



LakeCounty

Housing & Community Development Commission

## **Program Year 2025 Annual Action Plan**

### **Second Amendment**

May 1, 2025 to April 30, 2026

## Executive Summary

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

#### 1. Introduction

The intent of this county-wide Consolidated Plan is to identify housing and community development needs, goals, outcomes and strategies for Lake County, Illinois. It is also the intent of this document to implement, to the greatest extent possible, the goals of the Lake County Board's Strategic Plan. This document serves as a major component toward the official application to the U.S. Department of Housing and Urban Development (HUD) for funding from three current HUD grant programs: Community Development Block Grant (CDBG), HOME Investment Partnership (HOME), and the Emergency Solutions Grant (ESG) Programs for program years 2025 -2029.

~~This first amendment to the Program Year 2025 (PY25) Annual Action Plan (AAP) reallocates \$266,402 of CDBG funding from an affordable housing project. The project was hoping to obtain Low Income Housing Tax Credits (LIHTC) in 2025, however it they were not awarded to the project. The CDBG was reallocated to support:~~

- ~~• CILA Acquisition—Community Partners for Affordable Housing (\$141,031)~~
- ~~• CILA Acquisition—Clearbrook (\$50,000)~~
- ~~• Owner Occupied Rehabilitation—Community Partners for Affordable Housing (\$65,371)~~
- ~~• Sidewalk Improvements—City of Zion (\$10,000)~~

This second amendment to the Program Year 2025 (PY25) Annual Action Plan allocates a total of \$77,702.66 of Program Income (PI). The funds are allocated to existing projects to account for the expiration of \$77,702.66 of FY2018 CDBG funds.

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

The Program Year 2025-29 Consolidated Plan focuses on actions and investments that will support low- and moderate-income residents of Lake County. The following plan will advance progress within the following four goals:

1. Maximize Affordable Housing
2. Improve Homeless Crisis Response System
3. Enhance the living environment for the Lake County Low and Moderate Income (LMI) population
4. Program Administration

### **3. Evaluation of past performance**

The priorities and goals of this ConPlan mimic the PY2020-24 ConPlan, with a focus on housing and homelessness. The continuation of an investment focus on affordable housing is not a result of past failures, rather it is a reflection of housing demand outpacing supply. The continuation of this strategy is a direct result of community needs assessment activities complete as part of this ConPlan process.

During the previous ConPlan cycle Lake County was successful in partnering with the Illinois Housing Development Authority (IHDA) in the development of affordable multifamily properties through the use of the Low-Income Housing Tax Credit (LIHTC). Additional success was in the support of homeownership through the Community Land Trust (CLT) and Down Payment Assistance (DPA) programs.

During Program Year 2024 (PY24), with support from Lake County, PADS Lake County was able to begin the process of developing a permanent fixed site shelter. Upon completion, the shelter will be a significant improvement to the homeless response system. The lack of shelter infrastructure has been a issue facing Lake County for years.

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

The PY25-29 ConPlan was completed in accordance with the Lake County Consortium Citizen Participation Plan (CPP). Following the public announcement a series of public meetings, including public hearings, were held. Each meeting allowed for public comment during the meeting as well as the ability for members of the public to submit comment via mail or email. The meeting schedule is summarized below, and all comments received are detailed in Table 4 – Citizen Participation Outreach.

06/12/2024 – Housing and Community Development Commission (HCDC) – Public Hearing  
07/10/2024 – Housing and Community Development Commission (HCDC) – Public Hearing  
10/22/2024 – Lake County Human Services PY2025 Grant Workshop  
10/22/2024 – Lake County Affordable Housing PY2025 Grant Workshop  
10/22/2024 – Lake County Public Improvement PY2025 Grant Workshop  
02/07/2025 – Public Services Advisory & Recommendation Committee (ARC)  
02/07/2025 – Affordable Housing Advisory & Recommendation Committee (ARC)  
02/19/2025 – Housing and Community Development Commission (HCDC) – Public Hearing  
02/25/2025 – Behavioral Health Advisory & Recommendation Committee (ARC)  
06/11/2025 – Housing and Community Development Commission (HCDC) – Public Hearing  
06/06/2025-07/06/2025 – Public Comment Period  
09/17/2025 – Housing and Community Development Commission (HCDC) – Public Hearing  
09/15/2025-10/15/2025 – Public Comment Period  
11/12/2025 – Housing and Community Development Commission (HCDC) – Public Hearing  
11/07/2025-12/07/2025 – Public Comment Period

### **5. Summary of public comments**

Details of all the public comments received are included as the “Public Process” attachment to this plan. In additions the comments received are summarized below.:

07/10/2024 – Housing and Community Development Commission (HCDC) – Public Hearing

*Joanna Jaimes of Mano a Mano read her comments on the critical need for the Productive Parents Program. The need for the Productive Parents Program is more pressing than ever. Our community's demand for adult education services is growing at an unprecedented rate. From 2020 to 2024, the number of individuals attending our ESL classes increased by nearly 60%. Similarly, our job readiness training program saw an astonishing 128% increase in participation. These numbers highlight a significant and escalating demand for the services we provide, services that are essential for helping our community members acquire the skills they need to thrive in the workforce.*

*Rob Anthony of Community Partners for Affordable Housing (CPAH) said in terms of the 2025-2029 Consolidated Plan, as you know, the last one prioritized affordable housing, reporting that about thirty percent of homeowners and almost fifty percent of renters were housing cost burdened. Unfortunately, that situation has not changed dramatically. So clearly that lack of affordable housing continues to be one of the biggest problems in the region, which leads to housing instability, financial insecurity, negative impact of physical and mental health, diminished work and school performance.*

*Jennifer Yonan of Youth Conservation Corps (YCC) read the following: This year, YCC is celebrating our 50th year of serving youth in our community. YCC is an education and training program serving Opportunity youth ages 16 – 24 years old who are disconnected from school and from employment We strongly encourage the HCDC's Consolidated Plan for 2025- 2029 to focus on ensuring access to affordable housing and providing public transit for low- and moderate-income families and individuals in Lake County, IL*

*Greg Davenport of North Suburban Legal Aid Clinic said the North Suburban Legal Aid Clinic provides free legal service in the practice areas of housing and domestic violence. The lack of affordable housing leads to many of the clients in cases that we see. We provide support for tenants, so we are working with low-income tenants in the area. We help with eviction matters, tenant and landlord disputes, helping with subsidize housing and vouchers as well too.*

*Allen Swilley of PADS Lake County - Like most counties across the country, homelessness is increasing at an alarming rate, year over year. PADS Lake County is considered the ‘front door to the homeless services system’ and will be on the front lines over the next five years providing services to residents experiencing housing crises. Our data shows that the need for fixed shelter extends beyond the northeast region of the county and should be considered among Lake County decision makers.*

*Pat Davenport of A Safe Place comments: When considering the housing crisis Lake County is experiencing as a whole and how these conditions impact our domestic violence and human trafficking survivors, A Safe Place would like to emphasize the following focus for the county in the next 5 years.*

*Megan Brady, Prairie State Legal Services (PSLS) - The common thread for the current and ongoing needs we see from our community members is a lack of accessible, decent, affordable housing in Lake County. Specifically, PSLS identifies the following needs in our community; Lack of affordable housing; Habitability issues; Need for homelessness prevention programs; Lack of accessible housing for people with disabilities; Barriers to renting because of discriminatory practices; Financial assistance for security deposits, application fees, and moving expenses; and Temporary housing for renters experiencing a gap in housing.*

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

All public comments were accepted.

## **7. Summary**

Lake County's Consolidated Plan will serve as a guide for building affordable housing, supporting the homeless response system, and creating suitable living environments for the Lake County LMI population. The PY2025-29 ConPlan reflects the coordinated efforts of citizens, stakeholders, and partner agencies to achieve the goals in the Consolidated Plan. This work is in support of affirmatively furthering fair housing.

## PR-05 Lead & Responsible Agencies - 91.200(b)

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

The following are the agencies/entities responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source.

CDBG Administrator	LAKE COUNTY	Community Development
HOME Administrator	LAKE COUNTY	Community Development
ESG Administrator	LAKE COUNTY	Community Development

**Table 1 – Responsible Agencies**

### Narrative

Lake County Community Development (LCCD) serves as the entity responsible for the preparation of the Consolidated Plan as well as the administration of CDBG, HOME, and ESG funds. LCCD is a division of the Lake County Planning, Building and Development (PBD) Department of Lake County Government. Direct oversight of LCCD is the responsibility of the Lake County Housing and Community Development Commission (HCDC). The standing County Committee is the Health and Community Services Committee (HCS). The Lake County Board (LCB) has ultimate oversight over program administration, including funding allocations.

### Consolidated Plan Public Contact Information

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

### **1. Introduction**

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

Lake County Community Development is committed to enhancing coordination with all agencies that serve Lake County's residents in need, including those in need of assisted housing or other supportive services. The County coordinated with community partners by collaborating on projects, participating in coalitions, and acting as a funder.

Lake County Community Development has a committed collaboration with the Lake County Coalition for the Homeless (local Continuum of Care), as well as participation in various groups and efforts of community partners to improve services for Lake County's residents. Lake County Community Development staff participate in meetings of the regular governmental and non-governmental health and service agency groups, such as the Lake County Alliance for Human Services and Live Well Lake County. Lake County Community Development plays a critical role in the newly developed Lake County's Attainable Housing Coalition, with the "Kickoff" summit taking place in July 2025.

Lake County consults with each of the three Public Housing Agencies (PHAs) in Lake County during the consultation and writing of the 5-year Consolidated Plan. In addition to these regular communications, special projects often require collaboration between the PHAs and the County. Public Housing Agencies are eligible to apply for CDBG and HOME funding during the annual application round conducted by Lake County Community Development.

