

Resubmitted on 5/10/2023 with corrections requested from HUD

DRAFT

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

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

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

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

Consultation

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

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

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

Template:

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

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

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

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

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

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

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

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

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

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

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

List of Organizations Consulted:

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

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

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

			quality options.
South Suburban Pads	Homeless Service providers – all qualifying populations	Listening Session, Coordinated Meetings, Electronic Communications	<ul style="list-style-type: none"> In March 2020, closed church-based shelter and moved everyone to hotel rooms; began with 40 hotel rooms, currently at about 60 hotel rooms serving 120 - 150 people each night; provided PPE and health care resources and vaccines; provided on-site vaccinations to keep all healthy.
Journeys - The Road Home	Homeless Service Provider	Microsoft Teams	<ul style="list-style-type: none"> We need more affordable housing and shelter dollars especially for the homeless population. Regarding Congregate Shelter Updates, Journey's indicated they are providing 5 nights a week rotating shelter, with registration at HOPE Day Center.
Catholic Charities	Homeless Services Provider/Domestic Services Provider/Veteran Service Provider and populations At-Risk of Being Homeless	Microsoft Teams	<ul style="list-style-type: none"> Break down barriers for accessing services. Government needs to stop expecting organizations to stop homelessness or provide more funding to end crisis.
Housing Authority of Cook County (HACC)	Public Housing Agency (PHA)	Teams Meetings	<ul style="list-style-type: none"> Willing to work with County on providing additional funding for fixed-site shelter. Served as County's Program Manager for Emergency Rental Assistance. Developer of Affordable Housing Units.
Chicago Area Fair Housing Alliance (CAFHA)	Advocacy Agency for Fair Housing	Teams Meeting	<ul style="list-style-type: none"> Working on collaborations and monitoring program. Wants to make sure we follow Fair Housing Guidelines. Currently working with County on AFFH Plan.

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

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

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

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

Public Participation

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

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

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

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

Template:

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

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

Describe the public participation process:

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

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

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

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

Public Comment Opportunities

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

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

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

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

Public Hearing Invite

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

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

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

Cook County also had an in-person public hearing on March 22, 2023, at 8:00 -9:30 am. The public was invited to attend the public hearing at 69 W. Washington Floor 22, Room D, Chicago, IL, 60602.

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

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

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

Describe efforts to broaden public participation.

- Routine Website updates on website in response to comments
- Posted Meeting Notice in Spanish Language
- Presentation and status update to the Economic Development Advisory Committee (Public Meeting)
- Email communication of Plan to 436 affordable housing industry contacts. providers, stakeholders, and elected offices, seeking comment.

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

- Continued and stated commitment to work with Illinois Housing Development Authority (IHDA) Tax Credit and Permanent Supportive Housing Funding, as stated, along with other

standard funders such as DCEO and IHDA inside their HOME -ARP, AROPA SLRF and CDBG-CV initiatives is a recommendation the County will incorporate.

- Removal of the Cap of \$50,000 per dwelling unit will be modified to a position the County will place a bonus or premium on investment in developments that include non-congregant and transitional units. We recognize and agree that it is unlikely that HOME-ARP will be sufficient to cover the full costs of all developments”, as recommended through comments.
- The recommendation to consistently state any targeting of affordability be focused on Extremely Low-Income residents will be undertaken through consistent statement to those goals throughout the document, as recommended, in agreement with the emphasis on reducing housing cost-burdens to families.

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

Cook County received written comments direct from the Alliance to End Homelessness (Suburban Cook County) and its membership, along with verbal comments during the public hearing combined with the Economic Development Advisory of Cook County. The Alliance membership comments included:

- Incorporating Housing Authority of Cook County vouchers would “create eligibility criteria for and waitlist requirements that are inconsistent with immediate access to shelter... HOME-ARP will play an important role in supporting both congregant shelter and affordable housing and... they support and encourage the use... to offer safe, stable, permanent housing.”
 - Suburban Cook County efforts lacks a direct revenue source to support the operation of non-congregant and transitional housing developments and will examine all forms of financing to support a portfolio of both non-congregant and transitional housing assets. Additional resources are required to reduce appropriation risk until a long-term source is defined to support non-congregant housing efforts in the State.
 - Incorporation of vouchers will continue to be an option on a portion of developments to support operations, if feasible, leaving the potential of developing additional non-congregant units free to service the immediate need of residents. Supplying vouchers provides both a means to support operations, lacking the defined operating support, while leading to a path for stable housing for residents within a calendar year. As shelter has increasingly become a more transitional option, with extended stays, the gap to reaching a voucher status is definitively shorter and worth consideration in the County’s view.
- The definition of transitional housing transitional shelter when compared to non-congregant housing as utilized within the subject report was questioned as to the intent. The former terms being symbolic of longer term stays with an obligation while the Asylum is seeking shelter opportunities where the individuals and families are not required to sign a lease or occupancy agreement.
 - Post-pandemic reporting shows the homeless populations within the hotel-sheltering component supported by other APRA funding have extended stays averaging above 90 days and into the mid-100 day range across the board, effectively converting emergency shelter opportunities into transitional housing.
 - While County supports the aspirational goal of the Suburban Continuum of Care and its partners is to reduce this average stay to 60 days, the actual outweighs the

aspirational goals and call for solution that leads to housing stability in the form of transitional housing, leading to long-term stable housing, with the strong services supports of the Continuum and its partners.

