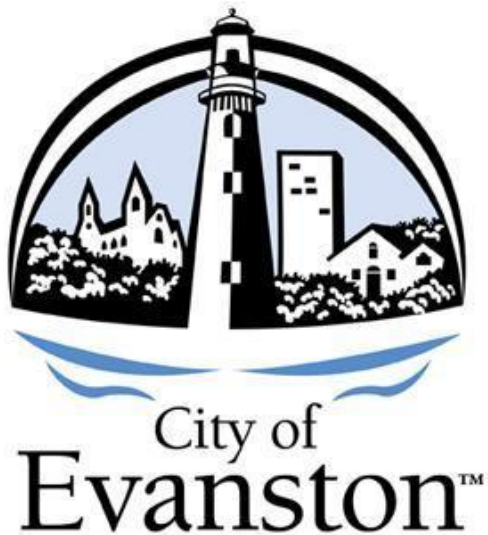


# City of Evanston FY2024 Action Plan

For Public Comment  
November 10, 2023



# Executive Summary

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

### 1. Introduction

Evanston’s 2024 Action Plan implements the fifth and final year of the City’s 2020-2024 Consolidated Plan using CDBG, HOME and ESG funds. Three federal statutory goals to improve living conditions for primarily low- and moderate-income residents are addressed:

- Provide decent housing
- Provide a suitable living environment
- Expand economic opportunities

The City developed its draft Action Plan based on estimated entitlement grant amounts, since the timing of the 2024 federal budget and appropriations is unknown; estimates include \$1,693,000 for CDBG including an estimated grant amount of \$1,550,000 and CDBG PI of \$143,000, \$325,000 for HOME including \$25,000 in HOME PI, and \$145,000 for ESG. The City follows its Citizen Participation Plan (CPP) by posting the draft Action Plan for a 30-day public comment period and holding a public meeting for input on that plan prior to January 1, 2024. This allows the City to charge pre-award costs to our 2024 federal grants.

The 2024 Action Plan will be updated to include actual grant amounts. All available CDBG, HOME and ESG funds will be allocated to Goals in the final 2024 Action Plan for submission to City Council for approval and then to HUD. If this process results in a substantial amendment to the draft 2024 Action Plan, a second 30-day comment period and public meeting for input on the amended plan will be held, following the process outlined in the CPP. A substantial amendment to the Action Plan is defined in the CPP as:

- A change in funding among the Goals used in the development of the plan (AP-20) that is greater than 20% of the total allocated towards the Goal, with the exception of Economic Development.
- The deletion of a Goal included in the plan
- The addition of a Goal not currently included in a plan

Any changes to the Action Plan following receipt of the City’s entitlement grant amounts that increase or decrease funding for a goal by less than 20% shall be considered “non-substantial” and may be approved by the Housing & Community Development Committee, Planning & Development Committee or Social

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Services Committee, as appropriate, based on the program affected. These changes would not trigger a second public comment period.

Changes to the amounts allocated to Goals in the final Action Plan based on actual grant amounts will not constitute a substantial amendment unless they result in a change to funding for any goal by more than 20%, or the addition or deletion of a Goal.

## 2. Summarize the objectives and outcomes identified in the Plan

This could be a restatement of items or a table listed elsewhere in the plan or a reference to another location. It may also contain any essential items from the housing and homeless needs assessment, the housing market analysis or the strategic plan.

**Affordable Housing:** Maintaining and increasing the supply of affordable rental units is one of the City’s highest priorities, but is increasingly difficult due to reductions in funding and rapid increases of real property costs , construction costs, and interest rates. COVID-19 has heightened the need for affordable housing, as it has particularly impacted lower-income residents. Code enforcement in the CDBG Target Area remains an important tool to maintain decent, safe housing and address blight. Properties cited for violations are referred to the Housing Rehab program for assistance. The City is also exploring changes to ordinances, zoning and building codes that may help facilitate affordable rental and ownership strategies.

**Homelessness:** Developing and improving housing for homeless and housing insecure individuals and families is a critical need and part of the City’s recovery plan. Using Entitlement funds, the City will continue to use HOME funding for its Tenant-Based Rental Assistance (TBRA) program. In combination with education, job training and other support, TBRA enables parents to develop self-sufficiency skills, lifting two generations out of poverty. ESG funds continue to be used to help households who are homeless or at high risk of homelessness. With the Home Investment Partnership - American Rescue Plan (HOME-ARP) allocation plan approved, the City has a unique opportunity to expand non-congregate shelter. HOME-ARP will also be utilized to fund Tenant-Based Rental Assistance (TBRA).

**Creating livable communities:** The City uses funding to improve public infrastructure and facilities to revitalize neighborhoods and improve service delivery. In 2024, the City plans to pave two alleys, improve numerous sidewalk paths. The City will also rehabilitate two dilapidated playgrounds—one using CDBG funds and the other using CDBG-CV funds.

**Economic Development:** The City uses resources from its Economic Development Fund, Tax Increment Financing Districts, and ARPA to expand economic development opportunities to small businesses. Grants and loans to for-profit businesses allocated in prior years will continue to be evaluated throughout the year in order to maximize effectiveness of use of all resources to support economic

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development in the City. City staff continues to allocate grant funding to entrepreneurs and small businesses through the storefront modernization, Sustain Evanston and entrepreneurship support program, which are funded through the Economic Development Fund. Sustain Evanston is a new grant focused on helping small businesses upgrade capital equipment or leasehold improvements to a higher level of energy efficiency in 2024. Staff will also explore options for supporting low/moderate income entrepreneurs using CDBG funds.

**Public Services:** The ongoing impacts of the pandemic continue to strain capacity of service providers, particularly those working to provide childcare, case management and support to unhoused residents; most nonprofit organizations are struggling to retain and hire staff and rebuild capacity, school-aged children have increasing mental health needs, and our low/moderate income residents experience challenges accessing needed services. The City’s allocation process incorporates an equity lens and focuses resources on populations experiencing the most challenges to recovery. Funds are used to support and expand case management programs, safety net programs and mental health services. Eligible services include: counseling, food assistance, support for individuals/families who are homeless or at risk of homelessness and grappling with domestic violence, education support for youth, legal services and benefits enrollment services for families and seniors.

### 3. Evaluation of past performance

This is an evaluation of past performance that helped lead the grantee to choose its goals or projects.

Evanston uses funding to address needs and leverage outside resources to achieve goals. In 2023, the new construction of an accessory dwelling unit (ADU) of one (1) single-family home with two bedrooms at 1930 Jackson was completed. This project was led by the Housing Opportunity Development Corporation (HODC), a local affordable development nonprofit. This project received \$190,000 in HOME funds, and \$35,000 in CDBG funds, for a total of \$225,000 in development costs. The project was completed on June 28, 2023 and represents an addition of one (1) affordable HOME unit for the next 20 years. The unit was rented to a household of 2 at 60% AMI in July 2023.

The Housing Rehabilitation program continues to use zero interest deferred loans to help homeowners unable to qualify for market rate financing to maintain decent, sanitary housing. Community Partners for Affordable Housing (CPAH) took over construction management in 2021 and income verification in 2023. Although COVID-19 has impacted this program significantly, 2023 saw the completion of several projects and the rehabilitation of one multifamily low-moderate income rental building. While we are behind our estimated consolidated plan goals, we anticipate an increase in the pace of rehabilitations in 2024.

Evanston continues to focus funding on larger, more impactful projects and programs. Evanston agencies are challenged to meet the increasing demand for services and maintain organizational stability given

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increased demand for services as a result of the pandemic. The City is working closely and collaboratively with agencies to understand needs and provide targeted support. The City continued to fund Connections for the Homeless and the YWCA Evanston-North Shore with ESG to address the needs of individuals and families who are homeless or at high risk of homelessness. ESG-CV funds were used primarily to rehouse homeless individuals and families in non-congregate shelters to protect them from COVID-19.

Capital improvement projects in 2023 remained consistent with previous years. Two alley projects, 1 sidewalk infill project, and 1 sidewalk improvement project were started in 2023 and are expected to complete in 2024. Three Special Alley Assessment projects were completed in October of 2023, applications were sent out to sixty (60) households to provide financial assistance for owner-occupied homes if the household income does not exceed 80% of the area median income.

Through the CARES Act, Evanston received CDBG-CV funds totaling \$1,586,730 and ESG-CV funds totaling \$966,314. Funds have been used to prevent, prepare for and respond to the coronavirus. Use of funds include a small business assistance program for Evanston low/moderate income businesses, a job creation assistance program, a child care assistance program to provide childcare for up to 6 months for low/moderate income households not eligible for other subsidies and experiencing job loss due to COVID-19, funding to provide non congregate shelter to residents experiencing homelessness and to rapidly re-house those households, funding for a youth violence reduction program, and funding for rent, mortgage, and food assistance efforts.

#### **4. Summary of Citizen Participation Process and consultation process**

Summary from citizen participation section of plan.

The Housing and Community Development Committee (HCDC) and the Social Services Committee (SSC) act in an advisory capacity to the City Council on matters that relate to the use of CDBG, CDBG-CV, ESG, HOME, and a limited number of ARPA funded projects. The HCDC is responsible for federal entitlement and local funding for projects and programs that relate to the physical environment and economic development, and SSC is responsible for federal entitlement and local funding for programs and services that provide needed support for underserved populations.

During the COVID-19 pandemic and up until Spring 2023, Evanston City Council meetings were modified based on Governor Pritzker’s order that waived some requirements of the Illinois Open Meetings Act to allow local governments and other public bodies to hold “remote” meetings to help control the spread of COVID-19. Beginning in March 2023, Evanston began holding Housing and Community Development Committee meetings and Social Services Committee meetings in person. Observation of live meetings is available to the public via Zoom. Residents can sign-up to provide public comments in person or in writing via an online form posted on the City’s website, or via 311. In the case of a nationally or locally

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declared disaster as defined by local health officials, the City of Evanston may call entirely virtual meetings to order, under which circumstances virtual public comment would be accepted.

The City of Evanston invites public participation at all stages of the Consolidated Planning process and is committed to making reasonable and timely access to the needs assessment, strategy development and budget recommendation process, particularly for low- and moderate-income persons. The draft Action Plan based on estimated grant amounts will be posted on the City’s website on November 10, 2023, for the 30-day public comment period. Members of the public will have an opportunity to make public comment at the HCDC meeting on November 14 and December 12, 2023. Comments received during the public comment period, including at the December 12 meeting after which the public comment period closes, will be summarized and attached to the Action Plan prior to its submission to HUD, with an explanation of any comments or views that are not accepted and the reasons for which they are not accepted. City Council meetings, at which action to adopt or approve the plan is decided, also offer opportunity for public comment. The Action Plan with updated grant amounts will be presented to City Council for approval when finalized grant amounts have been received, and any additional public comments received will be included.

**5. Summary of public comments**

This could be a brief narrative summary or reference an attached document from the Citizen Participation section of the Con Plan.

Public comments will be included following the close of the public comment period on December 12, 2023.

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

Public comments will be included following the close of the public comment period on December 12, 2023.

**7. Summary**

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**PR-05 Lead & Responsible Agencies – 91.200(b)**

**1. Agency/entity responsible for preparing/administering the Consolidated Plan**

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

Agency Role	Name	Department/Agency
CDBG Administrator	EVANSTON	Community Development
HOME Administrator	EVANSTON	Community Development
ESG Administrator	EVANSTON	Community Development

**Table 1 – Responsible Agencies**

**Narrative (optional)**

The City of Evanston's Housing and Grants division, part of the Community Development Department, is the administrator for the Community Development Block Grant, HOME, and Emergency Solutions Grant programs.

**Consolidated Plan Public Contact Information**

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## **AP-10 Consultation – 91.100, 91.200(b), 91.215(I)**

### **1. Introduction**

The City of Evanston’s Community Development Department consulted with numerous City departments (Public Works, Health & Human Services, Parks and Recreation, Economic Development), as well as the Housing Authority of Cook County, Alliance to End Homelessness in Suburban Cook County Continuum of Care, for input on needs. Additional consultation providers included local and regional nonprofit service providers, housing providers, and community residents. Data are from consulted organizations, the United States Census Bureau and HUD.

Beginning in 2022, the City allocated \$3 million of ARPA funds to be disbursed through a participatory budgeting process. This process was designed and managed by the Participatory Budgeting Steering Committee whose members represented community stakeholders that worked with the community to generate ideas through 12 in person events and online collection. Through the process the City received critical feedback about community needs and possible solutions. Additionally, as part of the PRO Housing Grant application process the City held two hybrid Open House opportunities to address questions and gather feedback about affordable housing in the community. Feedback from these sessions also provided valuable insight into community needs and feedback about City services.

Through these ongoing outreach and engagement efforts, the following priorities were identified for the 2024 Action Plan: affordable housing, shelter for people experiencing homelessness, mental health services, child care, job training and workforce development. Community service providers also report on barriers to receiving services including long wait lists, lack of capacity to assume additional participants and lack of financial resources, and ways to use federal and local funds to connect those in need to services. These collaborative initiatives and outreach efforts will continue to inform uses for local and federal funds, including American Rescue Plan Act (ARPA) and Housing Investment Partnerships - American Rescue Plan (HOME-ARP).

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

The City of Evanston’s Community Development staff regularly coordinates with public and assisted housing providers along with private and governmental health, mental health, and service agencies. . Evanston joined the Housing Authority of Cook County in funding case management services to residents of two affordable housing buildings in Evanston, Jane R. Perlman and Victor Walchirk Apartments, under the new allocation model that provides case management, safety net, and mental health services primarily to low and moderate income residents. Public services providers receive CDBG and local funds to support residents across a broad range of service needs. In 2022, City Council approved \$900,000 in

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ARPA funds to support the capital improvements and programmatic needs for a Living Room to provide urgent and immediate care to community members experiencing mental health crises; the facility is expected to open in 2024. Additionally, staff collaborated with Family Focus - Evanston Our Home on their application to approve a pilot Immigrant Welcome Center funded by ARPA in 2023 and 2024. The Welcome Center was designed to serve immigrants and newcomers to the City of Evanston with civic engagement activities, housing, legal advice, and bilingual resources in Spanish and French.

The Community Development Department regularly attends meetings and other events involving the community and various stakeholders. Staff is aware of any major impacts, such as changes in Cook County and State of Illinois funding that affect vulnerable residents. Engaging with nonprofit service providers on a regular basis fosters an environment where the City works in tandem with the community to achieve better outcomes.

The City of Evanston's Health and Human Services Department developed a community health improvement plan (EPLAN) based on goals identified through the nationally recognized Bay Area Regional Health Inequities Initiative, a coalition of Bay Area Health Departments that created a framework laying the groundwork for defining structural drivers of health. The plan defines the City's health priorities for the next five years as follows: advancing health and racial equity, improving mental and emotional wellbeing, and strengthening climate resilience.

The City's application process for 2024 CDBG Public Services and City Human Service Fund focuses funding on priority needs of the community to address pandemic recovery and encourage collaboration among community partners. Additionally, reporting and monitoring practices are unified to ensure clear programmatic and financial record keeping, compliance, and transparency.