As a funder who may provide HOME, CDBG or ESG to assisted housing providers, Lake County maintains regular communications with many of Lake County maintains regular communications with many of Lake County's service agencies that provide assisted housing. Additionally, County staff participate in meetings of government and service agency groups that deal with housing issues, such as the Metropolitan Mayor's Caucus and the Illinois Governor's Conference on Affordable Housing.

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

Community Development staffs the Continuum of Care, so substantial overlap of efforts and coordination do take place.

Lake County Community Development has an extremely collaborative relationship with the Lake County Coalition for the Homeless (the Coalition), the Continuum of Care (CoC) that serves Lake County. Lake County employs the Coalition's CoC Coordinator, Continuum of Care Specialist and HMIS Administrator, who work closely with Lake County Community Development staff and are consulted on all matters related to homelessness. Lake County Community Development also serves as the Coalition's Collaborative Applicant, which is the body that submits funding applications on behalf of the CoC. This relationship supports the work of local agencies and ensures that the planning and funding efforts of the Coalition and the County are strategic and collaborative.

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

Community Development staffs the Continuum of Care, so substantial overlap of efforts and coordination do take place.

Lake County Community Development has an extremely collaborative relationship with the Lake County Coalition for the Homeless (the Coalition), the Continuum of Care (CoC) that serves Lake County. Lake County employs the Coalition's CoC Coordinator, Continuum of Care Specialist and HMIS Administrator, who work closely with Lake County Community Development staff and are consulted on all matters related to homelessness. Lake County Community Development also serves as the Coalition's Collaborative Applicant, which is the body that submits funding applications on behalf of the CoC. This relationship supports the work of local agencies and ensures that the planning and funding efforts of the Coalition and the County are strategic and collaborative.

**2. Agencies, groups, organizations and others who participated in the process and consultations**



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

1	<b>Agency/Group/Organization</b>	City of Zion
	<b>Agency/Group/Organization Type</b>	Other government - Local
	<b>What section of the Plan was addressed by Consultation?</b>	Economic Development
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Community Development staff met with City of Zion staff to discuss the economic development and non-housing community development needs of the City. It is anticipated that the City will continue to engage Lake County Community Development to assist in the implementation of the strategies outlined in the City's Comprehensive Plan.
2	<b>Agency/Group/Organization</b>	Waukegan Housing Authority
	<b>Agency/Group/Organization Type</b>	PHA
	<b>What section of the Plan was addressed by Consultation?</b>	Public Housing Needs
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Community Development staff contacted the Waukegan Housing Authority staff to discuss the potential to collaborate on projects where the goals of the WHA and the goals of the 5-Year Consolidated Plan overlap. The anticipated outcome of this consultation is an increase in rental assistance resources available to low-income Lake County residents with disabilities, improved access to services, and improved coordination between the Waukegan Housing Authority and Lake County Community Development.
3	<b>Agency/Group/Organization</b>	North Chicago Housing Authority
	<b>Agency/Group/Organization Type</b>	PHA
	<b>What section of the Plan was addressed by Consultation?</b>	Public Housing Needs
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Community Development staff corresponded with North Chicago Housing Authority staff to discuss the potential to collaborate on projects where the goals of the NCHA and the goals of the 5-Year Consolidated Plan overlap. The anticipated outcome of this consultation is improved coordination between the North Chicago Housing Authority and Lake County Community Development, which will improve the outcomes of existing programs.

4	<b>Agency/Group/Organization</b>	Lake County Workforce Development
	<b>Agency/Group/Organization Type</b>	Services-Employment
	<b>What section of the Plan was addressed by Consultation?</b>	Economic Development
		Anti-poverty Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	A consultation was held between the Workforce Development, key staff of the organization and Lake County Community Development. Ideas for future collaborations were discussed that will be considered in the future including creating subsidies for individuals seeking employment resources and continued transit assistance to those households until they are self-sufficient in this regard.
5	<b>Agency/Group/Organization</b>	Lake County Health Department
	<b>Agency/Group/Organization Type</b>	Services - Housing
		Services-Children
		Services-Elderly Persons
		Services-Persons with Disabilities
		Services-Persons with HIV/AIDS
		Services-Victims of Domestic Violence
		Services-homeless
		Services-Health
		Health Agency
		Other government - County
	<b>What section of the Plan was addressed by Consultation?</b>	Lead-based Paint Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The Lake County Health Department (LCHD) was consulted on the existing programs for lead poisoning in Lake County. The LCHD provided data on the number of cases investigated and the trends they interpret from the data. Potential outcomes included an improved coordinated effort to target the areas where cases are most common.
6	<b>Agency/Group/Organization</b>	The Alliance for Human Services in Lake County
	<b>Agency/Group/Organization Type</b>	Services - Housing

		Services-Children
		Services-Elderly Persons
		Services-Persons with Disabilities
		Regional organization
		Civic Leaders
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment
		Non-Homeless Special Needs
		Anti-poverty Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	At a convening of non-profit Executive Directors by the Lake County Alliance for Human Services, Lake County Community Development attended an informal focus group on the service needs in the County. There was substantial interest in coordination of services by United Way 211 and the ServicePoint Referral Network. Lack of transportation was mentioned as a barrier to both services and jobs.
7	<b>Agency/Group/Organization</b>	Lake County Municipal League
	<b>Agency/Group/Organization Type</b>	Housing
		Other government - County
		Other government - Local
		Civic Leaders
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment
		Economic Development
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Lake County Community Development consulted with the Lake County Municipal League (LCML). The topics discussed included the potential role for the Lake County Land Bank Authority (LCLBA). It was noted that affordable housing is a natural byproduct of Land Banking activities and that the LCLBA can serve as a redevelopment tool for many of Lake County's vacant and/or distressed properties.
8	<b>Agency/Group/Organization</b>	Antioch Township
	<b>Agency/Group/Organization Type</b>	Other government - Local
		Housing Need Assessment

	<b>What section of the Plan was addressed by Consultation?</b>	Homeless Needs - Chronically homeless
		Homeless Needs - Families with children
		Homelessness Needs - Veterans
		Homelessness Needs - Unaccompanied youth
		Homelessness Strategy
		Market Analysis
		Anti-poverty Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	A meeting was held at the Antioch Public Library District to discuss local homelessness data and community coordination. Attendees included township caseworkers, community-based service providers, and library staff.
9	<b>Agency/Group/Organization</b>	Freemont Township
	<b>Agency/Group/Organization Type</b>	Other government - Local
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment
		Homeless Needs - Chronically homeless
		Homeless Needs - Families with children
		Homelessness Needs - Veterans
		Homelessness Needs - Unaccompanied youth
		Homelessness Strategy
		Non-Homeless Special Needs
		Market Analysis
		Anti-poverty Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	A meeting was held at the Antioch Public Library District to discuss local homelessness data and community coordination. Attendees included township caseworkers, community-based service providers, and library staff.
10	<b>Agency/Group/Organization</b>	Avon Township

	<b>Agency/Group/Organization Type</b>	Other government - Local
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment
		Homeless Needs - Chronically homeless
		Homeless Needs - Families with children
		Homelessness Needs - Veterans
		Homelessness Needs - Unaccompanied youth
		Homelessness Strategy
		Market Analysis
		Anti-poverty Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	A meeting was held at the Antioch Public Library District to discuss local homelessness data and community coordination. Attendees included township caseworkers, community-based service providers, and library staff.
11	<b>Agency/Group/Organization</b>	Lake County Coalition for the Homeless
	<b>Agency/Group/Organization Type</b>	Services - Housing
		Services-Children
		Services-Elderly Persons
		Services-Persons with Disabilities
		Services-Persons with HIV/AIDS
		Services-Victims of Domestic Violence
		Services-homeless
	<b>What section of the Plan was addressed by Consultation?</b>	Homeless Needs - Chronically homeless
		Homeless Needs - Families with children
		Homelessness Needs - Veterans
		Homelessness Needs - Unaccompanied youth
		Homelessness Strategy

	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Lake County's Continuum of Care is housed within Community Development and staffs the Lake County Coalition for the Homeless, enabling close coordination between CoC efforts and broader community initiatives. With shared staffing, the structure supports consistent consultation and strategic planning. The CoC Coordinator reports to the Community Development Administrator and uses HMIS and system performance data to guide funding decisions, identify service gaps, and inform targeted responses to homelessness in Lake County.
12	<b>Agency/Group/Organization</b>	Lake County Division of Transportation
	<b>Agency/Group/Organization Type</b>	Other government - County
	<b>What section of the Plan was addressed by Consultation?</b>	Homelessness Strategy
		Non-Homeless Special Needs
		Market Analysis
		Economic Development
		Anti-poverty Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Representatives of the Lake County Division of Transportation met with Community Development to discuss the County's needs as they relate to transportation and future planning. Plans were discussed to have consulting group work hand-in-hand with County decision makers to use CDBG-PS funding to improve transit in Lake County for low/mod income households. Work in this regard would be done in concert with a recent transit study completed for the County.
13	<b>Agency/Group/Organization</b>	City of North Chicago
	<b>Agency/Group/Organization Type</b>	Other government - Local
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment
		Economic Development
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Multiple one-on-one meetings were held to discuss the City's priority needs and how they could be addressed. The city expressed the needs for funding capital projects including bolstering their aging infrastructure.
14	<b>Agency/Group/Organization</b>	Community Youth Network
	<b>Agency/Group/Organization Type</b>	Services - Housing