- Recommendation was given that, “Special attention must be paid to the large gap in the South Suburbs”, with alignment of project selection process aligned to the needs assessment supplied by Clutch Consulting. Additionally, recommendation was given to increase funding dedicated to non-congregant shelter to 60% of the overall award with an associated reduction in the allocation from affordable housing considerations.
 - The County believes both the overall County considerations of funding throughout the County and the allocations to eligible uses are appropriately meeting the defined need of both immediate shelter and the increasing need for affordable options to house individuals and families stably, long term.
 - HOME-ARP is not seen as the only funding source or solution for the Homeless crisis in Suburban Cook. Additional funding including CDBG-CV, Corporate ARP allocations to support no-congregant and other resources including Corporate and HOME funds to take on the transitional and permanent elements.
 - The County is attempting to use the HOME-ARP to create both a permanent shelter system and affordable permanent options to transition.
 - Options of funding non-congregant shelter have not been limited to the HOME-ARP by the County and other resource allocations should be taken into consideration in the flows of funding to support non-congregant shelter and transitional housing development, which supports the County in not modifying the planned eligible use categorizations and the lack of preferences or set asides for regions of the County.
- A recommendation was presented to add language included within the State HOME-ARP program to allow for a potential partnership with Non-Congregate Shelter and coordinated Entry which the County and this stage is not undertaken. The County has taken the position that we will not have any preferences at this stage. Elements of Coordinate Entry have inherent preference and/or priorities, potentially limiting access to qualifying populations, thus we are not undertaking this system as a source point currently.

Needs Assessment and Gaps Analysis

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

Template:

OPTIONAL Homeless Needs Inventory and Gap Analysis Table

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

Data Sources: 1. Point in Time Count - 2022 <https://suburbancook.org/wp-content/uploads/2022/05/2022-Fact-Sheet.pdf>,

2. HUD 2022 Continuum of Care Homeless Assistance Program Housing Inventory County Report https://files.hudexchange.info/reports/published/CoC_HIC_CoC_IL-511-2022_IL_2022.pdf

OPTIONAL Housing Needs Inventory and Gap Analysis Table

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

Data Sources: 1. Housing Needs Assessment Report

https://www.policymap.com/report_widget?type=fur&area=predefined&sid=10192&pid=696961170

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

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

Homeless as defined in 24 CFR 91.5

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

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

At Risk of Homelessness as defined in 24 CFR 91.5

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

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

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

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

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

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

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

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

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

Describe the unmet housing and service needs of qualifying populations:

Homeless as defined in 24 CFR 91.5

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

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

At Risk of Homelessness as defined in 24 CFR 91.5

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

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

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

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

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

As we consider the populations at risk of becoming Homeless, the impact of COVID 19 further destabilized housing security, as families were forced to address both economic and medical hardships. Unemployment increased, wages plummeted, and people lost their housing. Households forced to seek shelter in congregate settings were now exposed to serious illness, which led to the abandonment of the PADs model for transient housing.

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

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

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

Cook County recognizes this qualifying population in the point in time count of homeless in suburban Cook County and is working to gather more information from our partners in this area in order to speak about their distinct needs. Law Enforcement partners shared they lack enough shelters in the suburbs where these victims may seek refuge and services and subsequently need to direct them to facilities in the City of Chicago. Law Enforcement agencies are the front-line guardians, without accessible facilities limit exit from unsafe households. Additionally, we have identified a shortage of units to support victims in the Southwest Suburbs and the Northwest quadrant of the County as populations move through immigration and migration patterns in the Chicago Area.

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

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

- The very-low-income stock of housing is severely deficient to support the demand for affordability at 30% AMI or below and to eligible households defined under HOME-ARP.
- Increasingly, there is regional pressure on the units below 50% AMI with increased housing expenses in the overall region.
- Ancillary populations, including cost burdened households, are under extreme risk of homelessness as acquiring and retaining affordable units are outside their means.

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

The current level of shelter provision is absent long-term physical spaces to house the Homeless in crisis. This is the largest gap in the delivery system as the County is starting with minimal fixed site shelters. While ongoing activities to acquire and transition Hotel and Commercial spaces are underway, this remains only an interim step to the long-term development of transitional housing and non-congregate shelter assets for the delivery of Homeless Services and provision of stability.

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

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

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

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

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

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

Identify priority needs for qualifying populations:

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

1. Homelessness as defined in 24 CFR 91.5 require the development of transitional shelter with services leading to stability inclusive of permanent rental units targeted to households at 30% of area median income for long term stability.
2. At Risk of Homelessness as defined in 24 CFR 91.5 require development of new units at 30% of area median income to meet the demand of households who are currently experiencing housing costs burden or living in substandard housing situations, including overcrowding and substandard physical conditions.
3. Those Fleeing, or Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking, as defined by HUD in the Notice require the creation of new housing units within safe conditions and provisional inclusion within the overall portfolio of affordable housing being created County-wide, either through financial subsidy or set aside within projects funded under the subject funding.
4. Other populations requiring services or housing assistance to prevent homelessness and other populations at greatest risk of housing instability, as defined by HUD in the Notice require the development of additional affordable housing units specifically targeted to households under 30% AMI to offset the demand in the market which is currently over-supplying 50% AMI units. Additionally, units supporting Veterans need to be incorporated into the overall portfolio to meet the demand for quality, affordable units to support recovering and returning Veterans.

In general, all the qualified populations require:

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

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

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

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

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

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

HOME-ARP Activities

Template:

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

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

Describe whether the PJ will administer eligible activities directly:

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

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

Not Applicable (N/A).

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

Use of HOME-ARP Funding

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

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

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

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

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

HOME-ARP Production Housing Goals

Template

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

410 total dwelling units:

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

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

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

Both goals enumerated above will address this need.