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

The City of Evanston works with the Alliance to End Homelessness in Suburban Cook County (Alliance), the lead agency for the Suburban Cook County Continuum of Care, to address the needs of homeless persons and persons at risk of homelessness in Evanston. Staff attend Alliance lead Coordinated Entry and Board meetings to stay informed; additionally Evanston agencies have staff who are Alliance members including Connections for the Homeless and the YWCA Evanston-North Shore; these representatives participate on the board of directors, HMIS, Coordinated Entry, Prevention and other standing committees. The City of Evanston works closely with service providers, including the YWCA Evanston-Northshore, Connections for the Homeless, and Interfaith Action Evanston, in order to address the needs of chronically homeless individuals and families, families with children, veterans, and unaccompanied youth.

Evanston represents 10.0% of the people identified in the Northern region of the 2023 Point in Time Count for suburban Cook County organized by the Alliance to End Homelessness. Connections and other agencies serving the homeless continue to use the Vulnerability Index (VI-SPDAT) to ensure that chronically homeless individuals and families are part of the Alliance ranking based on vulnerability, so that they have access to permanent supportive housing, rapid re-housing and other interventions. City staff is participating in the Coordinated Entry System process with the Alliance and members of the Continuum. Goals for 2024 include the continued use of the Housing Match and By Name Referrals list managed by the Alliance and developed to prioritize families for housing assistance, and to more successfully provide short term stability case management and shelter diversion services. The Alliance continued matching households eligible for Rapid Re-Housing using HMIS and evaluation of the collective impact approach to assisting those in most need. In FY24, the City hopes to support the cost of the Homelessness Management Information System (HMIS) managed by the Alliance through local funds

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

The City of Evanston recognizes that the demand is greater than available resources to provide essential services, emergency shelter, prevention and re-housing that meet all needs. The City and Alliance agree that individuals and households must be prioritized to ensure that the limited resources available are allocated in the most efficient and appropriate manner. The City of Evanston and the Alliance continue to work on policies and procedures to assess, prioritize and reassess individuals’ and families’ needs for all ESG-funded services, including essential services for those in emergency shelter, rapid re-housing, and homeless prevention activities. InfoNet, the system used by organizations supporting households affected by domestic violence, is integrated with Sage to report 2024 outcomes.

The City of Evanston continues to work with the Alliance and agencies that serve the homeless and people at risk of homelessness, as well as other advocacy organizations. In FY24, the City hopes to designate a portion of its local funds to support the cost of the Homelessness Management Information System (HMIS) managed by the Alliance. Connections for the Homeless, the primary recipient of City of Evanston ESG funds, participates as a member of the Alliance on many levels. Connections staff serve on the HMIS Committee meeting, Coordinated Entry meeting and the monthly prevention meetings; Rapid Re-Housing recipients are identified through the Coordinated Entry process. Participation on the Board and committees help to ensure clear communication of goals and priorities and decrease redundancies as they relate to ESG funding.

As discussed previously, the City prioritizes rapid re-housing; however, the City is working with subrecipients that have housing locators on staff and who receive grants for housing subsidies to

reevaluate this strategy for FY24. Due to high rent costs in Evanston, people eligible for rapid re-housing subsidies are not able to find affordable rental units in Evanston. The average rental rates for all units, studios to three bedroom apartments, exceed the IL HUD Metro Fair Market Rent rates; units at or below these rates are very challenging to locate in Evanston. Case managers and housing locators work to build relationships with landlords. In 2023, rent prices in Evanston increased 1.9% according to local data.

Through the Coordinated Entry process, seniors and veterans are target populations; as the Continuum works to reach functional zero within those populations, homeless youth and homeless families with children are the next focus groups. City staff that administer the General Assistance program provide support to participants who would otherwise become homeless. The City's Human Services Specialist continues to further coordinate housing, health, mental health, and other social services for low- and moderate-income residents and at-risk residents and works closely with community partners including Connections for the Homeless to address housing needs and link clients to a wide variety of additional supportive services. Services can include, but are not limited to food, child and senior care, substance abuse cessation support, as well as mental and physical health services.

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

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**Table 2 – Agencies, groups, organizations who participated**

1	<b>Agency/Group/Organization</b>	HOUSING AUTHORITY OF COOK COUNTY
	<b>Agency/Group/Organization Type</b>	Housing PHA Services - Housing Regional organization
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Public Housing Needs
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Attended planning meetings to develop needs assessment and provided data for relevant sections of the 2024 Action Plan.
2	<b>Agency/Group/Organization</b>	MCGAW YMCA
	<b>Agency/Group/Organization Type</b>	Housing Services - Housing
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Attended planning meetings to develop needs assessment and other related 2024 Action Plan sections.
3	<b>Agency/Group/Organization</b>	YWCA EVANSTON/NORTH SHORE

	<b>Agency/Group/Organization Type</b>	Housing Services - Housing Services-Victims of Domestic Violence Services-homeless
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homeless Needs - Families with children Homelessness Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Attended planning meetings to develop needs assessment and other related 2024 Action Plan sections.
4	<b>Agency/Group/Organization</b>	Meals on Wheels Northeastern Illinois
	<b>Agency/Group/Organization Type</b>	Services-Elderly Persons
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Attended planning meetings to develop needs assessment and other related 2024 Action Plan sections.
5	<b>Agency/Group/Organization</b>	James B. Moran Center for Youth Advocacy
	<b>Agency/Group/Organization Type</b>	Services-Children
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment

	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Attended planning meetings to develop needs assessment and other related 2024 Action Plan sections.
6	<b>Agency/Group/Organization</b>	FAMILY FOCUS
	<b>Agency/Group/Organization Type</b>	Services-Children Services-Education
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Public Housing Needs Market Analysis
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Attended planning meetings to develop needs assessment and other related 2024 Action Plan sections.
7	<b>Agency/Group/Organization</b>	CONNECTIONS FOR THE HOMELESS
	<b>Agency/Group/Organization Type</b>	Housing Services - Housing Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Victims of Domestic Violence Services-homeless

	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Public Housing Needs Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Market Analysis
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Attended planning meetings to develop needs assessment and other related 2024 Action Plan sections.
8	<b>Agency/Group/Organization</b>	ILLINOIS HOUSING DEVELOPMENT AUTHORITY
	<b>Agency/Group/Organization Type</b>	Housing Services - Housing Other government - State
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Consulted to provide data/input for needs assessment
9	<b>Agency/Group/Organization</b>	EVANSTON

	<b>Agency/Group/Organization Type</b>	Housing Services - Housing Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-homeless Services-Health Services-Education Services-Employment Service-Fair Housing Civic Leaders
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Public Housing Needs Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Market Analysis Economic Development Anti-poverty Strategy Lead-based Paint Strategy

	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Various City departments attended planning meetings to develop needs assessment and provided data for relevant 2023 Action Plan sections. Departments included Community Development, Public Works, Parks, Health, and Economic Development.
10	<b>Agency/Group/Organization</b>	Chicago Metropolitan Agency for Planning (CMAP)
	<b>Agency/Group/Organization Type</b>	Regional organization Planning organization
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Market Analysis
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Consulted to provide data/input for needs assessment

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

All major agencies providing a full range of services in and around the City of Evanston were consulted or contacted to request comments/input.

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

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Alliance 2019-2022 Strategic Plan	Alliance to End Homelessness in Suburban Cook County	The Continuum of Care provides the framework and services for many of the activities provided locally to bring assistance and housing to homeless individuals and families.
2022 Annual Comprehensive Housing Plan	Illinois Housing Development Authority	The City of Evanston works with IHDA to ensure continued access to affordable housing for Evanston's low and moderate income residents.
Red and Purple Line Modernization	Chicago Transit Authority	Furthering access to employment opportunities is integral to community development and fostering greater economic growth. The modernization of the Red and Purple Line trains will serve to provide greater accessibility for those with disabilities and the elderly.
On to 2050 Update 2022	Chicago Metropolitan Agency for Planning	CMAP's On to 2050 Plan strives for regional growth in the Chicago area. Evanston is an important component of the Chicago metropolitan region; coordinated growth and development within the region will improve the quality of life for Evanston's residents.

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Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
HomeIllinois: Illinois' Plan to Prevent and End Homelessness July 2022-June 2024	Illinois Interagency Task Force on Homelessness, Community Advisory Council on Homelessness, Illinois Office to Prevent and End Homelessness	This plan focuses on four strategies: building affordable & permanent supportive housing, bolstering the safety net, securing financial stability, and closing the mortality gap for Illinoisians experiencing or at risk of experiencing homelessness. This plan focuses on subpopulations including chronic homelessness and youth, and the racial disparities impacting negative outcomes with the goal of building and supporting initiatives that reduce homelessness and support at-risk households.
2022 EPLAN: Evanston Process for the Local Assessment of Needs	City of Evanston	The City's EPLAN is a five-year strategic plan effective from 2022-2026 to improve the effectiveness and efficiency of the public health system in Evanston. Interventions to improve the health of residents were identified in partnership with public health officials, community leaders, residents, and service providers based on the following four assessments: community themes and strengths, forces of change, local public health system and community health status. 2024 marks the the third year of the EPLAN's five-year health improvement plan.

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Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Evanston Climate Action and Resilience Plan	City of Evanston	The Evanston Climate Action Plan, drafted in 2022, is organized into nine focus areas and outlines more than 200 strategies to make Evanston climate-ready and resilient by 2050. The nine focus areas are: Transportation & Land Use, Energy Efficiency & Buildings, Renewable Energy Resources, Waste Reduction & Recycling, Forestry, Prairie & Carbon Offsets, Food Production & Distribution, Policy & Research, Education & Engagement and Communications & Public Relations.
Evanston Thrives: Retail District Action Plan	City of Evanston	The Evanston Thrives Retail District Action Plan is a market plan to improve the quality and mix of retail, food and entertainment offerings in Evanston's eight business districts. This project was initiated in 2022 through community surveys to assess needs and may complete in 2024. Key projects include storefront modernization in target business districts, placemaking, and support for businesses disproportionately impacted by COVID-19.

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
White House Blueprint for a Renter’s Bill of Rights	White House	In January 2023, the Biden administration described five principles key to protecting renters in the United States, especially as they relate to living in a post-pandemic society. They are: Access to Safe, Quality, Accessible, and Affordable Housing; Clear and Fair Leases; Education, Enforcement, and Enhancement of Rights, The Right to Organize, and Eviction Prevention, Diversion, and Relief. These principles are intended to help guide policy and programs as they relate to fair housing, and many of these recommendations are articulated in draft updates presented to the City’s committees for discussion and action between 2023 and 2024.
Plan for Affordable Housing	City of Evanston	Evanston's Plan for Affordable Housing looks at how to effectively and efficiently meet Evanston residents/ need for housing that is affordable. In addition, the plan looks at the best ways to use federal and local funds to increase affordable housing opportunities in Evanston.

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
2022 HOME-ARP Allocation Plan	City of Evanston	The HOME-ARP Allocation Plan is designed to effectively allocate HOME-ARP funds to provide housing, shelter, and tenant-based rental assistance, and/or supportive services for qualifying populations. This one-time allotment is in addition to the City's HOME entitlement grant.

**Table 3 – Other local / regional / federal planning efforts**

**Narrative (optional)**

All major agencies providing a full range of services in and around the City of Evanston were consulted or contacted to request comments/input. The Community Needs Assessment Survey gathered input about the City’s housing and community development needs and informed the development of the Consolidated Plan; this survey was distributed specifically throughout low/moderate income wards, to residents of four low income senior housing complexes, non-profit organizations and small business owners. The City works in partnership with local nonprofit and community organizations to gather feedback about needs. The City held discussions with targeted populations including nonprofit organizations, seniors, youth, and people participating in public services to gather community input about ways to support fragile populations including people experiencing housing insecurity or homelessness, recent immigrants or households with undocumented family members, and residents who are justice involved. Specific discussions that focused on meeting basic needs, provision of case management and benefits enrollment services, and ways to address mental health occurred at public meetings of the Social Services Committee on September 14 and October 12, 2023. Many community stakeholders, including school social workers and nonprofit service providers, attend monthly SSC meetings regularly and provide feedback on an ongoing basis. The Housing and Community Development Committee will review and discuss priority needs for CDBG funding to inform the development of the final 2024 Action Plan. The opportunity for additional community Input will be provided at the November 14, 2023 meeting as well as the December 12, 2023 meeting.

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**AP-12 Participation – 91.105, 91.200(c)**

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

Many local non-profit organizations and City departments were consulted in the 2020-2024 Consolidated planning process and in the development of the 2024 Action Plan.

The City of Evanston invites public comment on the draft 2024 Action Plan in a 30-day period from November 10 - December 12, 2023, following its Citizen Participation Plan. The public comment period is advertised in the Evanston Review, a newspaper of general circulation, a notice on the homepage of the City’s website, articles in the City’s e-newsletter sent to over 50,000 emails, and on X, formerly Twitter, and Facebook. Non-profits and individuals who have requested information on the City’s Consolidated Plan were emailed at the opening of the public comment period. A link to the draft Action Plan on the City’s website, as well as the location where printed copies of the plan may be reviewed is included in all forms of communication. People could provide feedback via email, X formerly Twitter and Facebook, in hard copy mailed to staff, or in person at the Housing and Community Development Committee Meeting on December 12, 2023. The draft Action Plan included the following language:

Any changes to the Action Plan following receipt of the City's entitlement grant amounts that increase or decrease funding for a goal by less than 20% shall be considered "non-substantial" and may be approved by the Housing and Community Development Committee or Social Services Committee as appropriate, based on the program affected. These changes would not trigger a second public comment period.

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**Citizen Participation Outreach**

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
1	Public Meeting	Non-targeted/broad community	Public input was sought at Nov. 14 2023 and Dec. 12 2023 Housing & Community Development Committee meetings.			<a href="https://cityofevanston.org/actionplan">https://cityofevanston.org/actionplan</a>

2	Newspaper Ad	<p>Minorities</p> <p>Non-targeted/broad community</p>	<p>Display ad in the <b>November 17, 2023</b> issue of the Evanston Review, a newspaper of general circulation, that the draft 2024 Action Plan is available on the City's website beginning November 10, 2023 for the 30-day public comment period. The ad also highlights the meeting of the Housing and Community Development Committee on December 12, 2023, at which input from the public was being sought. The Evanston Review is used because it is the only local print publication.</p>			<p><a href="https://cityofevanston.org/actionplan">https://cityofevanston.org/actionplan</a></p>
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Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
3	Internet Outreach	Non-targeted/broad community	News item on the City's homepage and in an e-newsletter story that the 2024 Action Plan draft was available on the City website beginning November 10, 2023.			<a href="https://cityofevanston.org/actionplan">https://cityofevanston.org/actionplan</a>

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
4	Internet Outreach	Non-targeted/broad community people who are active on social media	Draft 2024 Action Plan was posted on the City website, in a news item on the homepage, in an opt-in email to individuals/organizations about ConPlan-related activities, and posted on the City's Facebook and X (formerly Twitter) accounts for the 30-day public comment period starting November 10, 2023.			<a href="https://cityofevanston.org/actionplan">https://cityofevanston.org/actionplan</a>
5	Bulletin board postings at community centers and the Public Library	Minorities Senior citizens				<a href="https://cityofevanston.org/actionplan">https://cityofevanston.org/actionplan</a>

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
6	Outreach through ward councilmembers at ward meetings and via email	Minorities Ward has significant Black/African-American and Hispanic population				<a href="https://cityofevanston.org/actionplan">https://cityofevanston.org/actionplan</a>

Table 4 – Citizen Participation Outreach

## Expected Resources

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

#### Introduction

The anticipated resources section of the strategic plan describes the City of Evanston’s financial resources for the duration of the 2020-2024 Consolidated Plan. The financial resources listed are not all encompassing but serve to illustrate the City’s ability to use federal and local funding to address the priority needs and goals put forth in this plan. The funds are anticipated to be utilized by various regional and local government entities as well as the service providers which serve Evanston.