		Services-Children
	<b>What section of the Plan was addressed by Consultation?</b>	Homelessness Needs - Unaccompanied youth
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Community Development staff met with Community Youth Network to discuss their priorities and plans for growth. The CYN staff indicated that the organization is interested in expanding and partnering with other youth organizations to better serve youth who need counseling, after school enrichment, and housing. The consultation is expected to improve coordination for services for Lake County youth.
15	<b>Agency/Group/Organization</b>	Mano a Mano Family Resource Center
	<b>Agency/Group/Organization Type</b>	Services-Health
		Services-Education
		Services-Employment
	<b>What section of the Plan was addressed by Consultation?</b>	Non-Homeless Special Needs
		Economic Development
		Anti-poverty Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Mano a Mano representatives provided their input on what they felt Community Development should prioritize in the future in a face-to-face meeting. The growing foreign born and Spanish speaking population in Lake County could benefit from County spending to improve job readiness according to Mano a Mano representatives. Computer skills training, quality childcare and supports for citizenship assistance were also identified as important focusses for funding consideration by the Mano a Mano staff.
16	<b>Agency/Group/Organization</b>	Highland Park Community Nursery School & Day Care Center
	<b>Agency/Group/Organization Type</b>	Services-Children
		Services-Education
		Services-Employment
	<b>What section of the Plan was addressed by Consultation?</b>	Non-Homeless Special Needs
		Economic Development
		Anti-poverty Strategy

	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The Highland Park ED met face-to-face with Community Development representatives to express her organization's concerns for the future and what priorities CD should consider for future planning. The organization has seen an increasing need for subsidized childcare for low/mod income households. As there is increasing need the pre-school suggests that increasing resources to offset the costs not covered elsewhere would ease the burden on these low/mod income households and allow them to support their family via employment.
17	<b>Agency/Group/Organization</b>	Center for Enriched Living
	<b>Agency/Group/Organization Type</b>	Services-Elderly Persons
		Services-Persons with Disabilities
		Services-Employment
	<b>What section of the Plan was addressed by Consultation?</b>	Non-Homeless Special Needs Economic Development
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Representatives from the Center for Enriched Living met face-to-face with Lake County representatives to express their opinion on what the greatest challenges their clients are facing in the community. Investments in employment services for intellectually disabled Lake County residents was identified as a key potential focus for the County. Additionally, needs for mental health services is always present.
18	<b>Agency/Group/Organization</b>	Great Lakes Adaptive Sports Association
	<b>Agency/Group/Organization Type</b>	Services-Persons with Disabilities
	<b>What section of the Plan was addressed by Consultation?</b>	Non-Homeless Special Needs
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Representatives from GLASA met with Lake County representatives to discuss, face-to-face, the priorities they believe the County should include in their upcoming consolidated plan. GLASA representatives expressed needs for additional mental health services and transportation. GLASA staff proposed further investment in disability services such as those provided by GLASA. If service dollars were not possible, then capital investments in equipment would be helpful to the organization.
19	<b>Agency/Group/Organization</b>	Erie Family Health Center Inc.
	<b>Agency/Group/Organization Type</b>	Services-Health



	<b>What section of the Plan was addressed by Consultation?</b>	Non-Homeless Special Needs
		Anti-poverty Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Representatives from Erie's Waukegan facility met face-to-face with Lake County representatives to discuss their organization's future and the needs they see in the community. Their client numbers are growing, and they suggested that continued investment in their behavioral health services will support the growth they're seeing. They have become an efficient provider of counseling and psychiatric services for low/mod income households which is not the case County-wide. Investment in their programs could result in better health outcomes for Lake County's low/mod income residents.
20	<b>Agency/Group/Organization</b>	Prairie State Legal Services
	<b>Agency/Group/Organization Type</b>	Services - Housing
		Services-Victims of Domestic Violence
		Service-Fair Housing
		Services - Victims
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment
		Homeless Needs - Chronically homeless
		Homeless Needs - Families with children
		Homelessness Needs - Veterans
		Homelessness Needs - Unaccompanied youth
		Homelessness Strategy
		Non-Homeless Special Needs

	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Representatives from Prairie State Legal Services (PSLS) expressed the need for affordable housing, accessible housing, lack of healthy nutritious foods, employment and school disparities, especially with special education, as needs in the community. LCCD is facilitating an opportunity for PSLS to meet with potential clients in the courthouse when they are in court facing eviction, helping low-income families gain representation in real time.
21	<b>Agency/Group/Organization</b>	Lake County Housing Authority
	<b>Agency/Group/Organization Type</b>	PHA
	<b>What section of the Plan was addressed by Consultation?</b>	Public Housing Needs
		Homeless Needs - Chronically homeless
		Homeless Needs - Families with children
		Homelessness Needs - Veterans
		Homelessness Needs - Unaccompanied youth
		Homelessness Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Community Development staff met with Lake County Housing Authority staff to discuss the potential to collaborate on projects where the goals of the LCHA and the goals of the 5-Year Consolidated Plan overlap. The anticipated outcome of this consultation is an increase in rental assistance resources available to low-income Lake County residents with disabilities, improved access to services, and improved coordination between the Lake County Housing Authority, the Lake County Coalition for the Homeless, and Lake County Community Development.
22	<b>Agency/Group/Organization</b>	Lake County Funders - Lake County Community Foundation
	<b>Agency/Group/Organization Type</b>	Services & Philanthropy
		Foundation
	<b>What section of the Plan was addressed by Consultation?</b>	Homeless Needs - Chronically homeless
		Homeless Needs - Families with children
		Homelessness Needs - Veterans
		Homelessness Needs - Unaccompanied youth
		Homelessness Strategy

	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Lake County Community Development team members participate in monthly funders call with numerous Lake County members and organizations. During these calls Lake County hears from organizations that share a common interest of improving the quality of life in the Lake County area.
23	<b>Agency/Group/Organization</b>	Lake County Partners
	<b>Agency/Group/Organization Type</b>	Business and Civic Leaders
		Economic Development
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment
		Economic Development
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Lake County staff discussed issues impacting economic development with Lake County Partners (LCP). LCP identified the continued need for investment in housing as housing burden increased across all income levels.
24	<b>Agency/Group/Organization</b>	Live Well Lake County - Lake County Health Department
	<b>Agency/Group/Organization Type</b>	Services - Housing
		Services-Elderly Persons
		Services-Health
		Services-Education
		Services-Employment
		Health Agency
		Publicly Funded Institution/System of Care
		Foundation
		Neighborhood Organization
	<b>What section of the Plan was addressed by Consultation?</b>	Poverty impact on Health Outcomes

	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	This group led by the Lake County Health Department identified health trend disparities in Lake County, where low-income and less educated populations were more likely to suffer from Hypertension, Obesity and Diabetes. Another key observation was a need to strengthen the capacity and infrastructure of behavioral health services.
25	<b>Agency/Group/Organization</b>	Lake County Haven
	<b>Agency/Group/Organization Type</b>	Services – Housing
		Services – Health
	<b>What section of the Plan was addressed by Consultation?</b>	Homeless Needs
		Non-Homeless Special Needs
		Non-Housing Community Development
		Special Needs Facilities and Services
		Barriers to Affordable Housing
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Representative for Lake County Haven expressed challenges for access to mental health services and the time needed to focus on mental health. Linking people to services that are accessible and affordable, specifically psychiatric services is key.
26	<b>Agency/Group/Organization</b>	A Safe Place
	<b>Agency/Group/Organization Type</b>	Services - Housing
		Services-Victims of Domestic Violence
		Services – Victims
	<b>What section of the Plan was addressed by Consultation?</b>	Homeless Needs
		Non-Homeless Special Needs
		Non-Housing Community Development
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Representatives from A Safe Place and representatives from the County meet face-to-face to discuss the needs they are seeing in the community. A Safe Place identified a need for more trauma informed shelters. There is a rise in numbers of people seeking shelter, this is both due to more awareness and additional needs. Navigating McKinney Vento proves challenging for families in the shelter.

27	<b>Agency/Group/Organization</b>	Youth Conservation Corps (YCC)
	<b>Agency/Group/Organization Type</b>	Services – Employment
		Services – Youth
	<b>What section of the Plan was addressed by Consultation?</b>	Non-Homeless Special Needs
		Non-Housing Community Development
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Representatives from Youth Conservation Corps (YCC) and representatives from the County meet face-to-face to discuss the needs they are seeing in the community. YCC identified an increase in homelessness among youth, both from parents turning kids out when they turn 18 and youth choosing to leave their parents home at or before turning 18. Transportation is an ongoing need, these are opportunities to connect with the local public transportation company, PACE, to look at bus routes and avoid some of the areas where gangs are prevalent.
28	<b>Agency/Group/Organization</b>	PADS Lake County
	<b>Agency/Group/Organization Type</b>	Homeless Needs - Chronically homeless
		Homeless Needs - Families with children
		Homelessness Needs - Veterans
		Homelessness Needs - Unaccompanied youth
		Homelessness Strategy
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Needs
		Homeless Facilities
		Barriers to Affordable Housing
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Representatives from PADS Lake County and representatives from the County meet face-to-face to discuss the needs they are seeing in the community. PADS identified a lack of affordable housing. Going forward they feel that PSH will become more necessary. They are anticipating seeing in increase in the homeless population, specifically new people and families. This is likely due to a rise in eviction and the increase cost of living.
29	<b>Agency/Group/Organization</b>	Zacharias Sexual Abuse Center (ZCenter)
	<b>Agency/Group/Organization Type</b>	Services-Victims of Domestic Violence
		Services – Victims

	<b>What section of the Plan was addressed by Consultation?</b>	Non-Homeless Special Needs
		Non-Housing Community Development
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Representatives from ZCenter and representatives from the County meet face-to-face to discuss the needs they are seeing in the community. ZCenter sees a need for family shelters.