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

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

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

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

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

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

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

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

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

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

Template:

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

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

Referral Methods

PJs are not required to describe referral methods in the plan. However, if a PJ intends to use a coordinated entry (CE) process for referrals to a HOME-ARP project or activity, the PJ must ensure compliance with Section IV.C.2 of the Notice (page 10).

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

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

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

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

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

Template: Focus on our Referral Methods

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

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

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

There will be no exclusion of any qualified populations.

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

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

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

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

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

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

Limitations in a HOME-ARP rental housing or NCS project

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

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

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

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

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

Template

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

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

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

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

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

N.A.

HOME-ARP Refinancing Guidelines –

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

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

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

N.A.

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

N.A.

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

N.A.

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

N.A.

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

N.A.

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

N.A.

County of Cook, Illinois



Substantial Amendment to the 2021 Annual Action Plan

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

Prepared by:

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

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SUMMARY

SUBSTANTIAL AMENDMENT NARRATIVE

Proposed Amendment

APPENDIX 1 - STAKEHOLDER CONSULTATION AND CITIZEN PARTICIPATION

[Cook County HOME-ARP Allocation Plan Draft \(attached\)](#)

Public Notice (attached)

Public Comments and Cook County Responses:
Inserted in the HOME-ARP Plan and included in the meeting minutes.

Economic Development Advisory Council (EDAC) Approval:
The amendment above was presented to EDAC for approval March 22, 2023. See the meeting minutes for details.

SUMMARY

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

SUBSTANTIAL AMENDMENT NARRATIVE

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

Use of HOME-ARP Funding

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

Proposed Amendment #1

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

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

Public Comment Notice

See attached.

Public Comments and Cook County Responses

Uploaded in the HOME-ARP Plan and included in the meeting minutes.

Economic Development Advisory Council (EDAC) Approval

The amendment above was presented to EDAC for approval March 22,2023. See the meeting minutes for details.

HOME-ARP CERTIFICATIONS

In accordance with the applicable statutes and the regulations governing the consolidated plan regulations, the participating jurisdiction certifies that:

Affirmatively Further Fair Housing --The jurisdiction will affirmatively further fair housing pursuant to 24 CFR 5.151 and 5.152.

Uniform Relocation Act and Anti-displacement and Relocation Plan --It will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, (42 U.S.C. 4601-4655) and implementing regulations at 49 CFR Part 24. It will comply with the acquisition and relocation requirements contained in the HOME-ARP Notice, including the revised one-for-one replacement requirements. It has in effect and is following a residential anti-displacement and relocation assistance plan required under 24 CFR Part 42, which incorporates the requirements of the HOME-ARP Notice. It will follow its residential anti-displacement and relocation assistance plan in connection with any activity assisted with funding under the HOME-ARP program.

Anti-Lobbying --To the best of the jurisdiction's knowledge and belief:

1. No Federal appropriated funds have been paid or will be paid, by or on behalf of it, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement;
2. If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, it will complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions; and
3. It will require that the language of paragraph 1 and 2 of this anti-lobbying certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly.

Authority of Jurisdiction --The consolidated plan is authorized under State and local law (as applicable) and the jurisdiction possesses the legal authority to carry out the programs for which it is seeking funding, in accordance with applicable HUD regulations and program requirements.

Section 3 --It will comply with section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701u) and implementing regulations at 24 CFR Part 75.

HOME-ARP Certification --It will use HOME-ARP funds consistent with Section 3205 of the American Rescue Plan Act of 2021 (P.L. 117-2) and the CPD Notice: *Requirements for the Use of Funds in the HOME-American Rescue Plan Program*, as may be amended by HUD, for eligible activities and costs, including the HOME-ARP Notice requirements that activities are consistent with its accepted HOME-ARP allocation plan and that HOME-ARP funds will not be used for prohibited activities or costs, as described in the HOME-ARP Notice.



Signature of Authorized Official

3/29/2023

Date

Director, Cook County Planning and Development
Title

Application for Federal Assistance SF-424

*** 1. Type of Submission:**

- ☐ Preapplication
☒ Application
☐ Changed/Corrected Application

*** 2. Type of Application:**

- ☒ New
☐ Continuation
☐ Revision

*** If Revision, select appropriate letter(s):**

*** Other (Specify):**

*** 3. Date Received:**

3/29/2023

4. Applicant Identifier:

5a. Federal Entity Identifier:

5b. Federal Award Identifier:

M-21-DP-17-0213

State Use Only:

6. Date Received by State:

7. State Application Identifier:

8. APPLICANT INFORMATION:

*** a. Legal Name:**

Cook County

*** b. Employer/Taxpayer Identification Number (EIN/TIN):**

36-6006541

*** c. UEI:**

TAQGTNNU9YC3

d. Address:

*** Street1:**

69 W. Washington Ste. 2900

Street2:

*** City:**

Chicago

County/Parish:

*** State:**

IL: Illinois

Province:

*** Country:**

USA: UNITED STATES

*** Zip / Postal Code:**

60602-3134

e. Organizational Unit:

Department Name:

Bureau-Economic Development

Division Name:

Dept-Planning and Development

f. Name and contact information of person to be contacted on matters involving this application:

Prefix:

Ms.

*** First Name:**

Susan

Middle Name:

M.