Since 2024 award amounts are unknown, anticipated resources are based on estimates and will be updated when final awards are determined.

#### Anticipated Resources

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Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	1,550,000	143,000	0	1,693,000	0	Expected Amount estimated in the ConPlan at an annual grant of \$1,550,000 with \$143,000 in program income annually.
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	300,000	25,000	0	325,000	0	Expected Amount in the ConPlan estimated at an annual grant of \$300,000 with \$25,000 in program income annually.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
ESG	public - federal	Conversion and rehab for transitional housing Financial Assistance Overnight shelter Rapid re-housing (rental assistance) Rental Assistance Services Transitional housing	145,000	0	0	145,000	0	Expected Amount Available for Remainder of ConPlan estimated at an annual grant of \$145,000

**Table 1 - Expected Resources – Priority Table**

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

Federal funding will leverage private, state and local funds by enabling the City of Evanston to serve those with the greatest need at the highest capacity. Additionally, federal funds will serve as gap financing for City programs or service providers applications that require additional funding in order to have their program, project, or service come to fruition. The grant money provided by HUD will allow organizations and the City to successfully meet the needs of the community’s most vulnerable members.

Evanston's ESG funds will be matched on a one to one basis using local funds from the City's Human Services Fund as allocated by the Social Services Committee and other philanthropic efforts driven by agencies receiving ESG, State funds and other resources including in-kind contributions, depending on the agencies funded, to meet the match requirement. HOME matching funds will be from the Affordable Housing Fund, LIHTC, State of IL Housing Trust Fund, and other sources including developers' contributions.

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

The City of Evanston owns a significant amount of property that has the potential to address the needs identified in the plan. This includes parking lots, parks/open space, historic buildings and public facilities on large or assembled parcels and small and/or irregular-shaped parcels. These publicly owned properties are being evaluated for the potential redevelopment of primarily affordable housing, increasing housing choice for low- and moderate-income families, maintaining Evanston’s racial and economic diversity, and leveraging city assets to address Evanston’s housing needs.

**Discussion**

The City of Evanston was recently selected to join the Government Finance Officers Association’s second cohort of “Putting Assets to Work” initiative. This selective and innovative program will lead to an asset map of all City real estate assets and a strategy to better utilize the City of Evanston’s public facilities, help meet the City’s Climate Action and Resilience Plan goals and evaluate the potential for adaptive reuse and new development of affordable housing. Cities in the first cohort, which launched in Summer 2022, are already beginning to realize new revenues and other community benefits, including affordable housing.

On October 23, 2023, Evanston City Council approved a 60-unit 100% affordable development less than 500 feet from the South Boulevard Purple Line Station and Pace Bus 213 stop. The current property consists of four townhomes owned and managed by the Housing Authority of Cook County, and an underutilized parking lot, owned by the City of Evanston. The unit mix is 30 one-bedrooms, 12 two-bedrooms, and 12 three-bedrooms, accommodating households of all sizes. 18 units will have project-based vouchers, 3 will serve households ≤30% AMI from the State Referral Network, 17 will serve households ≤60% AMI and 22 will serve households ≤80% AMI.

The City of Evanston will continue to pursue additional funding, complementing existing resources, to leverage city-owned property to address the needs identified in the plan.

## Annual Goals and Objectives

### AP-20 Annual Goals and Objectives

#### Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Affordable Housing	2020	2024	Affordable Housing	Entire Jurisdiction	Access to Rental Housing Maintain and Improve Rental Housing Maintain and Improve Owner Occupied Housing	CDBG: \$500,000 HOME: \$147,500	Rental units constructed: 0 Rental units rehabilitated: 2 Homeowner Housing Rehabilitated :8 Housing Unit Buildings Demolished: 1 Buildings Housing Code Enforcement/Foreclosed Property Care: 2,000 Household Housing Unit

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
2	Homelessness	2020	2024	Homeless	Entire Jurisdiction	Access to Rental Housing Public Facilities Public Services	HOME: \$147,500 ESG: \$134,125	Tenant-based rental assistance / Rapid Rehousing: 30 Households Assisted Homeless Person Overnight Shelter: 300 Persons Assisted Homelessness Prevention: 5 Persons Assisted Other: 200 Other
3	Creating Livable Communities	2020	2024	Non-Housing Community Development	Entire Jurisdiction	Public Infrastructure Public Facilities	CDBG: \$600,450	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 15,000 Persons Assisted Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit: 1 Households Assisted
5	Public Services	2020	2024	Non-Homeless Special Needs	Entire Jurisdiction	Public Services	CDBG: \$253,950	Public service activities other than Low/Moderate Income Housing Benefit: 900 Persons Assisted

6	Planning and Administration	2020	2024	Planning and Administration of CDBG, HOME & ESG	Entire Jurisdiction	Access to Rental Housing Maintain and Improve Rental Housing Maintain and Improve Owner Occupied Housing Economic Development Public Infrastructure Public Facilities Public Services Homeownership	CDBG: \$338,600 HOME: \$30,000 ESG: \$10,875	Other: 3 Other
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Table 2 – Goals Summary

## Goal Descriptions

1	<b>Goal Name</b>	Affordable Housing
	<b>Goal Description</b>	The City of Evanston aims to increase, maintain, and improve affordable housing. The advanced age of Evanston's housing supply necessitates the need for rehabbing of existing housing. The creation of additional safe, decent, and affordable housing will allow low and moderate income residents the opportunity to remain in the community.
2	<b>Goal Name</b>	Homelessness
	<b>Goal Description</b>	The City of Evanston aims to support services that prevent homelessness and assist those currently experiencing homelessness. These services include but are not limited to street outreach, rapid rehousing, and tenant based rental assistance. Emphasis will be placed on the housing first model .
3	<b>Goal Name</b>	Creating Livable Communities

	<b>Goal Description</b>	Create livable communities through improvements to public facilities and infrastructure. Maintain and improve the quality of Evanston's existing infrastructure and public facilities to ensure residents live in a safe, clean, and decent environment.
<b>5</b>	<b>Goal Name</b>	Public Services
	<b>Goal Description</b>	Improving equitable access to public services for Evanston residents, particularly for historically underserved segments of our population, is a key goal of the City. As seen through input from the community and consultation, there is a high need for public services including, but are not limited to after school and summer youth programs, senior services, and health services.
<b>6</b>	<b>Goal Name</b>	Planning and Administration
	<b>Goal Description</b>	Administration of CDBG, ESG, and HOME.

# Projects

## AP-35 Projects – 91.220(d)

### Introduction

The City has identified the following projects to be implemented in 2024 to achieve the goals in the Consolidated Plan. The Emergency Solutions Grant project will address the needs of homeless individuals, families and households fleeing domestic violence. The Tenant Based Rental Assistance (TBRA) project will address the needs of homeless families with children with direct rental and utilities assistance. The Rental Housing project combines both HOME and CDBG activities, and includes rental construction and rental rehabilitation.

### Projects

#	Project Name
1	ESG-2024
2	Tenant Based Rental Assistance (TBRA)
3	Rental Housing
4	Homeowner Rehabilitation
5	Code Enforcement
6	Public Services
7	Public Facilities & Infrastructure
8	Administration

**Table 3 - Project Information**

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

Evanston continues to work to address the devastating effects of the pandemic. More residents are housing insecure, and individuals and families experience ongoing challenges finding affordable housing, mental health supports, and childcare. COVID has exacerbated the needs prioritized in the City's 2020-2024 Consolidated Plan; the continued prioritization of affordable housing, infrastructure and public facilities projects, and public services. The biggest obstacles to addressing these needs are also due to the pandemic. Rents in Evanston have increased by 1.91% over the past year. Average rent rates are above the HUD Metro Fair Market Rent rates; the average monthly cost for a three bedroom is more than double the allowable Small Area FMR. Housing locators with Connections and the YWCA report that

affordable housing is incredibly challenging to find and fewer households are able to find housing. Evnaston’s rental market continues to pose significant challenges to assisting or supporting our low and moderate income residents. Our nonprofit partners continue to be overwhelmed and understaffed, and there is a shortage of qualified workers for all types of construction and human services jobs. In addition, rapidly rising materials costs result in delays and higher costs on construction projects. As a result, achieving the goals in our Action Plan will continue to be challenging.

## AP-38 Project Summary

### Project Summary Information

1	<b>Project Name</b>	ESG-2024
	<b>Target Area</b>	Entire Jurisdiction
	<b>Goals Supported</b>	Homelessness
	<b>Needs Addressed</b>	Access to Rental Housing Public Facilities Public Services
	<b>Funding</b>	ESG: \$145,000
	<b>Description</b>	Homeless prevention, rapid re-housing, street outreach, overnight shelters, and administration of programs.
	<b>Target Date</b>	9/30/2026
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	There will be 250 beneficiaries of ESG-funded activities, a combination of single persons, couples, households with children and households fleeing from domestic violence.
	<b>Location Description</b>	The activities will take place throughout the City of Evanston.
	<b>Planned Activities</b>	Direct rental assistance, supportive services, shelter operations, and street outreach. Administration of ESG program.
2	<b>Project Name</b>	Tenant Based Rental Assistance (TBRA)
	<b>Target Area</b>	Entire Jurisdiction
	<b>Goals Supported</b>	Homelessness
	<b>Needs Addressed</b>	Access to Rental Housing
	<b>Funding</b>	HOME: \$147,500
	<b>Description</b>	Direct rent and utilities assistance.

	<b>Target Date</b>	12/31/2026
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	It is anticipated that 10-12 households will be assisted through TBRA.
	<b>Location Description</b>	Entire jurisdiction.
	<b>Planned Activities</b>	Rent and utilities assistance for McKinney-Vento families with children under 18 to achieve housing stability and economic independence.
<b>3</b>	<b>Project Name</b>	Rental Housing
	<b>Target Area</b>	CDBG TARGET AREA
	<b>Goals Supported</b>	Affordable Housing
	<b>Needs Addressed</b>	Access to Rental Housing Maintain and Improve Rental Housing
	<b>Funding</b>	CDBG: \$43,000 HOME: \$147,5000
	<b>Description</b>	Rental housing development or rehabilitation.
	<b>Target Date</b>	12/31/2024
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	2 HHs with incomes ≤ 80% AMI
	<b>Location Description</b>	
	<b>Planned Activities</b>	CDBG will be used for rehab of rental units for households with incomes at 80% AMI. HOME funding will be used for new rental housing construction or rehabilitation but these activities will not be completed in 2024.
<b>4</b>	<b>Project Name</b>	Homeowner Rehabilitation
	<b>Target Area</b>	Entire Jurisdiction
	<b>Goals Supported</b>	Affordable Housing
	<b>Needs Addressed</b>	Maintain and Improve Owner Occupied Housing
	<b>Funding</b>	CDBG: \$100,000
	<b>Description</b>	Rehabilitation of owner-occupied homes throughout Evanston, owned by low- and moderate- income populations.
	<b>Target Date</b>	12/31/2024

	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	8 owner-occupied HHs with incomes ≤ 80% AMI
	<b>Location Description</b>	To be determined based on applications received.
	<b>Planned Activities</b>	Substantial rehab. and emergency rehab. of income eligible, owner-occupied housing.
5	<b>Project Name</b>	Code Enforcement
	<b>Target Area</b>	CDBG TARGET AREA
	<b>Goals Supported</b>	Affordable Housing
	<b>Needs Addressed</b>	Maintain and Improve Rental Housing Maintain and Improve Owner Occupied Housing
	<b>Funding</b>	CDBG: \$357,000
	<b>Description</b>	Code enforcement and demolition.
	<b>Target Date</b>	12/31/2024
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Project benefits over 2,000 households living in the CDBG target area.
	<b>Location Description</b>	CDBG Target Area
	<b>Planned Activities</b>	Code enforcement inspections in the CDBG Target Area, including necessary building demolition/clearance as identified by code enforcement inspectors.
6	<b>Project Name</b>	Public Services
	<b>Target Area</b>	Entire Jurisdiction
	<b>Goals Supported</b>	Public Services
	<b>Needs Addressed</b>	Public Services
	<b>Funding</b>	CDBG: \$253,950
	<b>Description</b>	All CDBG public service activities.
	<b>Target Date</b>	12/31/2024
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	900 individuals and families, primarily low/moderate income, will benefit from public services activities.
	<b>Location Description</b>	

	<b>Planned Activities</b>	Public (social) services to low- and moderate- income residents throughout the City of Evanston, particularly for youth programs, senior services, housing services and domestic violence services.
7	<b>Project Name</b>	Public Facilities & Infrastructure
	<b>Target Area</b>	Entire Jurisdiction
	<b>Goals Supported</b>	Creating Livable Communities
	<b>Needs Addressed</b>	Public Facilities
	<b>Funding</b>	CDBG: \$600,450
	<b>Description</b>	Improvements made to public facilities and infrastructure.
	<b>Target Date</b>	12/31/2024
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Approximately 15,000 persons, with the majority of the households benefiting being at or below 80% AMI
	<b>Location Description</b>	Public infrastructure activities are primarily in the CDBG target area in census tracts/block groups with 51%+ low/mod residents. Public facilities are qualified using LMC and may be located anywhere in the city.
	<b>Planned Activities</b>	Repaving of two alleys and sidewalk improvements as well as improvement to playgrounds in CDBG Target areas
8	<b>Project Name</b>	Administration
	<b>Target Area</b>	
	<b>Goals Supported</b>	Planning and Administration
	<b>Needs Addressed</b>	Access to Rental Housing Maintain and Improve Rental Housing Maintain and Improve Owner Occupied Housing Economic Development Public Infrastructure Public Facilities Public Services Homeownership
	<b>Funding</b>	CDBG: \$338,600 HOME: \$30,000
	<b>Description</b>	Administration of CDBG and HOME.
	<b>Target Date</b>	12/31/2024
		<b>Estimate the number and type of families that will</b>

	<b>benefit from the proposed activities</b>	
	<b>Location Description</b>	
	<b>Planned Activities</b>	The planned activities in this project are HOME, and CDBG administration which involve planning and management of grant funded activities and compliance. ESG Administration is in the ESG Project.

## AP-50 Geographic Distribution – 91.220(f)

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

It is estimated that over 90% of all CDBG, HOME and ESG funding will be allocated to benefit persons who are low- and moderate- income. Some projects will be directed across the entire jurisdiction, such as public services and homeowner rehabilitation, whereas others will be directed to the CDBG Target Area (local target area). Some activities, including Code Enforcement, are limited to the CDBG Target Area.

Additionally, it is expected that a significant amount of housing and economic development funds will be focused in the CDBG Target Area.

### Geographic Distribution

Target Area	Percentage of Funds
CDBG TARGET AREA	60
Entire Jurisdiction	40

Table 4 - Geographic Distribution

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## Rationale for the priorities for allocating investments geographically

All activities funded will primarily benefit low- and moderate- income persons or households, either as direct service or financial assistance or by making improvements in areas benefiting primarily low- and moderate- income persons. Some activities, for reasons of qualification and/or desired beneficiaries, will be focused geographically. Some examples of how the City anticipates geographically focused investments are:

Public Infrastructure Improvements – By their nature, they must be in low- and moderate- income Census Tracts/Block Groups, which are primarily located in the CDBG Target Area. Most of the eligible block groups are located in the South and West areas of the City. It is anticipated that funded public infrastructure improvements, including but not limited to alley paving and sidewalk improvements, will be primarily focused in the Target Area.