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

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Lake County Strategic Plan	Lake County	The Lake County Strategic Plan has the stated objective to “Promote and implement policies and practices that reduce barriers to housing affordability and supply.”
Lake County CEDS	Lake County Partners	The Lake County CEDS has the stated strategy to “Increase the number of housing units (owner occupied and rental) across the spectrum of affordability and density.”
Lake County CHIP	Lake County Health Dept.	The Lake County CHIP s, the coalition identified the following three priority areas for action: Access to Care, Education, and Housing.

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

### Narrative

Lake County intentionally leverages the data and research in other communitywide efforts. In many cases, Lake County Community Development staff were involved in the community advisory aspects of the reports.

## AP-12 Participation - 91.401, 91.105, 91.200(c)

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

Public notices for all public hearings related to the Consolidated Plan were published local newspapers. In addition, advisory emails were sent to non-profit and municipal organizations advertising public meetings, soliciting input and inviting in-person consultations related to the Consolidated Plan.

The citizen participation process was critical to identify existing strengths and needs, increasing community knowledge and awareness, reinforce and establish partnerships, align available resources and allow for community buy-in and support for the plan.

### Citizen Participation Outreach

Table 4 – Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
1	newspaper	non-targeted/ broad community	notice of public hearing on June 12, 2024, published May 29, 2024	none	none	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
2	newspaper	non-targeted/ broad community	notice of public hearing on July 10, 2024, published July 3, 2024	comments made at July 10, 2024, public meeting		
2-1	Public meeting	non-targeted/ broad community	public meeting Housing and Community Development Commission (HCDC) July 10, 2024	Joanna Jaimes of Mano a Mano commented on the critical need to provide comprehensive, linguistic, and culturally competent services to meet the needs of our ever-growing population. Their Productive Parent Program provides services that are essential for helping our community members acquire the skills they need to thrive in the workforce.	None	<a href="https://www.lakecountyil.gov/DocumentCenter/View/83336/2024-07-10-HCDC-Meeting-Minutes">https://www.lakecountyil.gov/DocumentCenter/View/83336/2024-07-10-HCDC-Meeting-Minutes</a>



Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
2-2	Public meeting	non-targeted/ broad community	public meeting HCDC July 10, 2024	Rob Anthony of Community Partners for Affordable Housing (CPAH) reported that about thirty percent of homeowners and almost fifty percent of renters were housing cost burdened. Lake County Partners reported that 75% of renters with incomes under 50,000 dollars are living in housing that is unaffordable, it also concluded that there were 1,200 more housing units needed for Seniors, and 6,700 more units needed for families by 2027. The Illinois Housing Development Authority identifies communities across the state that has less than ten percent of their housing stock as affordable, and those are called non-exempt communities under the Illinois Affordable Housing Planning and Appeals Act.	None	<a href="https://www.lakecountyl.gov/DocumentCenter/View/83336/2024-07-10-HCDC-Meeting-Minutes">https://www.lakecountyl.gov/DocumentCenter/View/83336/2024-07-10-HCDC-Meeting-Minutes</a>

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
2-3	Public meeting	non-targeted/ broad community	public meeting HCDC July 10, 2024	Jennifer Yonan of Youth Conservation Corps (YCC) stated that YCC has been serving youth in our community for 50 years to provide an education and training program serving youth ages 16 – 24 years old who are disconnected from school and from employment. They help the young adults in our program earn their high school diploma or GED, teach life skills, leadership development and workforce readiness skills.	None	<a href="https://www.lakecountyl.gov/DocumentCenter/View/83336/2024-07-10-HCDC-Meeting-Minutes">https://www.lakecountyl.gov/DocumentCenter/View/83336/2024-07-10-HCDC-Meeting-Minutes</a>
2-4	Public meeting	non-targeted/ broad community	public meeting HCDC July 10, 2024	Greg Davenport of North Suburban Legal Aid Clinic provides free legal service in the practice areas of immigration, housing, domestic violence. Their program provides support for low-income tenants' eviction matters, tenant and landlord disputes, helping with subsidize housing and vouchers.	None	<a href="https://www.lakecountyl.gov/DocumentCenter/View/83336/2024-07-10-HCDC-Meeting-Minutes">https://www.lakecountyl.gov/DocumentCenter/View/83336/2024-07-10-HCDC-Meeting-Minutes</a>

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
2-5	Public meeting	non-targeted/ broad community	public meeting HCDC July 10, 2024	Allen Swilley of PADS Lake County stated homelessness is increasing at an alarming rate, year over year. PADS Lake County is considered the 'front door to the homeless services system' and will be on the front lines providing services to residents experiencing housing crises. Lake County must continue to develop resilient assets that can respond to the entrenched nature of homelessness. The leveraging of new durable social assets, like fixed shelters, coupled with an ecosystem of resources and programs, will change the landscape of homelessness in our community and ensure the county has a robust and healthy homeless response system.	None	<a href="https://www.lakecountyl.gov/DocumentCenter/View/83336/2024-07-10-HCDC-Meeting-Minutes">https://www.lakecountyl.gov/DocumentCenter/View/83336/2024-07-10-HCDC-Meeting-Minutes</a>

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
2-6	Public meeting	non-targeted/ broad community	public meeting HCDC July 10, 2024	Pat Davenport of A Safe Place commented when considering the housing crisis, they must come up with a progressive and aggressive plan for victims of domestic violence and human trafficking. Under the First Housing Policy, which prioritizes placing survivors in a home immediately however the reality in our County and the way the economy, housing shortage, and financial barriers they face makes it almost impossible to house someone in a safe environment right away.	None	<a href="https://www.lakecountyl.gov/DocumentCenter/View/83336/2024-07-10-HCDC-Meeting-Minutes">https://www.lakecountyl.gov/DocumentCenter/View/83336/2024-07-10-HCDC-Meeting-Minutes</a>

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
2-7	Public meeting	non-targeted/ broad community	public meeting HCDC July 10, 2024	<p>Megan Brady of Prairie State Legal Services (PSLS) offers no-cost civil legal services to the elderly, disabled, low income, and otherwise vulnerable residents of Lake County. We work with tenants and homeowners on a variety of housing issues including evictions, subsidized housing concerns, foreclosure, housing discrimination, housing conditions issues, and accommodations to help individuals with disabilities remain housed. PSLS identifies the following needs in our community:</p> <ul style="list-style-type: none"> <li>• Lack of affordable housing;</li> <li>• Habitability issues;</li> <li>• Need for homelessness prevention programs;</li> <li>• Lack of accessible housing for people with disabilities;</li> <li>• Barriers to renting because of discriminatory practices;</li> <li>• Financial assistance for security deposits, application fees, and moving expenses; and</li> <li>• Temporary housing for renters experiencing a gap in housing.</li> </ul>	None	<a href="https://www.lakecountyil.gov/DocumentCenter/View/83336/2024-07-10-HCDC-Meeting-Minutes">https://www.lakecountyil.gov/DocumentCenter/View/83336/2024-07-10-HCDC-Meeting-Minutes</a>

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
3	Public meeting	non-targeted/ broad community	public meeting HCDC August 14, 2024	Joel Williams of Habitat for Humanity Lake County, a developer of affordable homeownership solutions, commented that they are building 8 single family homes that will be owner-occupied by households making less than 80% of the Area Median Income and hope to continue to grow the number of homes they build each year. Communities of need are often far below the average homeownership rate, and opportunities for individuals and families to become homeowners are becoming increasingly more difficult. When you consider the lack of opportunities for households of color, the need becomes even more apparent. Historic systemic inequities, including racist lending practices, redlining, and countless other issues, mean that the opportunity to become a homeowner is seemingly impossible for far too many people.	None	<a href="https://www.lakecountyl.gov/DocumentCenter/View/83337/2024-08-14-HCDC-Meeting-Minutes">https://www.lakecountyl.gov/DocumentCenter/View/83337/2024-08-14-HCDC-Meeting-Minutes</a>

## Expected Resources

### **AP-15 Expected Resources - 91.420(b), 91.220(c)(1,2)**

#### **Introduction**

The identified resources include Program Year 2025 (PY25) entitlement funds, program income and unallocated prior year funds.

Prior year funds include:

PY2020 - \$24,333 HOME

PY2023 - \$8,766 CDBG

PY2024 - \$134,857 CDBG

#### **Anticipated Resources**

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan	Narrative Description
			Annual Allocation:	Program Income:	Prior Year Resources:	Total:		
<b>CDBG</b>	<b>Federal - HUD</b>	See Table 59a	\$2,890,601	<del>\$85,480</del> \$90,440	\$167,956	<del>\$3,144,037</del> \$3,148,997	\$11,562,404	CDBG funds will be used to support Community development in Lake County's target areas and to support affordable housing efforts throughout Lake County.
<b>HOME</b>	<b>Federal - HUD</b>	See Table 59a	\$1,463,749	<del>\$167,957</del> \$241,407	\$0	<del>\$1,631,705</del> \$1,705,156	\$5,854,994	HOME funds will be used to develop affordable housing for low-income communities, including new construction and rehabilitation of single- and multi-family units
<b>ESG</b>	<b>Federal - HUD</b>	See Table 59a	\$221,534	\$0	\$0	\$221,534	\$886,136	ESG funds will be used to assist persons experiencing homelessness with outreach, shelter services and rapid rehousing services.

**Table 2 - Expected Resources – Priority Table**



<u>Funding Source</u>		
CDBG	HOME	ESG
<ul style="list-style-type: none"> <li>• Acquisition</li> <li>• Admin and Planning</li> <li>• Economic Development</li> <li>• Housing</li> <li>• Public Improvements</li> <li>• Public Services</li> </ul>	<ul style="list-style-type: none"> <li>• Acquisition</li> <li>• Homebuyer assistance</li> <li>• Homeowner rehab</li> <li>• Multifamily rental new construction</li> <li>• Multifamily rental rehab</li> <li>• New construction for ownership</li> <li>• TBRA</li> </ul>	<ul style="list-style-type: none"> <li>• Conversion and rehab for transitional housing</li> <li>• Financial Assistance</li> <li>• Overnight shelter</li> <li>• Rapid re-housing (rental assistance)</li> <li>• Rental Assistance</li> <li>• Services <ul style="list-style-type: none"> <li>• Transitional housing</li> </ul> </li> </ul>

Table 59a

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

The CDBG Program does not require matching funds, however Lake County incentivizes outside investment during the CDBG application process. Project applications are scored based on their ability to attract outside investment and the amount of leveraged funding provided in the budget.