*** Last Name:**

Campbell

Suffix:

Title:

Director, Dept. of Planning and Development

Organizational Affiliation:

Cook County Bureau of Economic Development

*** Telephone Number:**

312-603-1033

Fax Number:

312-603-9970

*** Email:**

Susan.Campbell@CookCountyil.gov

Application for Federal Assistance SF-424

*** 9. Type of Applicant 1: Select Applicant Type:**

B: County Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

* Other (specify):

*** 10. Name of Federal Agency:**

U.S. Department of Housing and Urban Development

11. Catalog of Federal Domestic Assistance Number:

14.239

CFDA Title:

HOME Partnership Program-American Rescue Plan (HOME-ARP)

*** 12. Funding Opportunity Number:**

M-21-DP-17-0213

* Title:

HOME Partnership Program-American Rescue Plan (HOME-ARP)

13. Competition Identification Number:

Title:

14. Areas Affected by Project (Cities, Counties, States, etc.):

Add Attachment

Delete Attachment

View Attachment

*** 15. Descriptive Title of Applicant's Project:**

HOME Partnership Program-American Rescue Plan (HOME-ARP). Please see the attached document that indicates planned activities. There is not enough space on this document to fill the information in.

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments

Application for Federal Assistance SF-424**16. Congressional Districts Of:*** a. Applicant * b. Program/Project

Attach an additional list of Program/Project Congressional Districts if needed.

Add Attachment

Delete Attachment

View Attachment

17. Proposed Project:* a. Start Date: * b. End Date: **18. Estimated Funding (\$):**

* a. Federal	<input type="text" value="23,837,306.00"/>
* b. Applicant	<input type="text"/>
* c. State	<input type="text"/>
* d. Local	<input type="text"/>
* e. Other	<input type="text"/>
* f. Program Income	<input type="text"/>
* g. TOTAL	<input type="text" value="23,837,306.00"/>

*** 19. Is Application Subject to Review By State Under Executive Order 12372 Process?**

- ☐ a. This application was made available to the State under the Executive Order 12372 Process for review on
- ☐ b. Program is subject to E.O. 12372 but has not been selected by the State for review.
- ☒ c. Program is not covered by E.O. 12372.

*** 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**☐ Yes ☒ No

If "Yes", provide explanation and attach

Add Attachment

Delete Attachment

View Attachment

21. *By signing this application, I certify (1) to the statements contained in the list of certifications** and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 18, Section 1001)

☒ ** I AGREE

** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

Authorized Representative:

Prefix: * First Name:

Middle Name:

* Last Name:

Suffix:

* Title: * Telephone Number: Fax Number: * Email:

* Signature of Authorized Representative:

* Date Signed:

Eligible Activities Include:

1. Supportive Services
2. Acquisition and Development of Non-Congregate Shelters (Planned)
3. Tenant Based Rental Assistance (TBRA)
4. Development of Affordable Rental Housing (Planned)
5. Non-Profit Operating
6. Non-Profit Capacity Building
7. Administration and Planning

ASSURANCES - NON-CONSTRUCTION PROGRAMS

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0040), Washington, DC 20503.


PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.

NOTE: Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the awarding agency. Further, certain Federal awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duly authorized representative of the applicant, I certify that the applicant:

1. Has the legal authority to apply for Federal assistance and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project cost) to ensure proper planning, management and completion of the project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, through any authorized representative, access to and the right to examine all records, books, papers, or documents related to the award; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
4. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
5. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards for merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
6. Will comply with all Federal statutes relating to nondiscrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1681-1683, and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. §794), which prohibits discrimination on the basis of handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended, relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290 dd-3 and 290 ee-3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and, (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.
7. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal or federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
8. Will comply, as applicable, with provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.

9. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333), regarding labor standards for federally-assisted construction subagreements.
10. Will comply, if applicable, with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
11. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) Implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
12. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
13. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq.).
14. Will comply with P.L. 93-348 regarding the protection of human subjects involved in research, development, and related activities supported by this award of assistance.
15. Will comply with the Laboratory Animal Welfare Act of 1966 (P.L. 89-544, as amended, 7 U.S.C. §§2131 et seq.) pertaining to the care, handling, and treatment of warm blooded animals held for research, teaching, or other activities supported by this award of assistance.
16. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
17. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
18. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
19. Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL 	TITLE Director, Planning and Development
APPLICANT ORGANIZATION Cook County- HOME-ARP	DATE SUBMITTED 3/29/2023

ASSURANCES - CONSTRUCTION PROGRAMS

OMB Number: 4040-0009
Expiration Date: 02/28/2025

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0042), Washington, DC 20503.


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As the duly authorized representative of the applicant, I certify that the applicant:

1. Has the legal authority to apply for Federal assistance, and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project costs) to ensure proper planning, management and completion of project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, the right to examine all records, books, papers, or documents related to the assistance; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will not dispose of, modify the use of, or change the terms of the real property title or other interest in the site and facilities without permission and instructions from the awarding agency. Will record the Federal awarding agency directives and will include a covenant in the title of real property acquired in whole or in part with Federal assistance funds to assure non-discrimination during the useful life of the project.
4. Will comply with the requirements of the assistance awarding agency with regard to the drafting, review and approval of construction plans and specifications.
5. Will provide and maintain competent and adequate engineering supervision at the construction site to ensure that the complete work conforms with the approved plans and specifications and will furnish progressive reports and such other information as may be required by the assistance awarding agency or State.
6. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
7. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
8. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards of merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
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SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL	TITLE
	Director, Planning and Development
APPLICANT ORGANIZATION	DATE SUBMITTED
Cook County- HOME-ARP	3/29/2023