Code Enforcement – Although Code Enforcement inspectors perform inspections citywide, the CDBG-funded portion of code enforcement will be within the CDBG Target area, which will be paired with other community development activities in the area to address areas of deterioration, maintaining code enforcement and property standards of dwelling units in the area.

Other programs or projects may take place within the CDBG Target Area, but they will not be exclusively so. An example of this is the CDBG Housing Rehab Program, which benefits all low- and moderate- income homeowners, as it will likely have a large investment in the CDBG Target Area, as this area is host to the highest population of low- and moderate- income households.

## Discussion

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# Affordable Housing

## AP-55 Affordable Housing – 91.220(g)

### Introduction

There are a number of housing initiatives identified in the Consolidated Plan that will continue into 2024 to support homeless, non-homeless and special-needs residents who are in need of safe and affordable housing. The programs that impact the most persons or households in 2024 are the tenant-based rental assistance program (TBRA) and the housing rehab program, which serve two very different, yet vital housing needs for the low- and moderate- income residents of Evanston.

<b>One Year Goals for the Number of Households to be Supported</b>	
Homeless	30
Non-Homeless	15
Special-Needs	0
<b>Total</b>	<b>45</b>

**Table 6 - One Year Goals for Affordable Housing by Support Requirement**

<b>One Year Goals for the Number of Households Supported Through</b>	
Rental Assistance	35
The Production of New Units	0
Rehab of Existing Units	10
Acquisition of Existing Units	0
<b>Total</b>	<b>45</b>

**Table 7 - One Year Goals for Affordable Housing by Support Type**

### Discussion

The housing rehabilitation program will continue in 2024, targeting low income home-owners who are unable to make necessary repairs to their homes as well as rental units for low to moderate income tenants.

Additionally, plans were approved in 2023 for the Housing Opportunity Development Corporation to build a 4-story, 33 unit building affordable to households earning 60% or below the area median income,

including 9 units dedicated to Project-Based Voucher (PBV) recipients and 5 units dedicated to Supportive Housing participants. This project will be funded through TIF, ARPA, HOME, and the City of Evanston's local Affordable Housing Fund (AHF). This project will include one staff unit to provide onsite case management and support for vulnerable residents. The proposed 2,327-square-foot ground-floor commercial space (required by zoning) would also provide space for a local minority or female-owned business. The construction timeline is to be determined and the completion date is unknown at this time.

## **AP-60 Public Housing – 91.220(h)**

### **Introduction**

The Housing Authority of Cook County (HACC) serves suburban Cook County, including Evanston. The HACC administers the Housing Choice Voucher program in Evanston and has two buildings for seniors and the disabled, scattered site units for families, as well as seven project-based Section 8 units in Emerson Square.

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

A joint project on South Boulevard just east of Chicago Avenue on a City-owned parking lot that is adjacent to a four unit Housing Authority of Cook County building that has family units (2- and 3-bedrooms) was approved in 2023 and will start construction in 2024, with a likely completion date of 2025. The development will better utilize land in a Transit-Oriented location through the development of a 60-units mixed income rental project affordable to incomes between 30-80% AMI, including 18 units with PBV. Half of the units will be 2 and 3 bedroom units, which are in high demand for families/intergenerational HHs. HACC’s approved housing development with 152 units on the parking lot of the Jane R Perlman Senior Apartments has been delayed due to financing challenges, and interest rate increases. The Housing Authority of Cook County (HACC) had also started initial conversations on a new 6-story development including family housing on the parking lot adjacent to the existing Victor Walchirk Apartments. Due to recent changes in leadership and in the financial landscape, both projects have been put on hold.

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

The HACC has a Resident Advisory Board (RAB) established at one of its sites in Evanston, the Walchirk building. The RAB’s functions include, but are not limited to: assisting residents with access to computers, offering in-house services such as change for laundry, copies, and postage.

HACC’s Resident Service Coordinators work closely with other agencies, including the City’s Levy Center, to help its residents access services and participate in activities throughout the community. The City is also using local funds to provide case management services to residents. The HACC works in partnership with a partner agency to connect residents to community resources and services.

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

The HACC is not designated as troubled.

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## Discussion

The City will continue to actively engage and communicate with HACC to ensure that the needs of residents assisted by that agency are met and services are coordinated with other agencies for efficient and effective use of all community resources.

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

### **Introduction**

The following section discusses the homeless and special needs activities to be undertaken in Evanston during the fiscal year of the 2020-2024 Consolidated Plan.

### **Describe the jurisdictions one-year goals and actions for reducing and ending homelessness including**

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

Connections for the Homeless' homeless outreach program is the largest provider of services to households experiencing homelessness or housing insecurity, including the unsheltered homeless, and addresses a wide range of needs. Case managers develop individualized case plans for each client, assist with obtaining housing and accessing services that may include employment counseling/placement, health services, substance abuse counseling and education. Connections for the Homeless works in partnership with the Alliance to End Homelessness in Suburban Cook County, our Continuum of Care, and local providers including, but not limited to, Interfaith Action, Family Promise, the Men's Residence at the McGaw YWCA, and the YWCA of Evanston/North Shore; all agencies provide housing and case management services to people experiencing homelessness or at risk of homelessness. Connections participates in Coordinated Entry and follows progressive engagement strategies as required.

Connections will continue operations of two drop-in locations (1458 Chicago Avenue and 2121 Dewey Avenue) for people experiencing homelessness in FY2024. Both are open Monday through Friday for morning and afternoon sessions. Interfaith Action offers drop-in services on Saturday mornings. Interfaith Action anticipates providing a similar level of service in 2024. Providing non-congregate shelter enables Connections case managers to identify and engage people experiencing homelessness and to rehouse these vulnerable households using ESG funding. Connections' expanded shelter served 184 participants including 30 children; 1,403 participants of drop-in services received showers, laundry services, access to food and clothing and health services. Connections staff anticipate people will need similar levels of service in 2024.

#### **Addressing the emergency shelter and transitional housing needs of homeless persons**

In recognition of the disproportionate housing, health, and economic impacts of the pandemic on low-income communities and communities of color, and the importance of mitigating these effects, federal funds can be applied to a broad range of services and programs. Developing and improving housing for homeless and housing insecure individuals and families is critical to alleviate the economic impacts of the pandemic and address health and economic outcomes of the pandemic in low-income

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areas. Eligible uses include: supportive housing, rehabilitation and repairs to existing affordable housing, and, perhaps most critically, non-congregate homeless shelter. Through the HOME-ARP allocation plan process, the City has approved the use of HOME-ARP funds for a permanent non-congregate shelter for people experiencing homelessness. Since HOME-ARP is one-time funding, other sources of ongoing support will need to be identified by an applicant to sustain new or expanded services.

Beginning in March 2020, after Gov. Pritzker issued the mandatory shelter in place order due to the pandemic, Connections for the Homeless contracted with the Margarita Inn for 42 rooms used as non-congregate emergency shelter for homeless Evanston residents which has replaced the 18 congregate beds at Hilda’s Place, Connections for the Homeless’ transitional shelter. Connections for the Homeless is in the process of purchasing the Margarita Inn . The YWCA Evanston-North Shore’s 68-bed domestic violence shelter has 23 rooms able to shelter 23 adults and up to 45 children. In FY 2024 Emergency shelter will continue to be provided for 90 days; the agency also offers 12 transitional housing units (12- 24 months) and 16 units of longer-term housing (2-3 years); the agency anticipates services to 670 survivors annually. Both agencies are supported by the City with ESG, CDBG, CDBG-CV, and local funds.

Finally, Interfaith Action of Evanston continues to operate the emergency overnight shelter during winter months and the hospitality center in the mornings. Interfaith works closely with Connections to ensure guests have access to case management and additional resources and services that Connections provides. Interfaith Action is supported through CDBG.

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

The City will use 2023 and 2024 ESG funds for re-housing as its primary strategy to reduce the amount of time that individuals and families (chronically homeless, families with children, veterans and their families, and unaccompanied youth) experience homelessness.

ESG funds for homeless prevention address preventing individuals and families who were recently homeless from becoming homeless again. ESG-supported programs are required to provide case management and supportive services, and to connect clients with mainstream resources to increase their likelihood of achieving long-term housing stability. ESG recipients can receive follow-up case management services after termination of assistance as required and receive additional support as needed to prevent households from becoming homeless again, and determine program outcomes.

The City will use HOME funds for Tenant Based Rental Assistance to address both the shortage of available affordable units, particularly for larger households, and the inability of some households to pay rents generally considered affordable due to the lack of ability to earn a living wage. Households with children under the age of 18 enrolled in Evanston schools that are doubled-up/unstably housed (category 2 in the definition of homeless) are a priority population for the program.

Heads of households in the TBRA program will receive education/job training in addition to rent assistance to develop the ability to earn living wages to maintain market rate housing independent of a subsidy. The City will work with Connections for the Homeless to enroll an estimated 10 to 12 new households in 2024 and provide ongoing, needed support for vulnerable families enrolled in the prior year.

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

ESG Prevention funds will be used as described above to help households with incomes below 30% of area median income avoid becoming homeless, and re-housing funds will be used to help low-income households achieve housing stability in 2024; Connections for the Homeless, the City's sole subrecipient for Prevention and Rapid Rehousing funds, works in partnership with the Alliance to End Homelessness in Suburban Cook, to follow the CoC established Coordinated Entry process. All agencies receiving ESG funds are required to connect households to mainstream benefits as available and appropriate for their needs. In addition, the City's Social Services Committee evaluates the effectiveness of case management services and safety net services of agencies applying for funds as a criterion of funding. Public Service applications are reviewed by the Social Services Committee prior to City Council approval. Funds are used to support or increase capacity for agencies providing holistic case management services to connect participants to public benefits and community supports that help them achieve self-sufficiency as part of the City's equity model to provide support for low/moderate income households and households that have been historically underrepresented.

## Discussion

The City of Evanston continues to collaborate with the Alliance to End Homelessness in Suburban Cook County to address the needs of homeless individuals and families in Evanston. Additionally, the City continues providing General Assistance/Emergency Assistance funds to help residents who are not eligible for any other state or federal financial assistance programs remain housed and recover from documented emergencies. Both funds can be used for the following: rental payment assistance,

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mortgage payment assistance, condominium assessment fee assistance, utility payments, child care, and food.

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

### Introduction:

Evanston’s housing market remains extremely competitive due to low housing inventory, aging housing structures, and the inability for income to keep pace with the rising costs of rent and homeownership. Land use policies and complex permitting processes have also resulted in a failure to produce the diversity of housing typologies necessary to support the increasingly modern community Evanston continues to become. The high demand and low supply of both rentership and homeownership opportunities in Evanston has contributed to higher than usual year-over-year rent increases and a disproportionately high median home values that have deepened the housing affordability crisis. Additionally, high construction and renovations costs remain an issue.

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

The City of Evanston amended its Inclusionary Housing Ordinance (IHO) in 2018, with an effective date of January 1, 2019, revising the fees in-lieu to incentivize on-site units. Since then, the new policy the number of on-site affordable units with each new development has picked up pace compared with previous years. 53 affordable on-site units were created between 2020 and 2022, 9 in 2023, and an additional 21 units will be available for leasing in 2024. Additional units, including potential homeownership units are expected to be approved in 2024.

A review of the IHO to assess the effectiveness of the IHO and its impact on the current real estate market was started in 2023 and will continue into 2024 through the Housing & Community Development Committee. This review will provide an opportunity to modify the IHO’s requirements to improve its impact and better incentivize the targeted results. Additionally, updates to the 3-unrelated rule and rental registration are in discussion and are likely to continue in 2024 to implement more equitable policies for renters as well as remove barriers to rentals for non-traditional households.

The most impactful action planned in 2024 is the assessment and analysis of Evanston’s key community features to determine updates to be made to Evanston’s Comprehensive Plan and Zoning code. These updates will take place in 2024 with adoption anticipated in April 2025. This will be the city’s first Comprehensive Plan update since the year 2000 and zoning code rewrite since 1993. These updates expect to simplify regulations, streamline processes, eliminate exclusionary practices that result in systemic inequities.

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**Discussion:**

Housing cost burden, or the mismatch between housing costs and income, is the greatest housing issue impacting Evanston’s residents. Although Evanston’s median monthly rent of \$1,526 is less than 30% of monthly income to an Evanston household earning the City’s median annual income of \$87,345, this masks the housing cost burden of low- and moderate-income households. Over 68% of Evanston renter households (5,842 households) and over 60% of homeowner households earning <\$75,000 are housing cost burdened. These housing cost burdens disproportionately impact non-White alone households, whose median incomes are well below the citywide median. With a median home value of \$410,600, and less than 15% of owner-occupied units valued at or below \$200,000, it is particularly difficult for low- or moderate-income households to consider homeownership within Evanston. Based on current interest rates, a 20% down payment (no PMI), no HOA fees, and average Cook County property taxes, purchasing the median Evanston home would cost \$3,417 in monthly mortgage payments, affordable only to households earning over \$137,000 annually.

Evanston’s lack of diversity in housing developments and aging housing stock worsen Evanston’s housing affordability. About 37% of Evanston’s housing stock are attached and detached single-family homes. About 38% are multi-family buildings of 10 or more units. The remaining ~25% of units are 2-9 unit residential buildings. Over 50% of housing units were built before 1950 and the current zoning code makes it difficult to build housing typologies that are more affordable to low- and moderate-income households. Meanwhile, Evanston’s aging housing stock is expensive to maintain and rehabilitate to age-in-place, especially for low- and moderate-income residents. Additionally, high property costs, particularly in predominantly single family neighborhoods with larger required lot sizes and transit oriented corridors have resulted in the concentration of affordable housing in the west and south Evanston neighborhoods rather than being dispersed throughout the community.

Another barrier to affordable housing within Evanston is the shortage of decent, affordable, and accessible housing for persons with disabilities. The supply of affordable housing accessible to persons with physical disabilities is due in large part to the age of housing stock, most of which was built before the Americans with Disabilities Act was passed. Much of the City's older homes are difficult to retrofit for accessibility because they are multi-story units with stairs. This is true of smaller two-to-four flats as well as larger three- or four-story walk-ups built in the 1930s and 1940s. Some facilities designed to accommodate people with mobility disabilities exist in Evanston, including the two buildings HACC updated per its Section 504 Transition Plan. Additional units are being made available through the IHO within new market rate developments. However, stakeholders and HACC waiting list data suggest that the unmet need for affordable accessible housing will continue to be significant.

The City's occupancy standards for rental housing that limits the number of unrelated persons residing in a single housing unit can be an additional barrier to affordable housing, particularly for non-traditional households.

The City of Evanston wants to ensure that it is the most livable city for all of its residents. In order to most effectively address the housing needs of its low-, moderate-, and middle-income residents, and maintain its economic and racial diversity, priority for income restricted rental and ownership units will be given to eligible households that live in Evanston or have a household member that works in Evanston wherever possible and in compliance with fair housing. The City has developed a centralized wait list for income restricted units developed through the Inclusionary Housing Ordinance to facilitate access to affordable housing for its residents. Properties with income restricted units not developed through the IHO may choose to get referrals from this centralized wait list to expand its effectiveness. Rental assistance programs funded with HOME, ESG and local funds will be used in Evanston to the greatest extent feasible to minimize displacement of lower income residents.

