Please also identify potential obstacles to completing these action steps.

Please see response above.

3. Chronic homelessness—The jurisdiction must describe the specific planned action steps it will take over the next year aimed at eliminating chronic homelessness by 2013. Again, please identify barriers to achieving this.

Please see response above.

4. Homelessness Prevention—The jurisdiction must describe its planned action steps over the next year to address the individual and families with children at imminent risk of becoming homeless.

Please see response above.

5. Discharge Coordination Policy—Explain planned activities to implement a cohesive, community-wide Discharge Coordination Policy, and how, in the coming year, the community will move toward such a policy.

The Alliance to End Homelessness in Suburban Cook County and members in partnership with Cook County adopted a Discharge Coordination Policy for Suburban Cook County in September of 2007. The policy was enacted to prevent the discharge of persons from publicly funded institutions or systems of care in resulting in homelessness. The Alliance to End Homelessness in Suburban Cook County and its members understand and agree to the following:

Foster Care

The Alliance agrees with the formal protocol developed by the Youth Housing Assistance Program of the Illinois Department of Children and Family Services (DCFS) to provide housing advocacy and cash assistance to young people ages 18 to 21 emancipated from foster care. Up to six months prior to emancipation, a youth who is homeless or at risk of homelessness may apply to the program and if accepted, is assigned a Housing Advocate who helps to find housing, create a budget, and provide linkages for other services. The program offers cash assistance for security deposit and move-in expenses up to \$800 (\$1,200 if parenting, pregnant, or disabled) and a rental subsidy up to \$100 per

month. Youth service providers and the DCFS Local Area Networks also understand and agree to this formal protocol.

Health Care

The Alliance members will continue to work locally with hospital representatives to provide improved housing referral information for patients being discharged who are homeless since the Joint Commission on the Accreditation of Healthcare Organizations (JCAHO) accreditation procedures do not address housing placement specifically as a part of discharge planning.

Mental Health

The Alliance agrees with the formal protocol of the Illinois Department of Human Services, Division of Mental Health (DHS/DMH) known as the "Continuity of Care Agreement" between State-Funded Inpatient Psychiatric Services (SFIPS) sites and community providers. The agreement cites the best practice of not discharging persons into homelessness; that SFIPS sites and provider agencies will work together to find appropriate housing that the individual is willing to accept; that if it is reasonably anticipated that housing will shortly be in place a SFIPS site may delay discharge to prevent homelessness; and if an individual is not housed at discharge, the clinical record must document the reasons.

Corrections

The Alliance agrees with the formal protocol developed by the Placement Resource Unit (PRU) of the Illinois Department of Corrections that provides caseworkers to identify services needed by the ex-offender upon reentry, including housing placement.

Emergency Solution Grants (ESG)

- 1. (States only) Describe the process for awarding grants to State recipients, and a description of how the allocation will be made available to units of local government.***

Cook County is not a State recipient of HUD funds. As such, this section is not applicable.

COMMUNITY DEVELOPMENT

Community Development

- 1. Identify the jurisdiction's priority non-housing community development needs eligible for assistance by CDBG eligibility category specified in the Community Development Needs Table (formerly Table 2B), public facilities, public improvements, public services and economic development.***

A summary of priority non-housing community development needs, goals, and objectives as well as proposed CDBG-funded programs and projects may be found below:

Planning & Administration

The County will utilize \$1,735,983 for administrative purposes.

Strategy 4.6: Neighborhood Planning

Within the aforementioned administrative allocation, in 2013, Cook County will provide \$240,000 in CDBG funds to support planning and administration as noted below.

AGENCY	SUBREGION	RECOMMENDATION	SUMMARY
Alliance to End Homelessness in Suburban Cook County	Countywide	\$50,000	Continuum of Care Planning, Coordination, & Administration
IFF	West	\$40,000	West Cook Housing Collaborative Planning, Coordination, & Administration
South Suburban Mayors and Managers Association	South	\$150,000	Community and Economic Development Planning

Public Services

Strategy 4.2: Housing Services, Strategy 4.3: Social Services

In 2013, Cook County will provide \$1,401,800 in CDBG funds to support housing and social services via 41 distinct awards. These are new programs or a quantifiable increase in an existing program.