Order ID: 7396665

* Agency Commission not included

GROSS PRICE * : **\$104.34**

PACKAGE NAME: IL Govt Legal Notice CTC

GROSS PRICE * : \$104.34

PACKAGE NAME: IL Govt Legal Notice CTC

Product(s): Chicago Tribune , Publicnotices.com

AdSize(s): 1 Column

Run Date(s): Sunday, March 12, 2023

Zone: Full Run

Color Spec. B/W

Preview

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

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

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

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

Public Comment Opportunities

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

<https://www.cookcountvil.gov/service/public-notices-planning-and-development-2>

All interested parties are encouraged to provide written comments. Written comments for the Draft Substantial

GROSS PRICE * : \$104.34

PACKAGE NAME: IL Govt Legal Notice CTC

Amendment to the 2021 Annual Action Plan/ HOME- ARP Allocation Plan are being accepted during the applicable public comment period specified above and must be received by 4 p.m. on the last day of the aforementioned public comment period in order to receive consideration. Written comments must be directed to Karl Bradley, Deputy Director, Cook County Department of Planning and Development, 69 West Washington, Suite 2900, Chicago, IL 60602, Karl.Bradley@cookcountyl.gov.

Public Hearing Invite

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

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

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

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

Order ID: 7396665

* Agency Commission not included

GROSS PRICE * : **\$104.34**

PACKAGE NAME: IL Govt Legal Notice CTC

[https://www.cookcountyil.gov/service/public-notices-planning-and-development-](https://www.cookcountyil.gov/service/public-notices-planning-and-development)

[Q](https://www.cookcountyil.gov/service/public-notices-planning-and-development)

For Citizens who require additional accommodations and/or language translations please contact Deputy Director Karl Bradley at Karl.Bradley@CookCountyil.gov. Phone number 312-603-1000.
March 12, 2023 - 7396665

03/16/2023

Agenda for **Public Hearing for the Substantial Amendment to the 2021 Annual Action Plan/
HOME-ARP Allocation Plan**

1 872-215-6022 Conference ID: 470554806#

10:30 AM – 11:30 AM

[Microsoft Teams](#)

Agenda:

- I. Welcome – Susan Campbell, Director, Cook County Planning and Development

- II. Informational Items (if applicable)

- III. Public Hearing Item
Substantial Amendment to the 2021 Annual Action Plan/HOME-ARP Allocation
Plan-Presented by Karl Bradley Deputy Director of Housing
 - Brief Presentation by Senior Management
 - Discussion
 - Public Comments
 - Request for Recommendation to Full EDAC

- IV. Public Comment

- V. Adjournment

Minutes for Public Hearing and Public Comment Opportunity for Regarding The Substantial Amendment to the 2021 Annual Action Plan/HOME-ARP Allocation Plan

10:30 AM, March 16st, 2023 (Microsoft Teams)

Call to order:

Susan Campbell, Director, Cook County Planning and Development, called to order the Public Hearing and Public Comment Opportunity Regarding the Substantial Amendment to the 2021 Annual Action Plan/HOME-ARP Allocation Plan at 10:30 AM.

DPD Present: Susan Campbell, Karl Bradley, Cheryl Cooke, David Washington, Angela Macklin, Patricia Wilson, Paul Elue, Eva Garrett, Xochitl Flores

Members from the Public present: Doug Kenshol, Chris Martinez, Ahmad Zayyad, Alonzo Hunter

Public Hearing Item:

The Substantial Amendment to the 2021 Annual Action Plan/ HOME-ARP Allocation Plan was Presented by Karl Bradley

Deputy Director of Housing

The overview of the HOME-ARP Allocation Plan (including funding amount and eligible activities)

Public Participation Process

Public Hearing dates and location (both virtual and in person options)

Challenges and planned approach regarding allocation of funds

Needs assessment and gap analysis

Marketing efforts

Program Implementation Dates

Consultation Guidance

There was one public comment-Doug Kenshol discussed the importance of dedicating 60% of the overall HOME-ARP funds to non-congregate shelter versus the proposed, 60% net of administration costs, and the importance of setting aside the funds for the Southern portion of the County. DPD management had a robust conversation with Doug in response to his comments.

No one from the public disapproved the proposed activities outlined in the Substantial Amendment to the 2021 Annual Action Plan/ HOME-ARP Allocation Plan.

The meeting was adjourned at 11:30 am

Order ID: 7398930

* Agency Commission not included

GROSS PRICE * : **\$60.16**

PACKAGE NAME: IL Govt Legal Notice CTC

Order ID: 7398930

* Agency Commission not included

GROSS PRICE * : \$60.16

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Zone: Full Run

Color Spec. B/W

Preview

GROSS PRICE * : \$60.16

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**COOK COUNTY 2021 ANNUAL ACTION
PLAN AMENDMENT HUD ENTITLEMENT
GRANT FUNDS /HOME-ARP ALLOCATION
PLAN PUBLIC HEARING INVITE**

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

Public Hearing Invite

An important part of the process of developing a Draft Substantial Amendment to the 2021 Annual Action Plan/ HOME-ARP Allocation Plan is to promote citizen participation and solicit input. Cook County has made the Draft Substantial Amendment to the 2021 Annual Action Plan/ HOME-ARP Allocation Plan available at the following website:

<https://www.cookcountyil.gov/service/public-notices-planning-and-development-0>
Cook County is inviting the Public to attend either the in-person, or the virtual public hearing below to hear the details and provide feedback regarding the Draft Substantial Amendment to the 2021 Annual Action Plan/HOME-ARP Allocation Plan:

In person option: 69 W. Washington (22nd Floor, Room D) Chicago, IL 60602 from 8:00 am to 9:30am on March 22nd, 2023.