## AP-85 Other Actions – 91.220(k)

### Introduction:

The following are actions to be undertaken by the City of Evanston 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 following are priority needs in 2024:

- Housing for Evanston residents at risk of, currently experiencing, and/or living in non-congregate shelter homelessness
- Workforce Development; including job counseling, placement and support for low and moderate income residents
- Care for preschool, elementary, and middle school children; particularly for parents/families with essential/front-line jobs that do not have an adult at home to care for children, including school age children learning remotely, and older family members
- Mental health needs including individual and group counseling services, psychiatric services and medication management, and services targeted to youth and BIPOC populations

The City will continue to use ESG prevention funds and rapid re-housing funds in partnership with our CoC, the Alliance, to support households experiencing homelessness or who are housing insecure. ESG Funds will also provide support for street outreach and shelter operations; CDBG and local funds support shelter operations, emergency shelter during winter months and outreach efforts. All ESG-CV and all CDBG-CV funds allocated to homeless shelter operation, food assistance and rent assistance have been allocated and expended. City staff will continue working with local providers and the Alliance to End Homelessness in Suburban Cook County, the City's CoC.

The City restructured its allocation process for public service funds to incorporate a resident-focused delivery of needed services; funds are allocated by the Social Services Committee for services including holistic case management, mental health services, and safety net services that meet basic needs including food, child care, youth programs and legal services. The restructure aligns with the City goal of eliminating systemic inequities in service delivery, particularly for POC and to facilitate recovery from the pandemic taking into account the disparate impact on BIPOC populations.

Additionally, the City approved ARPA funding for the construction of a mental health living room that would provide community-based mental health services that could be accessed by people experiencing a mental health crisis as an alternative to 911 or hospitalization. Living Rooms provide a safe space for

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people in crisis and are a cost-effective alternative source for peer counselors, counselors to teach de-escalation skills and provide referrals for housing, healthcare and other necessities. This project is in partnership with Presence Saint Francis Hospital and Turning Point Behavioral Health Care Center.

The City continues to assess the impacts of the pandemic; staff works closely with service providers to assess the needs of the populations they serve. Vital public service needs include individual/group counseling, workforce development/job training, and child care for households impacted by COVID-19. Evanston's goal is to provide support for the most at-risk populations as outlined above to provide needed services directly to identified populations rather than funding traditionally funded programs that meet a wider variety of needs.

### **Actions planned to foster and maintain affordable housing**

Evanston's update to its Residential Landlord Tenant Ordinance (RLTO) will help to create predictability for landlords through the adoption of more consistent regulations throughout the region and stabilize tenants by reducing turnover and bolstering rights. Evanston continues to partner with Metropolitan Tenants Organization (MTO) and Lawyers' Committee for Better Housing (LCBH) to strengthen landlord/tenant relations, especially low-income households, increase awareness of landlord-tenant rights and responsibilities, and provide representation and other legal relief to low-income residents as it relates to housing stability. LCBH participates in the Cook County Legal Aid program, providing legal assistance to residents with eviction, retaliation, illegal lockouts, and bankruptcy issues. This contract is up for renewal in December 2023.

The update to the Inclusionary Housing Ordinance will continue to increase opportunities for low-mod households to live in income-restricted units in high-opportunity areas that would otherwise be unaffordable to them. The City of Evanston will continue to partner with Community Partners for Affordable Housing (CPAH) to manage the waitlist for income-restricted Inclusionary Housing Ordinance units and for affordable homeownership programs in Evanston. CPAH's contract is up for renewal for 2024 following its sixth year partnering with the City of Evanston to place low-, moderate-, and middle-income families into affordable housing. Twenty-one new inclusionary housing units are expected to become available in 2024 to eligible households at or below 60% AMI throughout the community within private market rate developments. This is additional to the 72 existing units.

The City of Evanston's locally funded Affordable Housing Fund, develops and rehab affordable housing for persons of up to 120% of the area median income. The fund also supplements CDBG and HOME funds to develop and maintain much-needed affordable housing throughout Evanston. For the past four years, the City Council has named expanding affordable housing options as one of its annual goals. The City Council approved the creation of new detached or internal accessory dwelling units, zoning changed to allow for smaller lots and the use of City owned land for affordable housing development.

The Five-Fifths TIF which is intended to maintain the cultural, socioeconomic, and racial diversity in Evanston’s Fifth Ward will also continue to provide a sustainable source of funds to help long-time property owners maintain and upgrade housing.

With a focus on sustainability, climate resilience, and energy efficiency, the ARPA funded pilot project “Green Homes Evanston” (formerly One Stop Shop Retrofit) is expected to start rehabilitation projects in 2024 and should provide an opportunity to expand housing rehabilitations and the potential to combine various sources of funding for more impact, while keeping low- and moderate-income householders in their homes.

City Council also approved a 60-unit mixed-income development serving households earning 30%-80% of the area median income and will be funded in part by the Low-Income Housing Tax Credit (LIHTC), through a collaboration between the City of Evanston and the Housing Authority of Cook County. Construction on the project is expected to begin in 2024.

Two additional projects funded by ARPA and identified through the participatory budgeting process will be implemented starting in 2024: housing subsidies to reduce rental rates of owner-occupied multi-family properties to promote housing affordability across Evanston and housing services for Evanston residents with refugee status.

**Actions planned to reduce lead-based paint hazards**

The City’s Health & Human Services Department receives the TORRENS grant from Cook County Department of Public Health which offers financial assistance for low income property owners. The grant will provide up to \$300,000 and ends on November 30, 2024. They also receive a yearly grant of \$24,900 from the Illinois Department of Public Health to aid in paying for testing and inspection supplies.

The Evanston Health & Human Services Department is partnering with the Cook County Department of Public Health to provide lead hazard removal at NO COST to the resident or owner. This opportunity is made possible by a four year grant from HUD. The income requirements of this grant can be applied to tenants of a rental property.

In addition to responding to cases of childhood lead poisoning the Evanston HHS also provides preventative lead risk assessments for Evanston residents as long as there is either a child age 6 or less or a pregnant woman is living at the property. This is a proactive service offered to the residents of Evanston to help them become aware of the possible lead hazards in their home along with preventing their child from becoming lead poisoned.

**Actions planned to reduce the number of poverty-level families**

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There are a variety of initiatives the City of Evanston facilitates to reduce the The City approaches reducing the poverty level of families through rental subsidies; including Rapid-Rehousing program, Tenant Based Rental Assistance (TBRA); through homelessness prevention and outreach programs, emergency shelter, workforce development programs, economic development initiatives, and basic income relief.

The City's Workforce Development Division supports underserved populations, particularly residents between the ages of 18 and 30 years old, in connecting participants to careers in healthcare, retirement and senior living, and apprenticeship programs in HVAC, carpentry, masonry, concrete, and more. In addition, the City's Lead Service Line Replacement program, initiated in 2022 with ARPA funds, also has an apprenticeship program that provides on the job training with a living wage for entry-level manual labor workforce development. The City also supports job seekers with an online social platform that connects job seekers with others with similar skill sets and interests and current employment opportunities based on Evanston WorkforceCONNECT, a professional social platform to help people build a professional network, market skills and connect with employment opportunities.

The Five-Fifths TIF, which is intended to maintain the cultural, socioeconomic, and racial diversity in Evanston's Fifth Ward, is expected to continue improving the City's economy through the expansion of affordable housing and creating job training/workforce development programs. It can be used for targeted upgrades to infrastructure, amenities, and business districts.

Finally, 2024 will mark the city's fifth year of facilitating the Community Member Relief fund, which provides emergency financial support for residents who are undocumented and not eligible for emergency or general assistance. Last year, the City provided a total of \$26,054.15 in relief to 15 community members. 2024's budget of \$50,000 is set to almost double the impact in 2024.

### **Actions planned to develop institutional structure**

City staff works throughout the year to increase institutional structure, both within the City and in consultation with our partner agencies. This is accomplished through providing technical assistance on federal grant management requirements, such as providing information about Davis-Bacon requirements, financial management and other grant management procedures. Staff maintains contact with partner agencies throughout the year, offering referrals for funding and training opportunities where appropriate.

All policies and procedures related to internal grant management procedures are being reviewed, and will be updated when areas of opportunity for efficiency and collaboration are identified. Additionally, investment is made in technology that assists departments within the City to more effectively and efficiently manage grant programs; an example is CDM, which is the City's management software program for all housing-related projects that require project or loan management and ongoing

compliance. Staff also attends relevant training and conferences, where available, on all aspects of grant and project management.

Additionally, the City of Evanston is conducting an overhaul of Civic Platform and its 311 system to improve efficiency and communications systems; and is reviewing its civic engagement strategies to improve inclusion and equity in public participation processes. Furthermore, the Community Development Department is a member of various associations such as the National Community Development Association( NCDCA) , National League of Cities (NLC), and the Government Alliance on Race and Equity (GARE).

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

The City is heavily invested in collaborations throughout the community, as evidenced by the multiple roundtable discussions held with City staff and service providers to assess community needs and recovery efforts that provide equitable support to vulnerable populations. The City has successfully paired with multiple health service providers, such as Erie Family Health Center, which provides bi-lingual medical, dental and mental health services to the community, regardless of the person's ability to pay and AMITA Health Saint Francis Hospital Evanston. These critical partnerships have increased the community's access to quality, affordable healthcare. Family Focus, James B. Moran Center for Youth Advocacy, Connections for the Homeless, and Youth & Opportunity United provide case management services to vulnerable populations including justice impacted and/or homeless youth, and DCFS involved families. The City also supports North Shore Senior Center providing case management and benefits enrollment services to seniors, and the Housing Authority of Cook County to expand needed case management and mental health services to low-income elderly and residents with disabilities.

### **Discussion:**

The City's Community Development Department, in collaboration with the Economic Development Department, is committed to making Evanston the most livable city in America, and this commitment is evident in our community partnerships and investment in economic and neighborhood development. The actions identified above will further this initiative and will increase opportunities for low- and moderate- income residents to receive necessary services and have access to affordable housing options.

The City of Evanston will be conducting an Assessment of Fair Housing (AFH) with the Cook County Home Consortium members. Part of this process include coordination with other governmental agencies and nonprofit organizations, reviewing goals to research and reduce impediments to fair housing. The group is continuing to incorporate new guidance and hopes to complete the assessment in 2024.

City staff will also work with contractors to ensure CDBG and HOME-ARP projects comply with the Build America, Buy America Act (BABA) as detailed in the Infrastructure Investment and Jobs Act, Pub. L.

117-58 and 2 CFR 184.

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## Program Specific Requirements

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

**Introduction:**

Housing and Grants staff is 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, including the Omni Circular, Davis-Bacon and Related Acts, Uniform Relocation Act, and Section 3, are met.

#### Community Development Block Grant Program (CDBG) Reference 24 CFR 91.220(I)(1)

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

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

**Other CDBG Requirements**

1. The amount of urgent need activities		0
2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan.		70.00%

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

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

Additional forms of investment in the construction of new affordable rental housing includes Low Income Housing Tax Credits and City of Evanston Affordable Housing Funds that will be invested in HOME eligible housing projects during 2024.

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

The City does not plan to use HOME funds for homebuyer activities in 2024; HOME resources will be focused on rental housing needs, primarily of households whose incomes do not exceed 60% of the area median income.

If homebuyer activities were to be undertaken, the City would use recapture provisions to maintain long-term affordability for ownership projects with direct homebuyer subsidies in the form of down payment or closing cost assistance, or purchase price reductions (soft second mortgages) used to

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maintain compliance. The length of the affordability period would be based on the amount of HOME subsidy and forgiven on a pro-rata basis as long as the property remains the owner's primary residence. The balance is due only if the property is sold or ceases to be the buyer's primary residence before the end of the affordability period, subject to net proceeds.

The City's recapture terms are based on the minimum HOME requirements.

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

If homebuyer activities were undertaken, the City would record a Junior Mortgage and Land Use Regulatory Agreement (LURA) deed restriction that acts as the Affordable Housing Restriction to ensure that the HOME funds are subject to recapture if the unit does remain the principal residence of the purchaser for the length of the affordability period. Buyers would also sign an Agreement with the City describing the HOME subsidy. The City considers requests to subordinate its junior mortgage in a refinance of the first mortgage as long as the borrower does not receive any cash back as part of the refinancing and the new loan amount does not exceed the original first mortgage with allowances for generally accepted financing costs. The City will not subordinate to a negative amortization loan or any loan it deems to be predatory.

Loan principal would be forgiven:

- At the rate of 1/60th per month for a 5 year term
  - At the rate of 1/120th per month for a 10 year term
  - At the rate of 1/180th per month for a 15 year term
4. Plans for using HOME funds to refinance existing debt secured by multifamily housing that is rehabilitated with HOME funds along with a description of the refinancing guidelines required that will be used under 24 CFR 92.206(b), are as follows:

HOME funds may be used to refinance existing debt secured on multi-family rehab projects, excluding projects whose debt is made or insured by any federal program. The City may consider using HOME funds to refinance existing debt in specific situations using the following guidelines:

- To ensure that rehabilitation is the primary eligible activity, HOME funds may be used only to refinance the rehabilitation portion of a loan and up to 40% of acquisition financing.
- The property must be inspected to ensure disinvestment has not occurred.
- The Project pro forma will be reviewed to ensure that the long-term needs of the project can be met and that serving the targeted population is feasible.
- It must be stated whether the new investment is being made to maintain current affordable units,

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create additional affordable units, or both.

- Whether the length of the affordability will extend beyond the minimum 15 years will be determined and specified before HOME funds are invested.
- The project must be located in Evanston.
- HOME funds cannot be used to refinance multifamily loans made or insured by any federal program, including CDBG.

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

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

ESG Policies and Procedures are attached.

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

The City of Evanston is part of the Suburban Cook County Continuum of Care. The Alliance to End Homelessness in Suburban Cook County, lead agency for the Cook County CoC, has a common intake form and data entry standards for HMIS. The Alliance includes members of the Continuum of Care in a process to refine and improve its coordinated intake system. The process coordinates intake from multiple access points, including phone/internet, walk-ins at agencies, shelters and street outreach and uses a pre-screen to assign individual cases to:

- Diversion/Prevention with case management only
- Prevention funding and case management
- Referral to parallel systems such as Veterans and DV programs
- Progressive engagement strategies to ensure participants receive needed subsidies and services
- Short-term intervention combining case management and shelter for homeless
- Medium-term intervention combining case management with bridge housing (rapid re-housing), Safe Haven or transitional housing
- Long-term intervention combining case management with permanent supportive housing or rapid re-housing or transitional housing, as available.

All cases qualified as needing short-, medium, or long-term interventions would use the VI-SPDAT and be ranked for housing based on vulnerability.

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

City Staff develops recommendations for ESG allocations that are reviewed by the Social Services Committee (SSC). Staff then takes recommendations to the City Council for final review and approval. All recommendations are discussed at public meetings, agendas for all meetings are published in advance, as required by the Open Meetings Act.

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

The City of Evanston is part of the Alliance to End Homelessness in Suburban Cook County and the Suburban Cook County Continuum of Care. The Alliance has homeless or formerly homeless persons on its Board of Directors and in its working groups. Connections for the Homeless, an ESG subrecipient and member of the Alliance, also has people with lived experience on its board of directors and as part of its advocacy program, Joining Forces.