AGENCY	SUBREGION	RECOMMENDATION	SUMMARY
All Our Children's Advocacy Center	South	\$43,000	General Services
Aunt Martha's Youth Service Center, Inc.	South	\$20,000	General Services
BEDS Plus Care, Inc.	West	\$12,500	General Services
Bethel Community Facility	South	\$50,000	General Services
Chicago West Community Music Center	West	\$35,000	General Services
Crisis Center for South Suburbia	South	\$27,000	General Services
Ford Heights Community Service Organization	South	\$65,000	General Services
Ford Heights Community Service Organization	South	\$30,000	General Services
Greater Wheeling Area Youth Outreach	North	\$20,000	General Services
HCP of Illinois, Inc.	Countywide	\$45,000	General Services
Interdependent Living Solutions Center	South	\$40,000	General Services
Journeys/The Road Home	North	\$30,000	General Services
Ladder Up	Countywide	\$20,000	General Services
Lawyers Committee for Better Housing	South	\$33,800	General Services
Metropolitan Tenants Organization	South	\$30,000	General Services
Omni Youth Services, Inc.	North	\$30,000	General Services
Omni Youth Services, Inc.	North	\$35,000	General Services
Open Communities	North	\$65,000	General Services
Pillars	South	\$20,000	General Services
Plows Council on Aging	West	\$30,000	General Services
Rebuilding Together of Metro Chicago	South	\$70,000	General Services
Resources for Community Living	North	\$35,000	General Services
Respond Now	South	\$20,000	General Services
Robbins Community Help Agency, Inc.	South	\$40,000	General Services
Sarah's Inn	West	\$15,000	General Services
South Suburban Family Shelter	South	\$40,000	General Services
South Suburban Housing Center	South	\$30,000	General Services
South Suburban Housing Center	South	\$20,000	General Services
South Suburban PADS	South	\$40,000	General Services
The Business Transactions Externship Program	South	\$35,000	General Services
The Catholic Charities of the Archdiocese of Chicago	Countywide	\$20,000	General Services
The Center of Concern	North	\$30,000	General Services
The Harbour, Inc.	North	\$23,000	General Services
The Josselyn Center	North	\$32,500	General Services

The Oak Park Regional Housing Center	West	\$60,000	General Services
The South Suburban Council on Alcoholism and Substance Abuse	South	\$25,000	General Services
Together We Cope	South	\$40,000	General Services
Vital Bridges Center on Chronic Care of Heartland Health Outreach	Countywide	\$20,000	General Services
West Suburban PADS, Inc.	West	\$30,000	General Services
WINGS, Inc.	North	\$25,000	General Services
Women's Business Development Center	South	\$70,000	General Services

Capital Improvements

Strategy 4.1: Facilities and Infrastructure Improvements and Strategy 4.5: Blight Removal

In 2013, Cook County will provide \$4,866,880 in CDBG funds to support 29 capital improvement projects and demolitions as noted below. These are projects, which will provide new or improved public facilities and infrastructure or clear the way for future redevelopment.

AGENCY	SUBREGION	RECOMMEN DATION	SUMMARY
Blue Island Citizens for Persons with Developmental Disabilities, Inc.	South	\$130,000	Public Facility Improvements
City of Calumet City	South	\$140,000	Street Improvements
City of Chicago Heights	South	\$315,000	Street Improvements
City of Countryside	West	\$172,500	Street Improvements
City of Harvey	South	\$250,000	Demolition
City of Hometown	South	\$160,000	Street Improvements
Clearbrook	North	\$100,000	Water/Sewer Improvements
Helping Hand Center	West	\$175,000	Public Facility Improvements
New Hope Center, Inc.	South	\$88,770	Public Facility Improvements
Seguin Services, Inc.	West	\$78,500	Public Facility Improvements
Sertoma Centre, Inc.	South	\$200,000	Public Facility Improvements
Stickney Township	West	\$100,000	Street Improvements
Thornton Township	South	\$100,000	Public Facility Improvements
Village of Bridgeview	West	\$100,000	Street Improvements
Village of Broadview	West	\$212,440	Street Improvements
Village of Burnham	South	\$75,000	Street Improvements
Village of Evergreen Park	South	\$100,000	Public Facility Improvements
Village of Glenwood	South	\$100,000	Water/Sewer Improvements
Village of Hodgkins	West	\$130,000	Street Improvements
Village of Justice	West	\$168,670	Street Improvements
Village of Lansing	South	\$200,000	Street Improvements
Village of Lemont	West	\$250,000	Sidewalk Improvements
Village of Lyons	West	\$220,000	Street Improvements
Village of Maywood	West	\$265,000	Street Improvements
Village of Melrose Park	West	\$156,000	Street Improvements
Village of Riverdale	South	\$280,000	Street Improvements
Village of Schiller Park	West	\$110,000	Street Improvements
Village of Steger	South	\$250,000	Street Improvements
Village of Worth	South	\$240,000	Street Improvements