Virtual Option: To attend the Microsoft Teams virtual public hearing on March 22nd, 2023 at 8:00 am – 9:30 am, please dial 1-872-215-6022 and enter Phone Conference ID 557622737#. To view and join the meeting, copy and paste the link below in your browser:

https://teams.microsoft.com/l/meetup-join/19%3ameeting_Y2NjMWE1OGMtMTBjNi00NTYyLTk3MGQyYTRhNGFkMG12MmM1%40thread.v2/0?context=%7b%22Tid%22%3a%228b4d55ae-6db4-4e05-a85c-59d6a256cd6e%22%2c%22Oid%22%3a%224e67e4d6-f7ce-4915-85c7-cb7384ddd45%22%7d

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

<https://www.cookcountyil.gov/service/public-notices-planning-and-development-0>
For Citizens who require additional accommodations and/or language translations please contact Deputy Director Karl Bradley at Karl.Bradley@CookCountyil.gov. Phone number 312-603-1000.

3/16/23 7398930

	<p>Agenda for the Public Hearing for the Substantial Amendment to the 2021 Annual Action Plan/HOME-ARP Allocation Plan/ Cook County Economic Development Advisory Committee Meeting</p> <p>8:00 AM</p> <p>Wednesday, March 22, 2023</p> <p>In-person option</p> <p>69 W. Washington</p> <p>22nd Floor, Room D Chicago, IL 60602</p> <p>Click Here to Join the Teams Meeting</p> <p>Dial in:</p> <p>+1 872-215-6022,,557622737# United States, Chicago</p> <p>Phone Conference ID: 557622737#</p>	
	Call to Order & Roll Call	Howard Males, Chair, EDAC
	Approval of Minutes	Howard Males, Chair, EDAC
	EDAC Chair's Remarks	Howard Males, Chair, EDAC
	<p>Public Hearing & Presentation for the Substantial Amendment to the 2021 Annual Action Plan/ HOME-ARP Allocation Plan</p> <p><i>Public Comments</i></p> <p><i>General EDAC Discussion</i></p>	Karl Bradley, Deputy Director, DPD - HOME
	<p>Action related to recommendations from EDAC Financial Tools & Incentives Sub-Committee:</p> <ul style="list-style-type: none"> • IG Capital, LLC d/b/a Tony's Finer Foods Class 7B, 200 S. Roselle Rd Schaumburg, IL 60193 • 700 N. Milwaukee, LLC d/b/a District Brew Yards, Class 7C 700 N. Milwaukee, Wheeling, IL 60090 • FR Restaurant, LLC Class 7c d/b/a/ Cultivate Class. 7C 4710 North Ravenswood Ave Chicago, IL 60640 	Sheryl Caldwell, Project Director, DPD
	Small Business Updates	Irene Sherr, Deputy Bureau Chief, Bureau of Economic Development
	Announcements, News & Adjournment	Howard Males, Chair, EDAC



MINUTES

Public Hearing for the Substantial Amendment to the 2021 Annual Action Plan/ HOME-ARP Allocation Plan/ Economic Development Advisory Committee Meeting

Hybrid Public Hearing/EDAC Meeting 03/22/2023 8:00 AM

Hybrid Public Hearing/EDAC Meeting called to order by Chairman Howard Males

Public Commentary

- Chairman Males announced that a quorum was present.
- Chairman Males opened the floor to public commentary. There were no public speakers.

Approval of Minutes

- The minutes from 02/22/23 were approved.

Remarks from EDAC Chairman Howard Males

- Chairman Males welcomed the board members and the public to the Hybrid Public hearing/EDAC meeting.

Planning and Development (Hybrid Public Hearing-Substantial Amendment to the 2021 Annual Action Plan)

- Karl Bradley, Deputy Director of Housing, Cook County Planning and Development presented the Substantial Amendment to the 2021 Annual Action Plan/HOME-ARP Allocation Plan. Karl discussed:
 - Background of HOME-ARP
 - Amount of Funding
 - Purpose of HOME-ARP
 - Eligible Activities & Population
 - Consultation Requirements and Guidance
 - Public Participation Process
 - Date of Public Hearings
 - Challenges and Planned Approach to Mitigate
 - Homeless Needs Inventory and Gap Analysis

Approved. No one opposed. No one abstained.

There were two public comments:

Karl Wolfe (@ Respond Now, Chicago Heights)- Karl's response, centered around funding allocation – he urged the County to invest more of the HOME-ARP funds non-congregate shelter settings. He argued that there are far and fewer funding opportunities for the construction of non-congregate shelters. He indicated that there are more funding opportunities, to fund affordable housing than there are for non-congregate shelters. He would like to see special consideration given to the needs of the South Suburbs, since it has a higher rate of homelessness, in comparison to the rest of Cook County.

Jennifer Hill (Alliance to End Homelessness in Suburban Cook County)- She recommends 15 to 17 million dollars (representing 60 to 70%) of the HOME-ARP funding be spent on non-congregate shelter. Jennifer supports the intended focus of affordable housing resources being provided to people within the extremely low-income category (0 to 30% AMI) and cost burdened for affordable housing resources. Jennifer suggests that the plan should emphasize aligning the non-congregate shelter solicitation approach, with IHDA and DCEO - on shelter acquisition and rehab. Jennifer expressed the importance of focusing on a broad geographic swathe, and not just the South Suburbs, as a method for determining how people will get referred to the program. Jennifer also emphasized the importance of utilizing the Coordinated Entry, and she recommends that the plan mentions Coordinated Entry as a resource for homeless resources. She indicated that the Alliance will provide a written response letter with more details on her feedback, in the next few days. DPD received Jennifer's letter, and incorporated the response into the HOME-ARP Plan.