5. Describe performance standards for evaluating ESG.

Performance standards are as follows:

- Engagement rate: the percent of persons exiting shelter where the destination is known
- Percent of persons exiting shelter who use 30 shelter-nights or fewer
- Percent of persons graduated to permanent housing

**City of Evanston**  
**Emergency Solutions Grant Program (ESG)**  
**Policies and Procedures Manual**

**I. Overview**

The Emergency Shelter Grant program provides funding for a broad range of activities that addresses the needs of people who are homeless or at risk of homelessness. ESG was one of 20 programs established by the Stewart B. McKinney Vento Homeless Act of 1987 (P.L. 100-77), the Nation's first comprehensive response to homelessness. The City of Evanston has received ESG funds since 1989.

In 2009, Congress approved the Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Act to better coordinate resources and address the growing problem of homelessness. The implementation of HEARTH includes changing the Emergency Shelter Grant to the Emergency Solutions Grant to include eligible activities based on the ARRA-funded Homelessness Prevention and Rapid Re-housing Program (HPRP).

The Emergency Solutions Grant Interim Rule published April 1, 2017, and incorporates the addition to the ESG Program Interim Rule of section 576.409 regarding protections for victims of domestic violence, dating violence, sexual assault, or stalking, which was established in response to the Violence Against Women Reauthorization Act of 2013. The name change from the Emergency Shelter to the Emergency *Solutions* Grant highlights the focus on permanent housing rather than short-term shelters. Re-housing for people who are homeless is strongly prioritized. HUD adopted 24 CFR 91 and 24 CFR 578 establishing the definition of “chronically homeless” to be used by all recipients, subrecipients, and Continuum of Care Program participants, beginning January 15, 2016. This rule focuses on households and individuals with the longest histories of homelessness and who may also have the highest need. The new rule also establishes procedures for documenting homelessness and maintaining records. Under the current ESG regulations, funds may be used for the Homeless Management and Information System (HMIS), use of which is now required for all ESG-funded services by all service providers (excluding domestic violence shelters) to ensure consistency of data points and reduce duplication of services among providers.

Evanston receives ESG funds based on the needs of its residents and its goal is to provide housing and services in Evanston to the greatest extent possible. At present, all shelters and essential services funded with ESG are located in Evanston. Prevention funds are limited to eligible households living in Evanston. In order to be eligible for Re-housing funding, an individual or household’s last permanent address must be in Evanston or they are residing in a homeless shelter in Evanston. Due to the shortage of affordable housing in Evanston, particularly larger units, a household eligible for Re-housing may choose rental housing located outside of Evanston’s boundaries if no appropriate rental housing is identified in Evanston. All households selected for Rapid Re-Housing subsidies are selected following the policies and

procedures of the Coordinated Entry process established and carried out by the Alliance to End Homelessness in Suburban Cook County (“The Alliance”), Evanston’s Continuum of Care. Clients must continue to meet with their case manager and fulfill requirements of their case plan for the period in which rental assistance is provided.

Below is a brief listing of eligible expenses by category. Additionally, Evanston continues to work with the Alliance and incorporates policies and procedures established in partnership with the Alliance. Included is the Coordinated Entry Protocol for Suburban Cook County.

### **Homeless Management Information System (HMIS)**

Funds may be used for staff salaries and benefits for HMIS management, HMIS licenses and computer security assessments.

### **Emergency Shelter Operational Costs**

Funds may be used for shelter maintenance, operation, rent, repairs, security, fuel, equipment, insurance, utilities, food, furnishings and costs of staff.

### **Street Outreach**

Funds may be used for services relating to employment, health, drug abuse, and education and may include (but are not limited to):

1. Assistance in obtaining permanent housing
2. Medical and psychological counseling and supervision
3. Employment counseling, job placement and job training
4. Nutritional counseling
5. Substance abuse treatment and counseling
6. Assistance in obtaining other Federal, State and local benefits such as mental health benefits; employment counseling; medical assistance; Veteran's benefits; SSI/SSDI, TANF, General Assistance, LINK/SNAP; etc.
7. Other services such as child care and transportation
8. Salaries of program staff to provide the above services

### **Rapid Re-housing**

Funds may be used for Direct Tenant Based Rental and Utilities Assistance, Housing Relocation and Stabilization Services, and case management.

### **Homeless Prevention**

Funds may be used for Direct Tenant Based Rental and Utilities Assistance, Housing Relocation and Stabilization Services, and case management.

## **II. Eligibility Criteria for Prevention and Re-housing Funds**

The City of Evanston’s ESG program policies and procedures are based on its HPRP policies and procedures, modified to include the HUD definition of Chronically Homeless as outlined in 24 CFR 91 and Part 576. Additionally, funded programs and services provide equal access for

individuals in accordance with their gender identity. Households will be reviewed and approved for the program by the ESG Program Review Committee.

To receive **Rapid Re-Housing assistance:**

- A. Household must be homeless as defined under categories 1 or 4 of the homeless definition, §91.5
- B. Head(s) of household whose last permanent residence prior to becoming homeless was an Evanston address at which they resided for six or more months (exception may be made to this requirement for households fleeing domestic violence), or who have a child (children) enrolled in Dist. 65 or Dist. 202, or other Evanston based child care, or who are currently employed in Evanston
- C. The household must have undergone at least an initial consultation and eligibility assessment with a case manager or other authorized representative who is responsible for determining eligibility and the type and level of assistance needed
- D. Based on assessment at intake, household has likelihood of maintaining housing and becoming self-sustaining following the receipt of assistance estimated at 12 months, but could be for a shorter (3 – 6 month) period
- E. Head(s) of household must agree to follow the case management plan developed working with the case manager
- F. Head(s) of household must agree to meet with the designated case manager at least once per month while receiving assistance. Recipients meeting the definitions and requirements of the Violence Against Women Act of 1994 (42 U.S.C. 13701 *et seq.*) or the Family Violence Prevention and Services Act (42 U.S.C. 10401 *et seq.*) are exempt from this requirement.

To receive **Prevention assistance:**

- A. Household must be at risk of becoming homeless under category 2 of the homeless definition.
- B. Households must have an income below 30% of the Area Median Income (AMI) at initial assessment.
- C. Head(s) of household must be an Evanston resident of six months or more, or who have a child (children) enrolled in Dist. 65 or Dist. 202, or other Evanston based child care, or who are currently employed in Evanston.
- D. The household must have undergone at least an initial consultation and eligibility assessment with a case manager or other authorized representative who is responsible for determining eligibility and the type and level of assistance needed.
- E. Based on assessment at intake, household is likely to maintain housing and become self-sustaining following the receipt of medium-term assistance.
- F. Household income must be reassessed at 3-month intervals and remain under 30% of AMI to continue to receive Prevention assistance.
- G. Head(s) of household must agree to follow the case management plan developed working with the case manager.

- H. Head(s) of household must agree to meet with the designated case manager at least once per month while receiving assistance. Recipients meeting the definitions and requirements of the Violence Against Women Act of 1994 (42 U.S.C. 13701 *et seq.*) or the Family Violence Prevention and Services Act (42 U.S.C. 10401 *et seq.*) are exempt from this requirement.

### **III. Standards for targeting and providing essential services related to street outreach**

Street outreach takes place in locations in Evanston where homeless are known to be, such as soup kitchens, churches, hospitals, police departments, libraries and other locations. Case managers engage with eligible people to educate them about housing and supportive services options available. Referrals to services can also come from the Homeless Hotline for the northern suburbs of Cook County. Callers are screened to assess needs and directed to available services in the area. This includes scheduling callers for intake into local housing programs.

#### Referral

Clients are given referrals to mainstream services based on needs; common referral and case management services provided below.

#### Available Essential Services

Case Management services:

1. Obtaining ID
2. Applying for benefits, GA, SSI, SSDI, veterans benefits, SNAP, Section 8 housing vouchers, VASH vouchers
3. Locating housing
4. Applying for housing assistance: IDHS Prevention funds and City of Evanston ESG
5. Applying for Medicaid
6. Creating an individual service plan with goals and implementation steps and timeframes

Health Care services:

1. Physical
2. Vaccinations
3. Psycho-social assessment
4. Psychiatric evaluation and prescription of medication
5. Monitoring medication
6. Health education
7. Establishing a primary health care provider and physician.
8. Creating a coordinated care plan.

Employment services:

1. One-on-one counseling
2. Job clubs
3. Assistance with resumes

4. Job readiness training programs
5. Job referrals

Education services:

1. TABE (Test of Adult Basic Education) testing
2. Career counseling
3. Remedial education/GED
4. Assistance in applying for training programs or education programs
5. Tutoring
6. Tuition assistance

Discharge

Providers use a harm reduction and trauma-informed model for services. The philosophy of *harm reduction* promotes and supports the right of people who use substances and engage in other risky behaviors to be treated with dignity and respect, including their right to exercise self-determination related to use and their right to expect and receive collaboration in therapeutic relationships. *Trauma-Informed Systems* are those in which all components of a given service system have been reconsidered and evaluated in light of a basic understanding of the role that violence plays in the lives of people seeking mental health and addictions services.

**IV. Emergency Shelter: Admission, Diversion, Referral, and Discharge Policies**

The City supports emergency shelters with ESG and local funds. Shelters ensure equal access to individuals in accordance with their gender identity. The YWCA Evanston-North Shore provides shelter for up to 90 days for victims of domestic violence. Connections for the Homeless provides shelter for up to one year for single adults and families.

**Shelter Admission, Diversion, Referral and Discharge Policies:**

Admission

Open to any homeless individual over the age of 17.

- Must be able to function in a congregate setting
- Cannot be disruptive

Individuals seeking admittance go through an intake process that requires an interview with case managers. Case managers review the application and approved clients may move in the following day, or as scheduled based on availability.

Diversion & Referral

Clients who are turned away from the shelter are referred to the nearest shelter and provided with transit/bus fare to get there.

Discharge

Clients may be discharged for three reasons.

1. They have stayed the maximum number of nights.
2. They have completed their case plan, found housing, and moved out.
3. They can be discharged for cause, which includes:
  - a. Violent behavior that is a danger to others or to themselves;
  - b. Persistent no shows for their shelter bed without an acceptable explanation;
  - c. Persistent violation of the curfew causing a disturbance in the shelter.

## **YWCA Evanston-North Shore Domestic Violence Shelter Admission, Diversion, Referral and Discharge Policies:**

### Admission

Admissions are done over the 24-hour crisis hotline.

- Client must be a victim of domestic violence

### Diversion & Referral

Clients who are turned away from the shelter because it is full are referred to the Illinois Help Line (877-863-6338). Clients that call the YWCA hotline and are suicidal are referred to the nearest hospital for assessment before intake can proceed.

### Discharge

Clients can be discharged for the following reasons.

1. Violence
2. Safety violations
3. Drug or alcohol use
4. Repeated failure to follow the rules

In all cases, clients are assisted in finding an alternative shelter and given bus, train or cab fare to travel.

## **V. Coordination**

The City of Evanston continues to work with the Alliance, local agencies that serve the homeless and people at risk of homelessness, and other advocacy organizations to develop and maintain policies and procedures to coordinate provision of emergency shelter, street outreach, homeless prevention and rapid re-housing assistance, mainstream and other services and housing providers. Connections, the primary recipient of City of Evanston ESG funds, participates very closely with the Alliance on many levels. Connections is a member of the Alliance and participates in its Coordinated Entry Committee responsible for setting policies regarding use of federal funds. Additionally, Connections staff participates in the HMIS Committee meeting and Prevention Committee which each meet monthly. The City's Grants and Compliance Specialists is also a member of the Coordinated Entry Committee. Participation across the Board and committees help to ensure clear communication of goals and priorities and decrease redundancies as they relate to ESG funding.

Coordination among ESG recipients is facilitated through the use of HMIS and the By-Names list which is managed by the Alliance and used to determine rapid rehousing recipients based on the VI-SPDAT and client location preference. This is an important component to a more coordinated process for intake and will help determine prioritization for services. In compliance with HUD requirements, all funded programs participate in the coordinated entry process known as Entry Point. Entry Point is the Coordinated Entry System for Suburban Cook County Continuum of Care (CoC). The purpose of Entry Point is to ensure that all people experiencing homelessness have fair and equal access to housing, regardless of race, color, national origin, religion, gender, age, familial status, disability, actual or perceived sexual orientation, gender identify, or marital status. The intake process has been standardized and a by-name vulnerability list for the region, which is maintained by the Alliance as the Entry Point Lead Agency, has been employed to prioritize the most vulnerable for the most intensive housing interventions. This process is used to match individuals to Permanent Supportive Housing and Rapid Re-Housing supports.

## **VI. Prioritization**

The City recognizes that the demand is greater than available resources to provide essential services, emergency shelter, prevention and re-housing that meet all needs. The City and Alliance also recognize that individuals and households must be prioritized to ensure that these limited resources available are allocated in the most efficient and appropriate manner. As stated above, the City of Evanston and the Alliance continue to refine policies and procedures to assess, prioritize and reassess the needs of all individuals and households participating in ESG-funded services, including essential services for those in emergency shelter, rapid re-housing and homelessness prevention activities.

Assessment tools and protocols, in use by all agencies receiving ESG, conform to the requirements established by the Alliance, ESG Subrecipients and City of Evanston. These tools and protocols create consistency in assessments, and provide the basis for appropriate agency referrals, and for targeting and prioritization by program. All ESG subrecipients use this system to help identify immediate needs of participants: emergency shelter, homelessness prevention resources, diversion and stabilization services, or referral to specialized services to determine the individual or family need for emergency shelter or other ESG-funded assistance. Individuals and families in need can undergo the pre-screen over the phone or in person.

Street outreach and emergency shelter are intended to be low-barrier, and the prioritization work focuses on getting people the right housing intervention as needed. Approximately half of seasonal shelter guests served in suburban Cook County stay 7 shelter nights or fewer, so the Alliance focuses on persons who spend longer in shelter when assessing them for a potential housing intervention.

The Alliance manages a central, by-name vulnerable list for the region, maintained within HMIS. Connections also uses HMIS; clients are prioritized by vulnerability factors, and subpopulations

are ranked by different factors including, but not limited to: length of time homeless, lack of access to family and/or community support, and number of previous homeless episodes.

The City's Health and Human Services Department is responsible for administering General Assistance funds. There is a large overlap of populations served by both General Assistance and ESG, and staff will be working to ensure funds are spent in the most efficient manner.

*Essential services for clients in emergency shelter:* ESG funding may be used to provide essential services to individuals and families who are in an emergency shelter. This may include case management, child care, education services, employment assistance and job training, outpatient health services, legal services, life skills training, mental health services, substance abuse treatment services, transportation, and services for special populations.

ESG subrecipients are responsible for assessing an individual or family's initial need for shelter and must reassess that need on an ongoing basis to ensure that only those with the greatest need receive ESG-funded emergency shelter assistance. Shelters that serve families must serve all eligible families. Individuals may not be separated from other members of their household.

*Rapid Re-Housing:* Homeless households whose last permanent address was in Evanston, who resided there for a minimum of six months, and who demonstrate potential to retain permanent housing following a medium-term subsidy of up to six months are eligible for ESG Re-housing.

Risk factors for Rapid Re-housing assistance include, but are not limited to:

- Individuals/Households who lack a fixed, regular, and adequate nighttime residence, meaning:
  - Primary nighttime residence is a public or private place not meant for human habitation; or
  - Living in a publicly or privately operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional housing, and hotels and motels paid for by charitable organizations or by federal, state, and local government programs); or
  - Exiting an institution where (s)he has resided for 90 days or less and resided in an emergency shelter or place not meant for human habitation immediately before entering that institution
- Any individual or family who:
  - Is fleeing, or is attempting to flee, domestic violence;
  - Has no other residence; and
  - Lacks the resources or support networks to obtain other permanent housing

*Prevention:* Evanston households with incomes under 30% of area median that have potential of remaining stability housed following a medium-term subsidy will be targeted for Prevention.