The County will also allocate \$243,344 to support direct project costs for County staff performance of project management duties for all of the aforementioned projects.

In addition, in 2013, the County will set aside \$500,000 for demolition, which will support local demolition projects and the new land banking efforts as appropriate.

Strategy 4.4: Economic Development

Cook County continues to explore opportunities for utilization of funding for economic development purposes. In 2011, the Department of Planning and Development was reorganized into the Bureau of Economic Development with three additional departments. Fulfillment of senior management positions within the Bureau is nearly complete paving the way for thoughtful discussion and strategizing regarding the most effective and impactful utilization of available funds. Towards this end, it is anticipated that the next Consolidated Plan update will incorporate expanded economic development programs and/or projects. In the interim, in 2013, the County will set-aside \$450,000 for economic development to support infrastructure improvements necessary for business attraction efforts.

- 2. Identify specific long-term and short-term community development objectives (including economic development activities that create jobs), developed in accordance with the statutory goals described in section 24 CFR 91.1 and the primary objective of the CDBG program to provide decent housing and a suitable living environment and expand economic opportunities, principally for low- and moderate-income persons.***

Through the CDBG Program, Cook County works to develop viable communities by providing decent housing and a suitable living environment, and by expanding economic opportunities, principally for low- and moderate-income persons. As a CDBG entitlement grantee, Cook County can carry out a wide range of community development activities directed toward revitalizing neighborhoods, economic development, and providing improved community facilities and services. Both short- and long-term community development objectives are summarized below as well as in the Appendix.

Please note – Cook County currently qualifies as an exception community, whereby it may invest CDBG funds in areas where at least 49.2% (versus the traditional HUD-required 51 percent) of the households earn less than 80 percent of the area median income.

Presently, CDBG funds are not targeted to specific geographic areas but are allocated based upon County-determined need.

Given recent decreases in available CDBG funds at the national level, HUD and Cook County continue to explore methods for consolidating grant operations for the more effective use of available resources. Towards this end, efforts are also currently underway, in cooperation with HUD leadership, to explore adding current non-member jurisdictions to the CDBG Urban County, which has the potential to reduce administrative costs and duplication between local municipalities, the County, and HUD. In addition, the addition of these members will permit HUD to count their population in the calculation of the County's annual entitlement allocation potentially increasing available funds.

Antipoverty Strategy

- 1. Describe the actions that will take place during the next year to reduce the number of poverty level families.***

The prevalence of poverty extends beyond the boundaries of Cook County, presenting as a local, regional, state, and national issue. At its most basic level, poverty indicates a lack of income and resources to fulfill basic human needs relating to health, hunger, education, housing, etc. Poverty may be chronic or episodic. The ongoing economic crisis has exacerbated this issue. A 2010 Brookings Institution report highlighted the “suburbanization of poverty” noting that by 2008, suburbs, specifically those within the largest metropolitan areas, contained the most sizeable and fast-growing population of the poor in the

nation. Midwestern communities appeared to experience the most significant increases in the poverty rate between 2000 and 2008.

While Cook County's capacity to mitigate or eliminate poverty is limited by geography and available resources, the County is committed to supporting programs and projects, which will improve the quality of life for low- and moderate-income families including the impoverished. Recognizing that expanding employment opportunities is a critical strategy in addressing the needs of low-income households Cook County is tackling this issue on multiple fronts.