DPD management acknowledged the public comments, and had a robust conversation with the public regarding the feedback received from the public.

Planning and Development

- Sheryl Caldwell, Project Director, Cook County Department of Planning and Development discussed property tax savings proposal IG Capital Class 7b. Sheryl discussed:
- Project location- 200 S. Roselle Road, Schaumburg, Illinois 60193
- Land sq. ft.: 314,925 sq. ft,
- Building sq. ft.: 65,000 sq. ft.
- Property Tax Savings for applicant: \$9,706,369
- Total Project Cost: \$11,900,000
- Private capital investment to tax incentive savings = 1.2 to 1
- Job creation: 101 full-time jobs / 100 construction jobs

Approved, no one opposed, 1 abstained.

- Sheryl Caldwell, Project Director, Cook County Department of Planning and Development discussed property tax savings proposal 700 N. Milwaukee Class 7c. Sheryl discussed:

- Project location- 700 N Milwaukee, Wheeling, Illinois 60090
- Land sq. ft.: 2.806 acres
- Building sq. ft.: 12,000 sq. ft.
- Property Tax Savings for applicant: \$687,168
- Total Project Cost: \$4,566,000
- Private capital investment to tax incentive savings = 6.6 to 1
- Job creation: 25 new full-time jobs / 25-30 constructions jobs

Approved, no one opposed, 2 abstained.

- Sheryl Caldwell, Project Director, Cook County Department of Planning and Development discussed property tax savings proposal FR Restaurant Class 7c. Sheryl discussed:

- Project location- 4710 North Ravenswood Avenue, Chicago, Illinois 60640
- Land sq. ft.: 27,101 sq. ft,
- Building sq. ft.: 9,800 sq. ft.
- Property Tax Savings for applicant: \$251,000
- Total Project Cost: \$522,000
- Private capital investment to tax incentive savings = 2 to 1
- Job creation: 25 full-time jobs / 25 constructions jobs

Approved, no one opposed, 1 abstained.

Bureau of Economic Development

- Irene Sherr, Deputy Bureau Chief, Bureau of Economic Development provided a Small Business Update. Irene discussed:
 - 22,000 applications received
 - How eligibility is determined
 - Provided an update on pending litigation
 - Allocation Amount
 - Review process and timeline to distribute funds
 - Additional Funds that are being provided by the State

Additional Updates:

William Towns discussed the upcoming Developer Diversity Conference taking place at University of Chicago

Sharon Legenza discussed the Domestic Peace Corps

Adjournment

- Chairman Males called for a motion to adjourn the Hybrid Public Hearing for the Substantial Amendment to the 2021 Annual Action Plan/HOME-ARP Allocation Plan/EDAC Meeting. The Hybrid Public Hearing/EDAC meeting adjourned at 9:30 am.

Attendance

- Howard Males (**Chairman**)
- David Swanson (EDAC Member)
- Austen Edwards (EDAC Member)
- Graham Grady (EDAC Member)
- Teresa Cordova (EDAC Member)
- Sharon Legenza (EDAC Member)
- Jessica Caffrey (EDAC Member)
- William Towns (EDAC Member)
- Karl Bradley
- Sheryl Caldwell
- Jennifer Killen (EDAC Member)
- Susan Campbell
- Cheryl Cooke
- David Day (EDAC Member)
- Isabel Gonzalez
- Sonia Brown
- Lynda Schueler
- Matt Frank
- Paul Elue
- Emilia DiMenco (EDAC Member)
- Mohammed Elahi
- Daryl Newell
- Manny Flores (EDAC Member)
- Xochitl Flores (EDAC Member)
- Irene Sherr
- Ed Sitar (EDAC Member)
- Robert Tucker (EDAC Member)
- Dominic Tocci
- David Washington
- Veda Britt-Handy
- Eva Garrett
- Krista Elam
- Patricia Ruffolo
- Steve Soble
- Ross K.
- Zach Kavitz
- Andrew Scott
- Krysten Sessoms



CHRISTOPHER O'HARA • CHAIR
KERRY THOMAS • VICE CHAIR
TROY O'QUIN • PAST CHAIR
DAVID YOUNG • SECRETARY
LUTICIA FIORITO • TREASURER

JENNIFER C. HILL • EXECUTIVE DIRECTOR

March 27, 2023

Mr. Karl Bradley, Deputy Director
Cook County Department of Planning and Development
69 W Washington St, Suite 2900
Chicago, IL 60602

RE: Written Comment on Draft Cook County HOME-ARP Allocation Plan

Dear Mr. Bradley:

The Alliance to End Homelessness in Suburban Cook County, the lead agency for the Cook County Continuum of Care (IL-511), is submitting written comment on Cook County's Draft HOME-ARP Allocation Plan as part of its 15-day public comment period open from March 12 to March 27, 2023.

Written Comment on Consultation

- In the summary of feedback on page 7, there is a bulletpoint that states: "Collaborating with the Housing Authority of Cook County (HACC) on *funding fixed-site shelter units*". Vouchers provided by HACC will provide much needed operational support for permanent housing. Alliance data shows a strong need for low-barrier, non-congregate shelter options available for immediate access when individuals and families are experiencing a housing crisis. Vouchers create eligibility criteria and waitlist requirements that are inconsistent with immediate access to shelter. Cook County HOME-ARP will play an important role in supporting both non-congregate shelter and affordable housing, and we support and encourage the use of vouchers to offer safe, stable, permanent housing.