Risk factors for Prevention assistance include but are not limited to:

- Individual or family at imminent risk of losing their primary nighttime residence:

- o Residence will be lost within 21 days after the date of application for Prevention assistance;
- o No subsequent residence has been identified; and
- o The individual or family lacks the resources or support networks needed to obtain other permanent housing
- Unaccompanied youth under 25 years of age, or families with children and youth who do not otherwise qualify as homeless under this definition, but who:
  - o Are defined as homeless under the other listed federal statutes;
  - o Have not had a lease, ownership interest, or occupancy agreement in permanent housing during the 60 days prior to the homeless assistance application;
  - o Have experienced persistent instability as measured by two moves or more in the preceding 60 days; and
  - o Can be expected to continue in such status for an extended period of time due to special needs or barriers
- An individual or family who:
  - o Has an annual income below 30% of median household income for the area based on HUD Part 5 definition; and
  - o Does not have sufficient resources or support networks immediately available to prevent them from moving to an emergency shelter or another place defined in Category 1 of the “homeless” definition; and
  - o Meets one of the following conditions:
    - Has moved two or more times because of economic reasons during the 60 days immediately preceding the application for assistance; OR
    - Is living in the home of another because of economic hardship; OR
    - Has been notified that their right to occupy their current housing or living situation will be terminated within 21 days of the date of application for assistance; OR
    - Lives in a hotel or motel and the cost is not paid for by charitable organizations or by Federal, State, or local government programs for low-income individuals; OR
    - Lives in an SRO or efficiency apartment unit in which more than 2 persons reside or in a larger housing unit in which more than one and a half persons per room reside; OR
    - Is exiting a publicly funded institution or system of care; OR
    - Otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness, as identified in the recipient’s approved Consolidated Plan
- A child or youth who does not qualify as homeless under the homeless definition, but qualifies as homeless under another Federal statute
- An unaccompanied youth who does not qualify as homeless under the homeless definition, but qualifies as homeless under section 725(2) of the McKinney-Vento Homeless Assistance Act, and the parent(s) or guardian(s) or that child or youth if living with him or her.

## VII. Minimum Standards for Permanent Housing

ESG subsidized housing must meet the minimum habitability standards under 24 CFR §576.403(c). This restriction applies to all activities under the Homelessness Prevention and Rapid Re-Housing components, including rental assistance and housing relocation and stabilizations services. In addition:

- If an eligible household needs homeless prevention assistance to remain in its existing unit, the assistance can only be provided if that unit meets the minimum standard.
- If an eligible household needs homeless prevention or rapid re-housing assistance to move to a new unit, the assistance can only be provided if the new unit meets the minimum standards. The unit the household is leaving does not need to be inspected.
- All units must be inspected prior to entering into a lease agreement and prior to occupancy.
- The housing must also comply with any other standards established by the City that exceed or add to these minimum standards.

The same standards apply regardless of the amount of ESG funds involved. For example, the unit must be inspected and confirmed that it meets the ESG minimum habitability standards, even if the only ESG assistance provided is for a security deposit or moving assistance. The Subrecipient is required to document compliance with ESG habitability standards in the program participant's file.

#### *Homelessness Prevention*

When ESG Rental Assistance and/or Housing Relocation and Stabilization Services are provided under the Homelessness Prevention component to help a program participant remain in or move into permanent housing, the ESG minimum habitability standards apply to either the current unit (if the program participant is staying in place) or to a new unit (if the program participant is moving). Even if only a minimal amount of Housing Relocation and Stabilization Services assistance – such as utility arrears/payments (Financial Assistance) or housing stability case management (Services) – is provided under the Homelessness Prevention component to assist a program participant to stay in their unit, the habitability standards apply to the unit and must be documented in the program participant's file.

If the program participants need Homeless Prevention assistance to stay in their current housing, the housing must be inspected and found to meet the minimum habitability standards before the subrecipient incurs ESG costs for any of the following:

- Providing any service to the program participant;
- Entering into a rental assistance agreement with the owner; or
- Making any payment on behalf of the program participant (e.g., rental or utility arrears, rental or utility payments, etc.)

#### *Rapid Re-Housing*

When ESG Rental Assistance and/or Housing Relocation and Stabilization Services are provided under the Rapid Re-housing component to help a program participant move into a new permanent housing unit, the habitability standard apply to the unit into which they are moving

and must be documented in the program participant's file. If Rapid Re-housing services are being provided before a unit has been identified, no habitability inspection is required until there is a unit to be inspected. If assistance with arrears for a prior unit is needed as part of the rapid re-housing assistance, no habitability inspection is required for the old unit on which the arrears are owed, so long as the program participant will be rapidly re-housed in a different unit.

If the program participant needs Homeless Prevention or Rapid Re-housing assistance to obtain housing, the unit into which the program participant is moving must be inspected before the program participant signs the lease and before the subrecipient provides any ESG rental assistance or housing relocation and stabilization services specific to the unit into which the program participant will be moving. One exception to this is the rental application fee. If a program participant applies for several units, only the unit into which they ultimately decide to move must be inspected.

### **VIII. Inspections**

Inspections of any unit supported with leasing or rental assistance funds are required to ensure that the unit meets ESG program requirements for habitability, lead based paint, and rent reasonableness, before any assistance can be provided on behalf of a program participant. When the unit is located in Evanston, Subrecipient must request and coordinate inspections with the City's Property Standards Department. If the unit is not located in Evanston, Subrecipient is responsible for coordinating inspections with a comparable property review entity.

During a nationally declared disaster or locally declared disaster as defined by local health officials (such as COVID-19), City inspectors will have the ability and authority to perform virtual inspections in order to facilitate housing families and individuals in units that meet housing suitability requirements, provided that physical inspections occur within three months after it is declared by local health officials that special measures to mitigate damage caused by the disaster are no longer required.

### **IX. Rent and Utilities Subsidy**

Each household's case will be reviewed by a case manager to assess its capacity to pay a portion of rent and utilities. A household's contribution to rent and/or utilities generally should not exceed 50% of the gross household income using the HUD Part 5 definition. Subsidies may be deep or shallow based on the unique circumstances of each recipient; the amount of subsidy will be reassessed each month. ESG funds may be used for rent and utilities arrearages on a one time basis, security and utility deposits, first and last month's rent and rent and utility subsidies as allowed. The City does not consider any funds for security deposits that are refunded as Program Income and does not expect the Subrecipient to return any such funds.

## **X. Length of Assistance**

Evanston's ESG program can provide subsidies for up to 24 months including, but not to exceed 6 months of rent arrears; subsidies are generally estimated at up to \$2,430 per month for families with children and up to \$1,660 per month for single adults or couples. Case managers meet with clients monthly and practice progressive engagement, wherein households are engaged in case management services and given a basic level of financial support. Monthly monitoring and periodic budget assessments determine if and when the basic level of assistance should be changed or increased. The percent of subsidy paid is meant to decrease throughout the year as households move toward stability and are able to assume responsibility for paying full rent at the end of 12 months. Extending the potential timeframe for households beyond twelve months, with clients required to maintain compliance with their case plan in order to qualify for direct assistance, can help clients overcome the following challenges:

1. Households have not been able to maintain their housing independently following six months of assistance
2. Households remain rent burdened and are not able to achieve financial stability in Evanston's high rent market
3. Landlords are unwilling to write leases for clients based on their history of housing and financial instability.

All households will be re-evaluated at the end of the twelve month period if a subsidy is still required to maintain housing and extension of funding may be approved by the Program Review Committee based on need and the availability of funding. No client will receive more than 24 months of assistance in a three-year period.

## **XI. Type, amount, and duration of housing stabilization and/or relocation services**

Housing relocation and/or relocation services provided to the participant will include basic case management. Housing search, placement, legal services, mediation, and credit repair may be a component to case management or referred out to other service providers.

## **XII. Client Application Process**

A household may enter the ESG program through several avenues, including:

1. Referral from City or other sources including those outlined by the Alliance's Coordinated Entry Protocol
2. By contacting subrecipient(s) directly

After an initial intake screening has been conducted to determine program fit, a potential client will be referred to a case manager who will conduct a full intake application (including initial budget review). Once all information is gathered from the applicant the case manager will present the eligible case to the Program Review Committee. The Review Committee will meet

monthly or as needed to review and approve applicants for assistance through ESG or for referral to other programs or sources. Once an applicant is approved for assistance, case managers will develop a case management plan for each client household. This plan may include referrals to other agencies for needed services (e.g., legal, financial literacy, etc.).

### **XIII. Eligibility Documentation and Recordkeeping**

Subrecipients must establish written intake procedures that include a requirement for written documentation verifying eligibility for program services in accordance with the following preferred order of documentation:

**Third-party Verification** – source documents provided by an outside source.

Third party documentation is the preferable form of verification and includes but is not exclusive to a written statement or document from employer, landlord, public benefit worker, or agency service provider. Written verification sent directly to program staff or via the applicant is preferred.

**Intake/Case Manager Worker Observation** – documented by ESG staff.

Staff documentation may include oral statements made by a social worker, case manager, or other appropriate official at an institution, shelter, or other facility and documented by the program intake worker/case manager. When the Intake Worker is unable to obtain a written or oral statement from a shelter, institution or facility staff, the Intake Worker must document, in writing, their efforts to obtain eligibility documentation and must place their documentation in the client's file.

**Applicant Self-certification** – applicant signed document certifying eligibility.

Self-certification requires a written and signed document by the individual or head of household seeking assistance attesting to the eligibility facts for which they are certifying. A third party may be designated by an applicant to sign documents on their behalf when they are unable to do so. If needed, subrecipient must provide access to language interpretation services and assistive devices necessary for applicants to understand the documents they are certifying.

Self-certification documentation is only used when documented staff efforts verify that third-party or worker observation documentation is not available. However, lack of third-party documentation must not prevent an individual or household from being immediately admitted to emergency shelter, receiving street outreach services or immediately accessing domestic violence/victim service shelter and assistance.

Documentation of all client/applicant information must be available in client/applicant files or if kept electronically, available upon request. Documentation of all efforts to obtain higher preference of verification (3<sup>rd</sup> party and Intake Worker Observation) when lower forms of preference are used, must be in writing and kept in the client/applicant file.

#### **XIV. Subrecipient Funding Agreements**

A written agreement must be entered into between the City and each entity receiving ESG funds. The written agreement forms the basis for the contractual obligation between the parties to fund and implement eligible activities. The agreement will denote the responsibilities attributed to each party, outline the scope of services to be performed, and methods of accountability. Subrecipient desk monitoring will take place at least quarterly and will include review of voucher information submitted for the duration of the grant. Site visits will be conducted periodically based on a risk analysis. Execution of the agreement binds the subrecipient for a specified period of time and may be revised only upon written authorization from the City.

#### **XV. Fiscal Policies & Procedures**

Subrecipients of ESG funds must ensure that they are in compliance with all applicable fiscal and administrative requirements issued by the City of Evanston and the federal government. When a subrecipient's financial policies and procedures are less restrictive, as part of the agreement, the agency agrees to adhere to the following:

- 2 CFR Part 200 Uniform Administrative Requirements, cost principles, and audit requirements for Federal Awards
- 24 CFR Part 576 – Emergency Solutions Grants Program

##### **A. Board of Director Responsibilities**

Upon execution of the agreement between the City and the subrecipient, the subrecipient shall:

1. Immediately report all changes in its articles of incorporation, bylaws, or tax-exempt status to the City.
2. Ensure no member of the Board of Directors is a paid employee, agent or subcontractor.
3. Continue to include representation on the Board of Directors, the broadest possible cross-section of the community, including those with expertise and interest in the provided services, representatives from community organizations interested in the services, and, ideally, past users of the service or similar services.
4. Keep minutes of all regular and special meetings of the Board of Directors, have a regular meeting at least once a year, and upon request.

##### **B. Administrative Oversight**

Subrecipient Administrative/Program Staff responsibilities include:

- Ensure that all expenditures involving the use of federal funds are eligible under the federal and local requirements of the grant
- Approval of purchase orders and contracts to be reimbursed through HUD grant funds are coded properly

- Ensure compliance with all HUD regulations and City Grant Agreement
- Implementation of an internal control system

Subrecipient Financial Officer Responsibilities include:

The finance officer, accountant, or responsible agency representative is responsible for maintaining a computer accounting/bookkeeping system. The agency representative's responsibilities include, but are not limited to:

- Control of accounting documents for processing by the subrecipient
- Preparation of financial reports based on accounting records
- Preparation of all records/reports submitted to the City as required prior to release of funds and subject to review by the agency's Director
- Execution and oversight of all financial procedures designed to avoid or eliminate waste, fraud, or abuse of grant funds.

Internal Controls

Agencies receiving ESG funding shall have:

- Written Policies and Procedures that define staff qualifications and duties, lines of authority, separation of functions, and access to assets and sensitive documents.
- Written Accounting Procedures, including procedures for approving and recording transactions and regular reconciliation of records to check for completeness and accuracy.

A good internal control system should include several basic features, regardless of the organization's size. These include:

- An organization plan that safeguards resources by segregating duties;
- A system of authorization and recording procedures that provides effective accounting control over assets, liabilities, revenues, and expenses;
- An established system of procedures followed by each organizational component in performing its duties and functions;
- Personnel capable of performing their responsibilities; and
- An effective system of internal reviews.

The internal control requirements provide for the separation of duties and the secure storage of accounting records in limited access areas. In maintaining these accounting records a subrecipient should also ensure that:

- Journal Entries are properly approved and explained/supported
- Posting and trial balances are performed on a regular basis; and,
- Fidelity bond coverage is obtained for responsible officials of the organization.

**IX. Recordkeeping**

To ensure eligibility of costs, subrecipient files shall include copies of:

- Funding approval by City Council
- Agreement with the City
- Procurement and Bid information
- Contracts with vendors
- Up to date budget (including copies of budget change requests)
- Expenditure and payment information including supporting documentation
- Characteristics and location of clients served
- Program status and quarterly progress reports
- Audits and financial information
- Monitoring reports
- Other relevant correspondence

#### Record Retention Policy

All ESG files must be maintained for a minimum of five years after the City's grant year closes out with HUD (which may be several years after an individual subrecipient's grant closeout). The City of Evanston will regularly alert subrecipients when a grant year has been closed out, but they should expect to retain records at least ten (10) years from execution of their subrecipient agreement.

#### Access to Records

HUD, City of Evanston staff, the Inspector General of The United States or any of their duly authorized representatives have the right to access subrecipient agency program records. All ESG grantees are required to provide citizens with reasonable access to records regarding the current funded programs and past, consistent with applicable State and local laws regarding privacy and confidentiality.

Information may be provided using aggregate statistics. All clients may be lumped into categories, but no personally identifiable information (PII) may be released. For example, a report may state: 150 clients served this quarter, 60 White, 60 Black/African-American, 15 Native American, 15 Asian. Of those clients, 25 were female head of household, 100 were very low income, and 50 were moderate income.

#### Accounting Records

Financial record keeping is one of the primary areas subject to reviews and one which, if inadequate, can lead to findings and the possible recapture of funds. Accounting systems shall provide reliable, complete, and up to date information about sources and uses of funds.