The ESG Program regulations require 100% match. This requirement is met through local funds (Lake County Affordable Housing fund) and private funds. Most ESG-funded projects also receive State dollars for ongoing service and operations costs.

The HOME Program regulations require a 25% match. Match requirements are met by developer contributions, municipal investments, local fundraising, bank financing, First Time Home Buyer grants, and State of Illinois affordable housing funds.

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

Lake County works closely with all municipalities located within the geographic boundaries. It is anticipated the funding covered under this plan could be used to support publicly owned land to address the affordable housing needs of Lake County. An example would be the partnership with a municipality to utilize CDBG funds to support the demolition of a dilapidated structure. The funding would alongside a deed restriction limiting future use to affordable housing.

## Annual Goals and Objectives

### AP-20 Annual Goals and Objectives - 91.420, 91.220(c)(3)&(e)

#### Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Maximize Affordable Housing	2025	2026	Affordable Housing	Countywide	Increasing affordable housing supply	CDBG: <del>\$913,071</del> \$839,621  HOME: <del>\$1,485,330</del> \$1,558,780	Direct Financial Assistance to Homebuyers: 15  Homeowner Housing Added: 21  Homeowner Housing Rehabilitated: 15  Public service activities other than low/mod income housing benefit: 101  Rental units constructed: 73  Rental units rehabilitated: 229
2	Improve Homeless Crisis Response System	2025	2026	Homeless	Countywide	End Homelessness in Lake County	CDBG: \$176,015  ESG: \$204,919	Rental units rehabilitated: 15  Public service activities other than low/mod income housing benefit: 1330

<b>3</b>	<b>Enhance the Living Environment for the Lake County LMI Population</b>	2025	2026	Community Development	Countywide	Improving infrastructure serving LMI residents  Expanding the capacity of the service provider network	CDBG: \$1,433,411	Public service activities other than low/mod income housing benefit: 2664  Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 28130
<b>4</b>	<b>Program Administration</b>	2025	2026	Program Administration	Countywide	Program Administration	CDBG: \$578,120 HOME: \$146,375 ESG: \$16,615	Other: 5 Other

### Goal Descriptions

<b>1</b>	<b>Goal Name</b>	<b>Maximize Affordable Housing</b>
	<b>Goal Description</b>	To provide a decent home and suitable living environment for low-and moderate-income households by preserving and expanding Lake County's affordable housing stock through acquisition, rehabilitation, new construction, and rental assistance activities.
<b>2</b>	<b>Goal Name</b>	<b>Improve Homeless Crisis Response System</b>
	<b>Goal Description</b>	Lake County is prioritizing investments into improving the entirety of the Homeless Response System.

		<p style="text-align: center;">Homeless Crisis Response System</p> <p>All components of the system (excluding “Unsubsidized Housing”) are eligible for funding under this ConPlan and it is the intent to invest the maximum amount funding allowable under regulatory limits.</p>
3	Goal Name	Enhance the Living Environment for the Lake County LMI Population
	Goal Description	Activities funded under this goal are designed to directly serve the low and moderate income (LMI) population of Lake County. A focus will be on accessibility improvement to public facilities, infrastructure improvements in LMI census tracts, and funding for service agencies serving the Lake County residents meeting the HUD low and moderate clientele (LMC) presumed benefit definition.
4	Goal Name	Program Administration

	<b>Goal Description</b>	Each source of HUD funding (CDBG, HOME, ESG) provides funding for planning and administration of these grant programs, which are managed by Lake County Community Development Program administration.
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## AP-35 Projects - 91.420, 91.220(d)

### Introduction

#	Project Name
1	Owner Occupied Rehabilitation
2	Down Payment Assistance
3	Acquisition of Affordable Rental Housing
4	New Construction - Rental
5	Rehabilitation of Affordable Rental Housing
6	New Construction - Homebuyer
7	Affordable Housing Rehabilitation and Resale
8	CHDO Operating
9	Public Services
10	Facility Improvements - Special Needs
11	Public Facilities and Infrastructure
12	Program Administration

**Table 3 – Project Information**

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

Allocation priorities are primarily a function of the scoring of the applications received from community partners. Scoring criteria was formulated from the priority needs and goals identified during the consultation process and how well each potential project addresses those needs/goals. The amount of funding that can be made available represents the main obstacle to addressing underserved needs.

The amount of funding requested received by Lake County consistently exceeds the amount funds that can be made available.

**AP-38 Project Summary**  
**Project Summary Information**



Project Name	Target Area	Goals Supported	Needs Addressed	Funding	Description	Target Date	Estimate the number and type of families that will benefit from the proposed activities	Location Description	Planned Activities
Owner Occupied Rehabilitation		Maximize Affordable Housing	Increasing affordable housing supply	CDBG: \$253,071 HOME: \$266,402	Owner Occupied Rehabilitation	April 30, 2026		Countywide	<ul style="list-style-type: none"> <li>Community Partners for Affordable Housing \$253,071</li> <li>City of Waukegan \$266,402</li> </ul>
Down Payment Assistance		Maximize Affordable Housing	Increasing affordable housing supply	CDBG: <del>\$200,000</del> \$127,257 HOME: \$72,743	Down Payment Assistance	April 30, 2026		Countywide	<ul style="list-style-type: none"> <li>Community Partners for Affordable Housing \$200,000</li> </ul>
Acquisition of Affordable Rental Housing		Maximize Affordable Housing	Increasing affordable housing supply	CDBG: \$491,031	Acquisition of Affordable Rental Housing	April 30, 2026		TBD	<ul style="list-style-type: none"> <li>Clearbrook \$200,000- CILA</li> <li>Community Partners for Affordable Housing \$291,031 CILA</li> </ul>
New Construction - Rental		Maximize Affordable Housing	Increasing affordable housing supply	HOME: \$775,000	New Construction - Rental	April 30, 2026		Village of Gurnee City of Waukegan	<ul style="list-style-type: none"> <li>Northpointe Development \$400,000</li> <li>Rhizome Development \$375,000</li> </ul>
Rehabilitation of Affordable Rental Housing		Maximize Affordable Housing	Increasing affordable housing supply	CDBG: \$46,580 HOME: \$149,109	Rehabilitation of Affordable Rental Housing	April 30, 2026		Village of Wauconda Village of Lake Bluff	<ul style="list-style-type: none"> <li>Full Circle Communities \$149,109</li> <li>A Safe Place \$46,580</li> </ul>
New Construction - Homebuyer		Maximize Affordable Housing	Increasing affordable housing supply	HOME: \$254,819	New Construction - Homebuyer	April 30, 2026		City of Lake Forest	<ul style="list-style-type: none"> <li>Community Partners for Affordable Housing \$254,819</li> </ul>

Affordable Housing Rehabilitation and Resale		Maximize Affordable Housing	Increasing affordable housing supply	CDBG: <del>\$550,000</del> \$627,703	Affordable Housing Rehabilitation and Resale	April 30, 2026		City of Highland Park  Countywide	<ul style="list-style-type: none"><li>• CCHI \$350,000</li><li>• Community Partners for Affordable Housing \$200,00</li><li>• YCC \$77,703</li></ul>
CHDO Operating		Maximize Affordable Housing	Increasing affordable housing supply	HOME: \$50,000	CHDO Operating	April 30, 2026		Countywide	<ul style="list-style-type: none"><li>• Community Partners for Affordable Housing \$50,00</li></ul>

Public Services		Improve Homeless Crisis Response System  Enhance the Living Environment for the Lake County LMI Population	Improving infrastructure serving LMI residents  Expand capacity of the service provider network	ESG: \$204,919  CDBG: \$433,590	Public Services	April 30, 2026		Countywide	<ul style="list-style-type: none"><li>• A Safe Place \$20,000 – Shelter</li><li>• Lake County Community Development \$30,000 - HMIS</li><li>• Kids Above All \$30,000 – Rapid Rehousing</li><li>• Lake County Haven \$20,000 – Shelter</li><li>• PADS Lake County \$47,320 - Shelter</li><li>• PADS Lake County \$61,485 - Intake</li><li>• PADS Lake County \$21,999 – Prevention and Diversion</li><li>• PADS Lake County \$77,000 – Outreach</li><li>• AAHAA \$15,000 – Healthcare Services</li><li>• Center for Enriched Living \$25,000 – Employment Services</li><li>• Eldercare \$20,000 – Transportation Services</li><li>• GLASA \$16,000 - Transportation Services</li><li>• Mano a Mano \$30,000 – Productive Parents Program</li><li>• NSLAC \$20,000 – Legal Services</li><li>• PADS Lake County \$26,550 – Transportation Services</li><li>• Prairie State Legal Services \$85,000 – Fair Housing</li><li>• Prairie State Legal Services \$35,385 – Housing Advocacy</li><li>• Youth Conservation Corps. \$32,000 – Youthbuild</li><li>• Zacharias Center \$15,385 – Youth Counseling</li><li>• Northern Illinois Food Bank \$5,000 – Food Bank</li><li>• Youthbuild Lake County \$5,385 -</li></ul>
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									Youthbuild
Facility Improvements - Special Needs		Enhance the Living Environment for the Lake County LMI Population	Improving infrastructure serving LMI residents	CDBG: \$322,470	Facility Improvements – Special Needs	April 30, 2026		Countywide	<ul style="list-style-type: none"> <li>• Allendale \$47,470</li> <li>• Lambs Farm \$125,000</li> <li>• Nicasa \$150,000</li> </ul>
Public Facilities and Infrastructure		Enhance the Living Environment for the Lake County LMI Population	Improving infrastructure serving LMI residents  Expand capacity of the service provider network	CDBG: \$269,175	Public Facilities and Infrastructure	April 30, 2026		City of North Chicago  City of Zion	<ul style="list-style-type: none"> <li>• City of North Chicago \$169,175 – Sewer Lining</li> <li>• City of Zion \$100,000 – Sidewalk Replacement</li> </ul>
Program Administration		Program Administration	End Homelessness in Lake County  Improving infrastructure serving LMI residents  Increasing affordable housing supply  Expand capacity of the service provider network	CDBG: \$578,120  HOME: \$146,375  ESG: \$16,615	Program Administration	April 30, 2026		Countywide	<ul style="list-style-type: none"> <li>• Lake County Community Development \$741,110</li> </ul>