As a recipient of HUD funding under the CDBG, ESG, and HOME Programs, the Cook County Department of Planning and Development complies with Federal Section 3 rules. Section 3 is a provision of the HUD Act of 1968 that helps foster local economic development, neighborhood economic improvement, and individual self-sufficiency. Section 3 requires that HUD recipients, to the greatest extent feasible, provide job training, employment, and contracting opportunities for low- or very-low- income residents in connection with projects and activities in their neighborhoods. Towards this end, CDBG, ESG, and HOME funding application materials highlight major Federal requirements including Section 3 compliance. CDBG and/or ESG funding applicants are also required to attend post-award workshops, which provide an overview of funding requirements including Section 3. In addition, funding recipients receive written agreements, which outline pertinent Federal rules and regulations as well as related compliance requirements based upon the funding source inclusive of Section 3 provisions. Funding recipient compliance with Section 3 is assessed via desk and on-site monitoring as applicable.

In addition, Cook County Works (formerly known as the President's Office of Employment Training or POET) along with the Cook County Workforce Investment Board (WIB), is committed to assisting the residents of suburban Cook County through the administration of the Federal Workforce Investment Act (WIA) which provides residents with employment training, placement, and educational opportunities. Cook County Works offers important job training services and programs to assist residents in the search for employment and helps them to enhance existing job skills. Labor market and Illinois Skills Match assessment services are also available in the Illinois Employment Training Centers / One Stop Centers.

In 2012, the City of Chicago and Cook County combined three separate Local Workforce Investment Areas (LWIAs) – Chicago, Northern Cook, and Southern Cook – into a single LWIA. Moving from three administrative agencies to one has helped to streamline and standardize processes for clients, businesses, delegate agencies, and training providers. The new entity continues to work diligently to maximize opportunities for residents looking for jobs, reduce administrative costs, and expand job creation throughout the region. The reorganized group also continues to explore opportunities for improved service delivery to residents seeking workforce solutions, elimination of duplicative administrative costs across the LWIA system, and making more funds available to be used in training and development programs.

NON-HOMELESS SPECIAL NEEDS HOUSING

Non-homeless Special Needs (91.220 (c) and (e))

1. Describe the priorities and specific objectives the jurisdiction hopes to achieve for the period covered by the Action Plan.

Non-homeless special needs refers to persons who are not homeless but may require supportive services or housing to obtain, maintain, or improve individual or household stability. Special needs sub-populations include elderly, frail elderly, severely mental ill, developmentally disabled, and physically disabled persons as well as persons suffering from substance abuse or domestic violence or living with

HIV/AIDS. In some cases, these special needs characteristics indicate risk factors for homelessness whereby supportive services and/or housing can prevent initial or recurrent homelessness.

While the CDBG and HOME programs do not specifically set-aside funds for the benefit of non-homeless special needs, the evaluation of related funding applications includes an assessment of the proposed program or project impact and beneficiaries including targeting of Cook County's most vulnerable individuals and families. Several of the programs and/or projects proposed for CDBG funding in 2013 will serve non-homeless special needs as noted in the earlier narrative as well as the Appendix.

Strategy 3.1: Permanent Supportive Housing Development

Under the HOME Program, recent funding applications indicate an increased development interest in permanent supportive housing. While these funding applications remain under review and 2013 HOME funds have not yet been allocated, it is anticipated that a proportion of the funded projects will have a permanent supportive housing component. The Illinois Housing Development Authority (IHDA) which often provides additional financing for Cook County HOME-funded multi-family rental housing developments has also incorporated preferences for permanent supportive housing in their Low-Income Housing Tax Credit (LIHTC) Qualified Allocation Plan (QAP) funding process in accordance with recent legal rulings. It is anticipated that HOME funds will provide gap financing for some of these transactions.

Cook County will also work closely with the State of Illinois to fulfill the permanent supportive housing provision requirements of the following consent decrees, which derive from the U.S. Supreme Court ruling on *Olmstead v. L.C.* as applicable:

- *Colbert v. Quinn*
- *Ligas v. Quinn*
- *Williams v. Quinn*

ESG priorities and specific objectives related to non-homeless special needs persons were outlined in the recent Substantial Amendment to the 2011 Annual Action Plan. Proposed ESG-funded programs and projects, potentially including service to this population, are outlined earlier in this Plan.