Written Comment on Needs Assessment and Gaps Analysis

- In the description of unmet housing and service needs of qualifying populations, there are multiple references to "transitional housing" or "transitional shelter" when referring to non-congregate shelter. HUD defines non-congregate shelter and transitional housing as different components. Non-congregate shelter (NCS) is the term used in the HOME-ARP Notice and in the description of eligible

- activities and requirements. HUD defines non-congregate shelter as private units or rooms used as temporary shelter for individuals and families that do not require occupants to sign a lease or occupancy agreement (i.e., hotel or dormitory-style emergency shelter). HUD defines transitional housing as a housing intervention where all program participants have signed a lease or occupancy agreement and are provided with up to 24 months of assistance.
- On page 14, the description of unmet housing and service needs for the homeless population suggests that “more transitional housing for longer stays are needed”. Since HUD defines transitional housing differently from non-congregate shelter, we recommend revising this statement in the plan to reflect the goal of shorter stays in shelter. The Alliance’s analysis of unmet need for non-congregate shelter is based on a modeling assumption that we can reduce average shelter stays to 60 days, and this is still our system’s goal. We seek to replace longer stays in shelter with rapid placement into permanent housing where people can stay indefinitely.

Written Comment on HOME-ARP Activities

- We support Cook County coordinating solicitations for affordable housing projects with the Illinois Housing Development Authority (IHDA) Tax Credit and Permanent Supportive Housing funding cycles, as stated on page 19. In addition, we encourage Cook County to state its intention to coordinate solicitations with IHDA and DCEO for funding specific to non-congregate shelter development, including Illinois’s HOME-ARP, ARPA SLFRF, and DCEO CDBG-CV solicitations.
- We encourage removing the language in the Draft Plan on page 19 that sets a cap of \$50,000 per unit. Developing non-congregate shelter and affordable rental housing will require multiple sources of public and private funding, and it is unlikely that HOME-ARP will be sufficient to cover the full costs of all developments. However, establishing a cap in the Draft Plan creates an unnecessary barrier prior to the solicitation process and review of applications and true costs.
- We support the plan’s intention to create non-congregate shelter and affordable housing options throughout suburban Cook County. We encourage the project selection process to align with the needs assessment conducted by Clutch Consulting that sets targets for the number of new or reconfigured shelter units needed in each region. Special attention must be paid to the large gap in the south suburbs.
 - North: 171 beds for individuals, 14 family units
 - West: 141 beds for individuals, 11 family units
 - South: 210 beds for individuals, 17 family units
- We strongly recommend **at least 60% or more** of the total HOME-ARP allocation be dedicated to non-congregate shelter acquisition and development (\$14-17 million rather than \$12 million). The draft plan reflects 51% of the total award allocated to non-congregate shelter. (The IHDA HOME ARP Allocation

Plan approved by HUD includes 60% of the total award dedicated to non-congregate shelter.) The Draft HOME ARP Plan references multiple times that the largest gap in our homeless response system is a lack of physical assets to support emergency shelter to serve individuals experiencing a homeless crisis. Funding provided by the CARES Act and American Rescue Plan Act reflect a one-time opportunity to invest dedicated sources of capital funding to build emergency shelter infrastructure. There are other available annual appropriations that can be used for the development of affordable, permanent housing (i.e., HOME, IHDA Tax Credit Programs, and IHDA Permanent Supportive Housing Rounds). Non-congregate shelter development costs are ONLY available through one-time pandemic recovery funding resources like HOME-ARP.

HOME-ARP Activity	Draft Plan Funding Amount	Percentage of Total Award	Recommended Funding Amount	Recommended Percentage of Total Award
Acquisition and Development of Non-Congregate Shelter	\$12,157,026	51%	\$14,302,383	60%
Development of Affordable Rental Housing	\$8,104,684	34%	\$5,959,326	25%
Administration and Planning	\$3,575,595	15%	\$3,575,596	15%
Total HOME-ARP Allocation	\$23,837,305	100%	\$23,837,305	100%

- We support the plan’s emphasis on targeting affordable rental housing to cost-burdened households that are 50% AMI or below, with a focus on Extremely Low Income (0-30% AMI). The need for this deep income targeting is strongly documented throughout the Draft Plan. Non-congregate shelter is generally not income-targeted because homelessness implies a presumed eligibility for income-targeted programs. To ensure consistency throughout the plan, we suggest revising the housing goal on page 21 to state “160 affordable housing units (targeting 0-30% AMI)” and revising the statement on page 22 to read “assisting the population between 0-30% AMI with affordable housing units”.

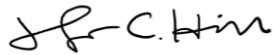
Written Comments on Preferences

- We support the flexibility to serve all qualifying populations. We recommend including the following language, as submitted in the IHDA HOME-ARP Allocation Plan approved by HUD, that describes potential partnerships between Non-Congregate Shelter and Coordinated Entry:

“No preferences are established for the Non-Congregate Shelter eligible activity; if a Coordinated Entry system partners with a shelter facility, that Coordinated Entry system’s preferences or priorities may be applied to the shelter’s policies, as long as they also adhere to serve all Qualifying Populations according to HOME-ARP guidance.”

The Alliance and its partners appreciate this opportunity to comment on Cook County’s Draft HOME-ARP Allocation Plan, and we look forward to our continued partnership with Cook County to re-envision a stronger, more resilient homeless system in suburban Cook County as we recover from the COVID-19 pandemic and its impact on our system.

Sincerely,

A handwritten signature in black ink, appearing to read "J.C. Hill". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

Jennifer C. Hill