These are the financial information and records that must be maintained by the agency:

- A computer accounting system that records the source of income and categorizes expenses for grant activity
- Written accounting procedures, chart of accounts, written internal controls, administrative controls, accounting journals and ledgers;

- Payment requests and source documentation (bills, receipts, copies or canceled checks, etc.);
- Comparison of actual checks written with budgeted amounts for each grant;
- Written procedures for determining what is reasonable and allowable under OMB circulars for costs and activities;
- Procurement files (bids, contracts, etc.) and real property inventory;
- Bank account and payroll records; and
- Financial statements, correspondence and audit files.

Records pertaining to ESG activities shall be kept separately. A separate fund should be kept for all grant income and expenses.

### Maintenance of Records

Subrecipients are required to have accounting records that adequately identify the source and application of ESG funds provided to them. To meet this requirement, a subrecipient's accounting system should include the following elements:

- *Chart of Accounts* – This is a list of names and the numbering system for the individual accounts that contains the basic information about particular classification of financial transactions for the organization. Any ESG award must have a unique number identifying it as a source of income. Line Item Expenditures and Line Item Funding Items must be associated with income and expense items identified in the Agency's Chart of Accounts as provided in the application for funding.
- *Cash Receipts Journal* – This journal documents (in chronological order) when funds were received, in what amounts, and from what sources. Each entry in the journal states the name of the individual accounts to be debited and credited, the dollar amount of each debit and credit, the date of the transaction, and any other necessary explanation of the transaction.
- *Cash Disbursement Journal* – This journal documents the expenditures of the organization in chronological order.
- *Payroll Journal* – This journal documents the organization's expenses on salaries and benefits, and distinguishes different categories for regulatory purposes.
- *General Ledger* – After a transaction is entered into a journal, that information also should be transferred to the proper accounts in the general ledger. The process of transferring transaction information from a journal to a ledger is known as "posting". The entries in the journal and ledger should be cross-indexed to permit the tracing of any recorded transaction.
- *Payroll Records* – The largest component of direct cost associated with most awards received by nonprofit organizations is labor. Personnel activity reports or equivalent documentation must meet certain standards. Reports must reflect a determination of the actual activity of each employee, the number of hours spent working on the program and the number of hours spent working with Evanston residents. Time and activity tracking is required of all employees whose salaries are paid in full or in part with ESG funds; funds may only be used to reimburse eligible activities which benefit primarily low and moderate income persons.

### Source Documentation

All accounting records must be supported by source documentation. This is necessary to show that the costs charged against ESG funds were incurred during the effective period of the subrecipient's agreement with the City, were actually paid out, were expended on allowable items, and had been approved by the responsible officials in the subrecipient organization. The source documentation must explain the basis of the costs incurred, as well as show the actual dates and amount of expenditures. Source documents should be included with all voucher requests.

Source documents, such as invoices or time cards, should provide all details of each transaction or activity. Additionally source documents must be readily accessible during monitoring visits. A variety of source documents and records are needed to properly account for grant transactions. These documents include, but are not limited to the following:

- Invoices – originals should be marked paid and dated
- Timesheets – signed by the employee and immediate supervisor
- Service Contracts – all grant funded service contracts must be a written agreement between the subrecipient and the firm/individual.

### **XVI. Agency Compensation**

Agencies providing ESG eligible services may request reimbursement once funds are spent. Funds may be requested as frequently as once a month, but in no case less than once a quarter. A draw down request form must be submitted along with a match report and source documents for all expenses, including time and activity tracking for staff costs. No funds will be disbursed until all required reports and substantiating documentation are submitted.

### **XVII. Reporting/Data Collection**

**Performance Standards:** The following are preliminary performance standards established by the Suburban Cook County Continuum of Care to measure the goals of reducing and eliminating homelessness.

- Engagement rate: the percent of persons exiting shelter where the destination is known
- Percent of persons exiting shelter who used 30 shelter-nights or fewer
- Percent exited to permanent housing, for each component type (shelter, HP, RRH)
- Follow up on housing status at 6 month following the end of assistance

Reporting requirements for ESG have not been finalized. Once requirements are established, the City of Evanston will work with Subrecipients to establish compliance.

### **Case Management Requirements**

Case managers will be expected to:

- Conduct an initial intake
- Complete full application with client
- Collect and store verification documents
- Maintain confidentiality as described in the subrecipient agreement for a period of four (4) years following the termination of said agreement.
- Participate in the ESG Program Review Committee, as appropriate
- Assess client needs and coordinate/facilitate the case management service plan
- Follow up with each client to gauge compliance with case management service plan
- Keep case notes for each household served
- Input client level data into HMIS. It is recommended that information be input into HMIS immediately following client contact or service provision.
- Meet with the client(s) at least once a month
- Conduct a home visit at least once during the period of time in which a household is receiving direct assistance
- After their exit from the ESG program, households are able to re-engage in case management if they are still in need of assistance.

All clients should, in addition to the initial case management budget session, receive budgeting help as part of case management or be referred to an approved budget counseling program, such as Money Management International (workshop or telephone consult) or the YWCA Evanston/North Shore (workshop).

Although assistance may be approved for up to six months, case managers may recommend early termination of assistance if it is determined that a household requires less assistance. Assistance must be terminated for any Prevention client whose income equals or exceeds 30% of AMI at their three month evaluation. Either lack of compliance with their case management plan or if information provided in the initial application was false constitutes grounds for immediate termination of assistance.

### **XVIII. Lead-Based Paint Requirements**

Federal lead-based paint requirements apply any time federal funds are used for housing assistance and the living space or unity was built prior to 1978, except housing for the elderly or persons with disabilities (unless any child who is less than 6 years of age resides or is expected to reside in such housing, then the requirements do apply) or any 0-bedroom dwelling. The Lead-Based Paint Poisoning Prevention Act (42 U.S.C. 4821-4846), the Residential Lead-Based Paint Hazard Reduction Act of 1992 (42 U.S.C. 4851-4856), and implementing regulations in 24 CFR part 35, subparts A, B, H, J, K, M and R apply to all shelters assisted with ESG funding and all housing occupied by program participants.

The following subparts of HUD's implementing regulations at 24 CFR part 35 include:

- Subpart A – Lead disclosure rule
- Subpart B – General requirements
- Subpart H – Project-based assistance

Subpart J – Rehabilitation

Subpart K – Acquisition, leasing, support services, or operation

Subpart M – Tenant-based rental assistance

Subpart R – Methods and standards for hazard evaluation and reduction

Subrecipient must provide the lead hazard information pamphlet to any resident who will be residing in a unit built before 1978. The tenant must receive the pamphlet before moving into the unit. If subrecipient can document that the tenant received the pamphlet previously, subrecipient is not required to provide it again.

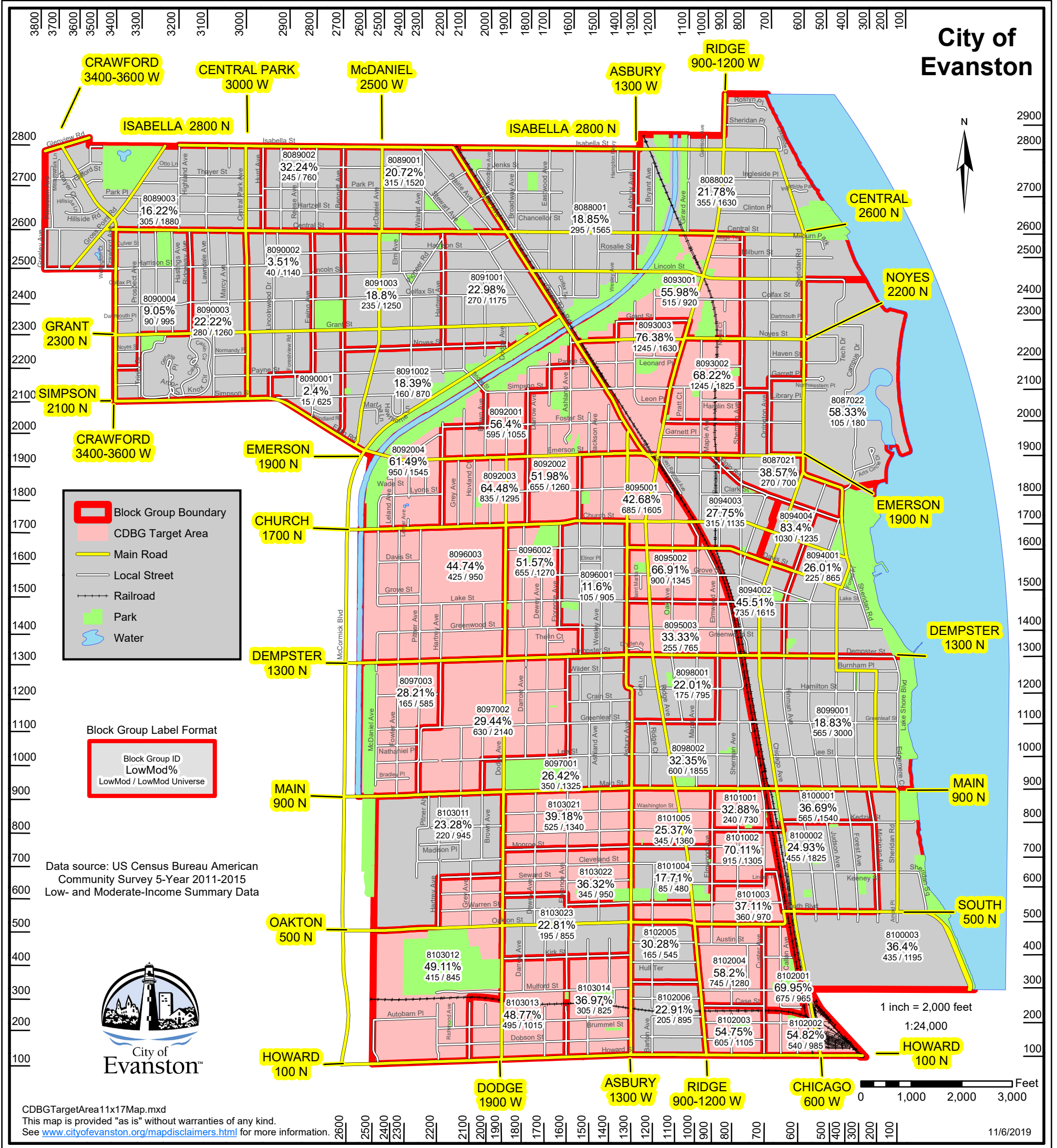
For units older than 1978 which will house one or more children under the age of 6, landlord and tenant must complete a Lead-Based Paint Disclosure form (see OHCS website for sample form). The form describes any known current or previous lead-based paint hazards, and documents tenant's receipt of records and the lead hazard information pamphlet. Additionally, a visual lead-based paint assessment must be completed by a person trained in this inspection process. The inspection may be completed in conjunction with the habitability inspection if the inspector is qualified. At Intake, it should be noted on the Application Form if there will be any child in the household younger than 6 years. This information should be provided to the habitability inspector prior to their examination of the proposed rental unit.

If a notification is received from a public health department or other medical health care provider that a child of less than 6 years of age living in a unit funded by ESG rental assistance, has an elevated blood lead level, an environmental investigation of the dwelling unit and common areas servicing the dwelling unit in which the child lived, regardless of whether the child is still living in the dwelling. For more information, see 24 CFR 35.730 and 35.1225.

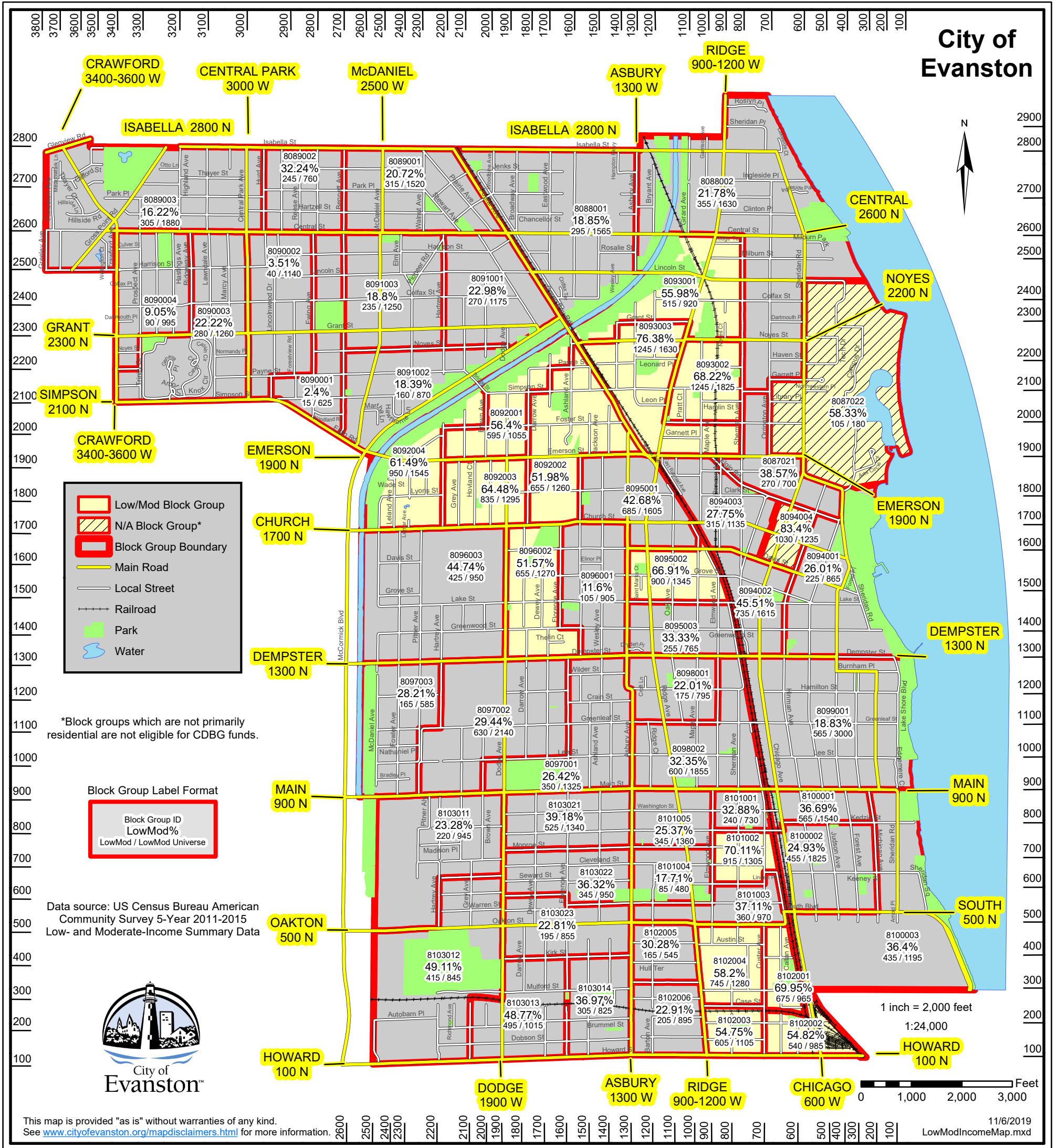
Essential service activities, such as counseling, case management, street outreach, referrals to employment, etc., are exempt and excluded from the lead-based paint inspection requirements.

# CDBG Target Area

City of  
Evanston



# Low/Moderate Income Census Block Groups



\*Block groups which are not primarily residential are not eligible for CDBG funds.



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11/6/2019  
LowModIncomeMap.mxd