2. Describe how Federal, State, and local public and private sector resources that are reasonably expected to be available will be used to address identified needs for the period covered by this Action Plan.

In addition to CDBG, ESG, and HOME funding, the County continues to explore additional funding opportunities to improve the quality of life for Cook County households. Given recent national reductions in formula grant programs, the County recognizes the need to adapt its grant operations to the reality of decreasing funds and increasing demands. Cook County continues to position itself to apply for competitive grants both individually as well as in partnership with local or regional public, private, and non-profit stakeholders.

In 2013, as a joint applicant with the HACC and the City of Chicago Heights, Cook County submitted an application to HUD for a \$500,000 Choice Neighborhoods Planning Grant to support the creation of a comprehensive community, economic, and affordable housing redevelopment strategy plan. This grant application was the result of the collaborative effort of Cook County, HACC, the City of Chicago Heights, and the Chicago Metropolitan Agency for Planning (CMAP). The planning grant, if funded, will target the community surrounding three public housing sites in south suburban Chicago Heights inclusive of low-income families and special needs households. If successful in obtaining funds, this plan will lay the groundwork for a future application for a HUD Choice Neighborhood Implementation Grant. In 2013, Cook County will continue to pursue opportunities for inter-jurisdictional collaboration as well as related funding to supplement existing dollars to serve the neediest Cook County communities and their citizenry.

Housing Opportunities for People with AIDS

1. *Provide a Brief description of the organization, the area of service, the name of the program contacts, and a broad overview of the range/ type of housing activities to be done during the next year.*
2. *Report on the actions taken during the year that addressed the special needs of persons who are not homeless but require supportive housing, and assistance for persons who are homeless.*
3. *Evaluate the progress in meeting its specific objective of providing affordable housing, including a comparison of actual outputs and outcomes to proposed goals and progress made on the other planned actions indicated in the strategic and action plans. The evaluation can address any related program adjustments or future plans.*
4. *Report on annual HOPWA output goals for the number of households assisted during the year in: (1) short-term rent, mortgage and utility payments to avoid homelessness; (2) rental assistance programs; and (3) in housing facilities, such as community residences and SRO dwellings, where funds are used to develop and/or operate these facilities. Include any assessment of client outcomes for achieving housing stability, reduced risks of homelessness and improved access to care.*
5. *Report on the use of committed leveraging from other public and private resources that helped to address needs identified in the plan.*
6. *Provide an analysis of the extent to which HOPWA funds were distributed among different categories of housing needs consistent with the geographic distribution plans identified in its approved Consolidated Plan.*
7. *Describe any barriers (including non-regulatory) encountered, actions in response to barriers, and recommendations for program improvement.*
8. *Please describe the expected trends facing the community in meeting the needs of persons living with HIV/AIDS and provide additional information regarding the administration of services to people with HIV/AIDS.*
9. *Please note any evaluations, studies or other assessments that will be conducted on the local HOPWA program during the next year.*

Cook County does not currently receive HOPWA funding. As such, this section is not applicable.

Specific HOPWA Objectives

1. *Describe how Federal, State, and local public and private sector resources that are reasonably expected to be available will be used to address identified needs for the period covered by the Action Plan.*

Cook County does not currently receive HOPWA funding. As such, this section is not applicable.

Other Narrative

Fair Housing

The Fair Housing Act prohibits discrimination in housing based upon race, color, national origin, religion, sex, familial status, and disability.

As a Federal funding recipient, Cook County is committed to affirmatively furthering fair housing both within and beyond its HUD-funded grant programs.

Broadly, the Cook County Commission on Human Rights (CCCHR) enforces the Cook County Human Rights Ordinance, which was initially adopted on March 16, 1993. This ordinance is designed to protect all people who live and work in Cook County from discrimination and sexual harassment in employment, public accommodations, housing, credit transactions, County services, and County contracting.