## **AP-50 Geographic Distribution - 91.420, 91.220(f)**

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

### **Geographic Distribution**

<b>Target Area</b>	<b>Percentage of Funds</b>
Fox Lake Area	0
High Opportunity Areas	23
North Chicago Area	4
Round Lakes Area	0
Waukegan Area	10
Zion Area	9

**Table 4 - Geographic Distribution**

### **Rationale for the priorities for allocating investments geographically**

According to the 2019-2023 American Community Survey 5-Year Estimates, the areas listed above had a median income below the HUD income limit for a four-member household. This is strong indicator that families in these areas would be ideal candidates to receive HUD assistance. The geographic percentages for North Chicago and Waukegan reflect the partnership with Lake County (through an official Joint-Agreement among the three municipalities) to coordinate each municipalities' respective entitlement funds. The title of "High Opportunity Areas" refers to communities where beneficial social and economic factors enable greater upward economic mobility. Investing in affordable units located in High Opportunity Areas maximizes the benefit to low- and moderate-income families.

### **Discussion**

The Chicago Metropolitan Agency for Planning (CMAP) promotes inclusive growth, resilience, and prioritized investment in its On To 2050 report. Prioritized investments at the local area increases coordination across all local impacted agencies and helps increase local participation.

## Affordable Housing

### AP-55 Affordable Housing - 91.420, 91.220(g)

#### Introduction

One Year Goals for the Number of Households to be Supported	
Homeless	33
Non-Homeless	306
Special-Needs	47
Total	353

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

One Year Goals for the Number of Households Supported Through	
Rental Assistance	33
The Production of New Units	89
Rehab of Existing Units	249
Acquisition of Existing Units	15
Total	353

Table 6 - One Year Goals for Affordable Housing by Support Type

#### Discussion

Homeless households are assisted explicitly through rapid rehousing and tenant based rental assistance. Non-homeless households will be supported by owner-occupied rehabilitation, down payment assistance, homelessness prevention, the construction of new rental units, and acquisition/rehab/resale. While intake guidelines may or may not track homeless status at point of participation, it is assumed that some acquisition and rehab projects will assist households otherwise at risk of homelessness.

## **AP-60 Public Housing - 91.420, 91.220(h)**

### **Introduction**

Public housing and Housing Choice Voucher (HCVs) are essential tools for addressing the affordable housing needs of low-income individuals and families in Lake County, including the cities of Waukegan and North Chicago. The Lake County Housing Authority (LCHA) serves as the primary public housing agency (PHA) for most of Lake County, including unincorporated area and municipalities. Waukegan Housing Authority (WHA) and North Chicago Housing Authority (NCHA) independently operate public housing and voucher programs within in their respective communities.

These three housing authorities work to provide decent, safe and affordable housing to vulnerable populations, including seniors, individuals with disabilities and families with children.

Lake County and its municipal partners remain committed to working with LCHA, WHA, NCHA and other stakeholders to preserve existing public housing, reduce concentrations of poverty, and promote access to affordable housing opportunities and supportive services throughout the region.

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

LCHA housing continues to make significant progress with it's Section 18/Demo Disposition Program with the disposition of approximately 42 of 161 scattered site public housing unit. The units are sold to either the families currently residing in the unit or to affordable housing providers effectively ensuring continued housing affordability. Waukegan Housing Authority is currently working on the renovation of the Ravine Terrace public housing development using the U.S. Department of Housing and Urban Development's Rental Assistance Demonstration (RAD) Program. The Waukegan Housing Authority is expected to start the RAD conversion of Harry Poe Manor in late 2025.

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

Lake County Housing Authority (LCHA)

LCHA maintains a Resident Advisory Board (RAB) compiled of current public housing and housing voucher choice program participants. The RAB reviews and comments on LCHA's Annual and Five-Year Plans, provides feedback on policies, procedures and capital improvements and represents resident interest in planning and decision-making processes. During Lake County Housing Authority's PY2025 program period, the housing authority intends to pursue the development of the Housing Voucher Choice Homeownership Program which would allow Housing



Voucher Choice holders to use their vouchers toward mortgage payments instead of rent creating long term housing stability for those participants.

LCHA also offers a comprehensive Housing Counseling Program aimed at promoting homeownership among its residents. This program provides free, expert guidance to all Lake County residents, regardless of income by HUD certified housing counselors.

#### Waukegan Housing Authority (WHA)

WHA maintains a Resident Council which primarily focuses on administering social programs for residents and the council serves as a platform for residents to engage in community activities and express their needs. In addition, the WHA maintains a Resident Advisory Board (RAB) which provides residents with a forum to share information about the WHA's Annual Plan and make recommendations for its development. To promote homeownership WHA administers the Family Self Sufficiency Program that helps voluntary participants increase their earned income and develop financial independence. The program goals include education, employment, job training, financial literacy and homeownership counseling.

The efforts of the Lake County housing authorities show a clear commitment to not just providing housing, but also fostering resident leadership, economic mobility and long-term housing stability.

## **AP-65 Homeless and Other Special Needs Activities - 91.420, 91.220(i)**

### **Introduction**

Lake County works in close collaboration with the Lake County Coalition for the Homeless to ensure a responsive and coordinated homeless crisis response system that effectively serves individuals and families experiencing or at risk of homelessness. This system is designed to quickly engage those in need and connect them to appropriate housing and supportive services.

The Lake County Coalition for the Homeless manages the Coordinated Entry system, which helps streamline access to resources across multiple entry points. These entry points include emergency shelters, street outreach teams, mainstream service providers, and other community agencies. When individuals or households make initial contact through any of these access points, they are promptly connected to the services that best meet their needs.

Individuals facing literal homelessness are added to the Coordinated Entry By-Name List, where they are assessed and prioritized for housing interventions such as permanent supportive housing, rapid rehousing, or other subsidized housing options. Those at risk of becoming homeless are directed to Homelessness Prevention programs, which provide targeted support to stabilize their housing situation. Many of these services prioritize vulnerable populations, including individuals experiencing chronic homelessness and veterans.

Looking ahead, Lake County remains committed to supporting a network of partner agencies that deliver both access point and housing services. Over the next year, the County will continue to fund and coordinate with these organizations to strengthen the system and ensure that the needs of vulnerable residents are met with timely and appropriate support.

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

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

Over the next year, Lake County will strengthen its response to homelessness by expanding Street Outreach and improving shelter options. Case managers at homeless service agencies, including shelters, play a key role in helping individuals meet their unique needs. For people experiencing unsheltered homelessness, outreach staff go directly into the community to connect with individuals, assess their situations, and link them to services. This hands-on approach has produced strong results, even with limited staff. To build on that success, Lake County will increase the capacity of the PADS Street Outreach Team and adopt a Housing-Focused Street Outreach model. This approach focuses on building

relationships, conducting mobile assessments like the VI-SPDAT, and working closely with behavioral health providers, law enforcement, and community organizations.

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

In partnership with PADS Lake County, Lake County is also transforming its shelter system. A major effort is underway to renovate the former Travelodge hotel into a year-round emergency shelter for families. This new shelter will offer consistent, stable housing along with easier access to case management and housing services. Lake County also understands the importance of having a similar shelter option for adult-only households, especially single individuals who are often left out of traditional shelter models. The County will continue to support efforts to identify a suitable location and bring together the resources needed to serve this population effectively.

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

Lake County remains committed to strengthening the homeless crisis response system by ensuring individuals and families are quickly connected to the most appropriate housing resources, such as permanent supportive housing (PSH), rapid rehousing, or other subsidized options. These efforts are especially focused on vulnerable subpopulations, including individuals experiencing chronic homelessness, veterans, and youth. To improve outcomes, system performance metrics are regularly reviewed to reduce returns to homelessness and shorten the time individuals spend without stable housing. At the same time, Lake County continues to build partnerships and invest in the expansion of affordable housing, with an emphasis on units dedicated to households experiencing homelessness.

In the coming year, Lake County will deepen its focus on Youth Homelessness. Allendale will be added as a Coordinated Entry site within the Homeless Management Information System (HMIS), improving access and data integration for youth-focused services. In partnership with the Lake County Coalition for the Homeless (LCCH), the Continuum of Care (CoC) will also launch a dedicated work group to address Youth Homelessness and coordinate targeted strategies. Additionally, Community Development is actively working to expand PSH capacity. A local cohort is currently participating in a PSH initiative led by the Corporation for Supportive Housing (CSH), aimed at building the infrastructure and expertise needed to increase sustainable PSH options.