The ordinance prohibits these forms of discrimination when they are based upon a person's race, color, sex, age, religion, disability, national origin, ancestry, sexual orientation, marital status, parental status, military discharge status, source of income, housing status, or gender identity. In 2013, this ordinance was modified to include housing choice vouchers as protected class under source of income provisions.

The CCCHR enforces this ordinance by investigating, conciliating, and conducting hearings on complaints of discrimination. In addition, the CCCHR develops and conducts educational programs designed to prevent discrimination before it occurs and to promote better relations among the County's diverse racial, ethnic, religious, cultural, and social groups. The CCCHR shares jurisdiction over complaints with other enforcement agencies including the Chicago Commission on Human Relations, Illinois Department of Human Rights, U.S. Equal Employment Opportunity Commission, and HUD.

Within the Cook County Department of Planning and Development, efforts related to promotion and enforcement of fair housing specific to HUD funded programs have expanded.

Cook County engaged the services of Applied Real Estate Analysis (AREA), Inc. to prepare an Analysis of Impediments to Fair Housing Choice (AIFHC). The updated AIFHC was completed and submitted to HUD in late 2012. As the prior AIFHC was several years old, the updated AIFHC is helping to identify current obstacles as well as lay the framework for strategies for enhanced compliance.

Potential funding applicants are also subject to compliance measures across the various programs. All funding application materials highlight major Federal requirements including fair housing compliance. Applicants for HOME affordable housing development funding are also required to provide an affirmative marketing plan and tenant selection plan (as applicable to rental housing). CDBG and/or ESG funding applicants are also required to attend a pre-application workshop, which provides an overview of funding requirements including fair housing.

Funding recipients receive written agreements, which outline pertinent Federal rules and regulations as well as related compliance requirements based upon the funding source. Funding recipients of HOME affordable housing development provide progress updates on affirmative marketing and tenant selection initiatives as well as occupancy status during the required monitoring process. CDBG and/or ESG funding recipients are also required to attend a post-award workshop whereby contractual agreements are distributed and an overview of major requirements including fair housing compliance is presented.

Fair housing efforts include targeted outreach, education, and compliance specific to CDBG-funded municipal agencies. CDBG municipal funding recipients are also required to provide an updated Fair Housing Action Plan, which must include all of the protective classes outlined in the County's ordinance

and detail current or planned actions to affirmatively further fair housing in their community. Cook County staff continues to monitor municipal fair housing compliance via desk and on-site reviews of documentation, policies, and processes. It is anticipated that given the recent completion of the AIFHC, these compliance efforts will intensify.

The Department of Planning and Development continues to consult with fair housing stakeholders including CCCHR, HUD Offices of Community Planning and Development (CPD) and Fair Housing and Equal Opportunity (FHEO), and the Chicago Area Fair Housing Alliance (CAFHA) as it works diligently to enhance fair housing compliance both internally and Countywide. CAFHA has proven a valuable partner in this process as a consortium of fair housing and advocacy organizations, government agencies, and municipalities committed to the value of fair housing, diversity, and integration.

In 2013, the County will continue to provide financial support for fair housing activities via the provision of \$85,000 in CDBG funding to two regional agencies (Open Communities and South Suburban Housing Center). These funds will be utilized to support fair housing education, outreach, testing, and enforcement activities. The County is also exploring the use of HOME funding to provide additional support for fair housing.

Appendix

FORMS (Will Be Inserted Prior to HUD Submittal)

SF 424 – CDBG
SF 424 – ESG
SF 424 – HOME

Certifications

TABLES (Will Be Inserted Prior to HUD Submittal)

Consolidated Plan Tables

- *Table 1A – Homeless and Special Needs Populations*
- *Table 1C/2C/3A – Strategic Plan*
- *Table 2A – Priority Housing Needs/Investment Plan, Goals, & Activities*
- *Table 2B – Priority Community Development Needs*
- *Table 3C – Consolidated Plan Listing of Projects*

PUBLIC COMMENT (Will Be Inserted Prior After Hearings and Prior to HUD Submittal)

Public Comment Notices

Public Hearing Summary of Comments & Responses

MAPS (Will Be Inserted Prior to HUD Submittal)

Consolidated Plan Jurisdiction Map