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

Lake County's homeless crisis response system relies on strong partnerships and coordinated referral pathways to identify and support households at risk of homelessness before they lose housing. Homelessness prevention programs are a critical part of this effort, providing timely support that helps stabilize households and keep them in permanent housing. Over the next year, Lake County will continue to fund and support prevention services that address a range of risk factors contributing to housing instability. This includes legal advocacy services provided by Prairie State Legal Services and North Suburban Legal Aid Clinic, which help tenants navigate housing challenges and avoid eviction.

Individuals exiting institutions such as hospitals, mental health facilities, foster care, or the criminal justice system are at increased risk of experiencing homelessness without proper discharge planning. To address this, the CoC partners with the Illinois Department of Children and Family Services (DCFS) and the Lake County Health Department to ensure coordination and early connection to housing and support services. These partnerships help strengthen referral pathways and reduce gaps in care.

To further strengthen early intervention efforts, Lake County will continue building partnerships and improving coordination between government agencies and nonprofit providers serving low-income residents. A key initiative for the upcoming year is the creation of a Prevention and Diversion Workgroup in collaboration with LCCH and the CoC. This workgroup will focus on developing strategic solutions to enhance prevention efforts and streamline connections to services for those at risk.

## **Discussion**

Lake County addresses the needs of households experiencing homelessness and those at risk by operating at both the system and agency levels. Efforts are focused on strengthening service delivery through continuous improvement, with funding aligned to respond to identified needs. Regular assessment ensures that resources are prioritized to achieve the greatest possible impact for residents.

The County also continues to make progress through its involvement in Built for Zero, a national initiative led by Community Solutions. Through collaborative leadership within the Continuum of Care, Lake County is implementing data-informed strategies that aim to reduce the number of individuals experiencing homelessness and shorten the duration of their homelessness.



## **AP-75 Barriers to affordable housing - 91.420, 91.220(j)**

### **Introduction**

In Lake County several factors hinder the availability of affordable housing and residential investment. The factors include high land and construction costs, restrictive zoning and land use regulations, and lack of financial support for affordable housing development. Many municipalities within the County maintain zoning codes that limit or prohibit affordable housing development through single-family only zoning, large minimum lot sizes and height and density caps that prohibit or discourage multifamily and affordable housing developments. Large minimum lot requirements and low-density zoning increases the cost per unit of land acquisition and reduces financial feasibility of affordable development, especially in high-opportunity areas. Delays created by local development approvals such as plan reviews, public hearings, and lengthy approval timelines often hinder affordable housing projects which are time sensitive due to funding source requirement. The lack of zoning incentives, tax abatements and expedited permitting that support affordable housing is prohibitive when market-rate housing is more profitable for developers. Some municipalities impose impact fees and other cost prohibitive fees that disproportionately affect affordable housing developments. Due to zoning, fee structures and slow permitting timelines, developers face lower profit margins and longer development horizons. Without offsetting incentives, the return on investment is often too low to attract and retain affordable housing developers. To overcome these barriers zoning reform, incentives, improved approval process, community education and a stronger coordination among local authorities to ensure affordable housing development is prioritized and align land use policies with affordable housing goals.

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

### **Strategy to Remove or Ameliorate the Barriers to Affordable Housing**

To address these barriers and support the development of a broader range of housing options, Lake County will implement the following strategies:

#### **1. Zoning Reform and Technical Assistance**

- o Lake County has partnered with Chicago Metropolitan Agency for to implement a 12-month technical assistance process which will convene Housing Task Force comprising of municipalities across Lake County to evaluate tools and resources to address

housing challenges, culminating in step-by-step Housing Ready toolkits. This effort aims to promote model zoning codes that reduce minimum lot sizes and eliminate exclusionary practices.

**2. Incentivize Affordable Housing Development**

- Lake County offers an Affordable Housing Tax Credit in accordance with a state-level tax incentive program in an effort to create and preserve affordable housing. This credit offers a reduction in assessed value for affordable housing development and rehabilitation.
- Explore and advocate for the implementation of local tax abatements, density bonuses, and reduced or waived development fees for projects that include affordable units.

**3. Streamline Development Processes**

- Work with local governments to streamline approval processes for affordable housing through pre-approved site plans, expedited permitting, and administrative reviews where feasible.

**4. Promote Community Education and Engagement**

- Launch a public education campaign to address misconceptions about affordable housing and highlight its benefits to community stability and economic growth.
- Engage residents early in the planning process to build support and reduce resistance.

**5. Foster Interjurisdictional Collaboration**

- Facilitate regional planning efforts and shared best practices among municipalities to promote consistent affordable housing strategies and align land use policies with housing needs.
- Support joint applications for funding and collaborative development efforts.

**6. Monitor and Evaluate Progress**

- Track changes in local policies and development outcomes to assess the impact of reform efforts.
- Provide regular reporting to stakeholders and adjust strategies as needed to ensure continued progress toward housing affordability goals.

## **AP-85 Other Actions - 91.420, 91.220(k)**

### **Introduction**

#### **Actions planned to address obstacles to meeting underserved needs**

Lake County will continue to address the obstacles to meeting the needs of the underserved communities. The application process prioritizes projects with high amounts of leverage and collaborative impact rather than duplicating services. The plan supports critical safety net programs outside of the CDG public services cap by investing in social services facilities improvements and affordable housing developments that help special needs populations.

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

Lake County will invest in improving the existing affordable housing stock and expand creation of new affordable housing units. Lake County partners with service providers with capacity to engage homeowners and provide cost-effective financial products to help households age in place. Lake County also partners with developers whose model leverages affordable capital to be able to pass on cost-savings into the production of affordable housing units.

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

Lake County shall continue to work with the Illinois Department of Public Health (IDPH) and its Childhood Lead Prevention Program to reduce lead-based paint hazards. Lake County will continue to utilize CDBG and HOME programs in response to lead-based paint contamination.

Lake County will continue to include lead-based paint evaluations in its existing housing programs; primarily as part of the Owner-Occupied Rehabilitation Program (OORP). The application process includes providing prospective clients a copy of the USEPA brochure, "The Lead-Safe Certified Guide to Renovate Right". Residences built prior to 1978 receive a lead-based paint inspection by a State of Illinois-certified professional. A report is prepared identifying the existence of and condition of any/all surfaces within the home containing lead-based paint. Applicants participating in the OORP receive a copy of the report. The OORP includes the remediation of LBP hazards by U.S. EPA certified contractors. All contractors must be certified lead renovators and the company must be registered as a firm by the U.S. EPA. A clearance report and LBP Free certificate is included in the required documentation for OORP households where LBP has been identified.

As per Federal Regulations found at 24 CFR Part 35, specific thresholds are followed to determine the protective hazard reduction requirement for each project that has been assisted with HOME and/or



CDBG funding.

- Acquisition/Leasing - Visual Assessment
- Rehabilitation receiving up to and including \$5,000 per unit - Paint testing – Stabilization
- Rehabilitation receiving more than \$5,000 - \$25,000 per unit - Identify and address lead-based paint hazards - Implement interim controls.
- Rehabilitation receiving over \$25,000 - Identify and eliminate lead-based paint hazards. Full abatement of lead-based paint is required.

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

The general emphasis on housing is intended to have the long-term effect of alleviating poverty. By providing individuals with a decent, stable and well located home, individuals will be given essential tools they need to success. As noted in the plan, several initiatives are also planned to include job training programs. Each of these efforts is intended to improve the employment outlook for individuals.

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

Lake County Community Development continues to work with partner agencies to improve the connections between service providers which will serve to strengthen the existing system. The eviction prevention partnership between the Community Development and the Lake County Courts is a good example of the efforts being undertaken in the County to improve collaboration and systems improvement. Finally, Community Development continues to look for grant opportunities that will support systems changes that will increase collaboration and improve outcomes for Lake County residents.

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

Lake County continues to actively participate in Continuum of Care, Alliance for Human Services and Live Well Lake County efforts to bridge the available resources for Lake County residents.

### **Discussion**

Lake County plays a role in facilitating many local partnership. A pilot program was initiated by Wauconda School District 118, Catholic Charities and the Continuum of Care to provide services and rental subsidies to families in the district whoa reexperiencing homelessness or housing instability. The first two families in that pilot program obtained housing and remained in their home school area. Lake County is working to

expand this program outside of District 118.

## **Program Specific Requirements**

### **AP-90 Program Specific Requirements - 91.420, 91.220(I)(1,2,4)**

#### **Introduction**

#### **Community Development Block Grant Program (CDBG)**

##### **Reference 24 CFR 91.220(I)(1)**

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

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

#### **Other CDBG Requirements**

1. The amount of urgent need activities	0
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#### **HOME Investment Partnership Program (HOME)**

##### **Reference 24 CFR 91.220(I)(2)**

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

In addition to investing HOME Investment Partnership Program (HOME) funds in eligible activities as described in 24 CFR 92.205, Lake County invests other funding sources into housing activities. CDBG funds are often utilized for CDBG-eligible housing activities. Additionally, local Affordable Housing Program (AHP) funds are invested in housing activities to complement those funded by HOME and CDBG.

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

Lake County's Recapture and Resale Provisions document describe the conditions under which a homebuyer activity will be subject to either resale or recapture. Recapture provisions shall be enforced in cases where HOME funds are provided as a direct subsidy to the homebuyer as down payment and/or purchase- price assistance. Resale provisions shall be required when the HOME subsidy is provided in the form of a development subsidy in which HOME funds are divided among each HOME-assisted unit and not provided as a direct subsidy to the homebuyer. Resale provisions shall be encouraged when the HOME subsidy is provided in the form of a direct subsidy to the homebuyer and a Community Land Trust or other similar entity maintains ownership of the land associated with the HOME-assisted property to ensure its continued affordability, or it is determined that the property is located in a highly appreciating market for the purpose of maintaining the unit's affordability throughout the entire period of affordability.

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

Lake County's Recapture and Resale Provisions document ensures the affordability of units acquired with HOME funds. When resale provisions are applicable, the unit is sold to an income-eligible homebuyer and the period of affordability is completed by a second low-income beneficiary. When recapture provisions are applicable, the appropriate portion of funds are recaptured from the homebuyer and reinvested in an additional HOME-eligible activity, and the period of affordability is met by a second low-income beneficiary.

4. Plans for using HOME funds to refinance existing debt secured by multifamily housing that is rehabilitated with HOME funds along with a

description of the refinancing guidelines required that will be used under 24 CFR 92.206(b), are as follows:

Lake County does not currently utilize HOME funds to refinance existing debt secured by multifamily housing that is rehabilitated with HOME funds.

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

No TBRA activities are planned for PY25.

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

No TBRA activities are planned for PY25.

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

No preferences or limitations are planned for rental housing projects.

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

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

Lake County's Written Standards for Provision of Emergency Solutions Grants (ESG) Assistance are attached.

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

that centralized or coordinated assessment system.

The Lake County Coalition for the Homeless, which serves as Lake County's Continuum of Care, has a Coordinated Entry system that meets HUD requirements for a coordinated assessment system. Individuals and families experiencing homelessness engage with the system at Entry Points, where they are assessed for the By-Name List and prioritized for housing resources. All beneficiaries are tracked through the centralized Homeless Management Information System database. The CoC reviews data on the System Performance Metrics to track the success of individual programs as well as the system as a whole and allocates funding to best address system needs.

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

ESG funding is allocated through an annual application round. Community organizations are invited to submit applications for ESG-eligible activities, which are scored by Lake County staff according to a scoring matrix. Funding recommendations are discussed by the Public Services Advisory and Recommendation Committee, then passed on to the Housing and Community Development Commission for approval. These meetings are open to public comment. The Lake County Board ultimately approves the recommendations, and funds are distributed to the awardees.

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

Not applicable; the jurisdiction is able to meet the homeless participation requirement in 24 CFR 576.405(a).

5. Describe performance standards for evaluating ESG.

ESG recipients are expected to abide by all ESG rules and requirements and provide high quality service. In order to ensure compliance, ESG recipients are monitored annually utilizing monitoring tools developed in accordance with HUD monitoring guidance. Monitoring includes a review of program documents, including program policies and participant files. Any deficiencies are addressed with the agency quickly.

## Appendix - Alternate/Local Data Sources

1	<b>Data Source Name</b> 2007-2011 American Community Survey
	<b>List the name of the organization or individual who originated the data set.</b> US Census Bureau
	<b>Provide a brief summary of the data set.</b> Household demographic survey sent to approximately 250,000 American households monthly.
	<b>What was the purpose for developing this data set?</b> Demographic research.
	<b>Provide the year (and optionally month, or month and day) for when the data was collected.</b> 2007-2011
	<b>Briefly describe the methodology for the data collection.</b> Household demographic survey sent to approximately 250,000 American households monthly.
	<b>Describe the total population from which the sample was taken.</b> United States
	<b>Describe the demographics of the respondents or characteristics of the unit of measure, and the number of respondents or units surveyed.</b> Household demographic survey sent to approximately 250,000 American households monthly.
2	<b>Data Source Name</b> LCHA Inventory

	<p><b>List the name of the organization or individual who originated the data set.</b></p> <p>Lake County Housing Authority</p>
	<p><b>Provide a brief summary of the data set.</b></p> <p>Inventory data on public housing units and vouchers managed by housing authority.</p>
	<p><b>What was the purpose for developing this data set?</b></p> <p>Inventory management.</p>
	<p><b>How comprehensive is the coverage of this administrative data? Is data collection concentrated in one geographic area or among a certain population?</b></p> <p>Covers LCHA only.</p>
	<p><b>What time period (provide the year, and optionally month, or month and day) is covered by this data set?</b></p> <p>Ongoing; latest version: 8/2014.</p>
	<p><b>What is the status of the data set (complete, in progress, or planned)?</b></p> <p>Complete.</p>
<b>3</b>	<p><b>Data Source Name</b></p> <p>HMIS Inventory</p>
	<p><b>List the name of the organization or individual who originated the data set.</b></p> <p>Lake County Community Development, HMIS Inventory</p>
	<p><b>Provide a brief summary of the data set.</b></p> <p>Homeless Management Inventory System data - provides data on homeless persons and homeless facilities in a given locality.</p>
	<p><b>What was the purpose for developing this data set?</b></p> <p>Providing insight into homelessness</p>



	<p><b>How comprehensive is the coverage of this administrative data? Is data collection concentrated in one geographic area or among a certain population?</b></p> <p>Lake County</p>
	<p><b>What time period (provide the year, and optionally month, or month and day) is covered by this data set?</b></p> <p>Ongoing; data in plan current as of 8/2014</p>
	<p><b>What is the status of the data set (complete, in progress, or planned)?</b></p> <p>Complete</p>
4	<p><b>Data Source Name</b></p> <p>2000 Census</p>
	<p><b>List the name of the organization or individual who originated the data set.</b></p> <p>United States Census Bureau</p>
	<p><b>Provide a brief summary of the data set.</b></p> <p>The Census collects data on the characteristics of individuals, households, and housing units throughout the country.</p>
	<p><b>What was the purpose for developing this data set?</b></p>
	<p><b>Provide the year (and optionally month, or month and day) for when the data was collected.</b></p> <p>2000</p>
	<p><b>Briefly describe the methodology for the data collection.</b></p>
	<p><b>Describe the total population from which the sample was taken.</b></p>

	<p><b>Describe the demographics of the respondents or characteristics of the unit of measure, and the number of respondents or units surveyed.</b></p>
5	<p><b>Data Source Name</b></p> <p>2009-2013 American Community Survey</p>
	<p><b>List the name of the organization or individual who originated the data set.</b></p> <p>United States Census Bureau</p>
	<p><b>Provide a brief summary of the data set.</b></p> <p>The American Community Survey (ACS) helps local officials, community leaders, and businesses understand the changes taking place in their communities. It is the premier source for detailed population and housing information about our nation.</p>
	<p><b>What was the purpose for developing this data set?</b></p>
	<p><b>Provide the year (and optionally month, or month and day) for when the data was collected.</b></p> <p>2009-2013</p>
	<p><b>Briefly describe the methodology for the data collection.</b></p> <p>The data is collected through a long-form questionnaire and is sent to a small percentage of the population throughout the decade.</p>
	<p><b>Describe the total population from which the sample was taken.</b></p> <p>The population includes all states and the District of Columbia.</p>
	<p><b>Describe the demographics of the respondents or characteristics of the unit of measure, and the number of respondents or units surveyed.</b></p> <p>Between 2009 and 2011, between 1,917,748 and 2,208,513 households were interviewed each year.</p>
6	<p><b>Data Source Name</b></p> <p>2000 Census (Manually Input)</p>

	<b>List the name of the organization or individual who originated the data set.</b> The United States Census Bureau
	<b>Provide a brief summary of the data set.</b> The data set counts the number of people living in the United States.
	<b>What was the purpose for developing this data set?</b> According to the Census Bureau, the purpose is to count every person living in the United States of America, and to use that count to determine representation in the Congress.
	<b>Provide the year (and optionally month, or month and day) for when the data was collected.</b> April 1, 2000
	<b>Briefly describe the methodology for the data collection.</b> To count population, the Census Bureau uses a cohort component method to produce estimates. This is derived from a demographic balancing equation.
	<b>Describe the total population from which the sample was taken.</b> The total population includes all of the 50 states in the United States, the District of Columbia, and the U.S. territory of Puerto Rico.
	<b>Describe the demographics of the respondents or characteristics of the unit of measure, and the number of respondents or units surveyed.</b> The national response rate was 67%. The demographics are as follows: 49.1% Male and 50.9% Female. 75.1% White, 12.3% Black or African American, .9% American Indian and Alaska Native, 3.6% Asian, .1% Native Hawaiian and Other Pacific Islander, 5.5% Some other race, 2.4% Two or more races.
7	<b>Data Source Name</b> EMSI Labor Market Analytics
	<b>List the name of the organization or individual who originated the data set.</b> Lake County Partners

	<p><b>Provide a brief summary of the data set.</b></p> <p>EMSI contains data from government sources like US Census Bureau and the Department of Labor plus data from job advertisements made by employers (aka real-time labor market data).</p>
	<p><b>What was the purpose for developing this data set?</b></p> <p>Third party provider, Emsi, sells this data tool to clients like Lake County Partners.</p>
	<p><b>How comprehensive is the coverage of this administrative data? Is data collection concentrated in one geographic area or among a certain population?</b></p> <p>Comprehensive</p>
	<p><b>What time period (provide the year, and optionally month, or month and day) is covered by this data set?</b></p> <p>2019-20</p>
	<p><b>What is the status of the data set (complete, in progress, or planned)?</b></p> <p>Complete</p>
8	<p><b>Data Source Name</b></p> <p>ATTOM Data</p>
	<p><b>List the name of the organization or individual who originated the data set.</b></p> <p>ATTOM Data Solutions</p>
	<p><b>Provide a brief summary of the data set.</b></p> <p>Assessor, Recorder, Foreclosure, Geocodes, Property Characteristics, Valuations, Ownership, Mortgage Loan, and Sales History data compiled in one data warehouse.</p>
	<p><b>What was the purpose for developing this data set?</b></p> <p>From the ATTOM Website: ATTOM provides premium real estate data to power products that improve transparency, innovation, efficiency and disruption in a data-driven economy.</p>

	<p><b>How comprehensive is the coverage of this administrative data? Is data collection concentrated in one geographic area or among a certain population?</b></p> <p>The ATTOM website indicates the data covers 99% of the U.S. population.</p>
	<p><b>What time period (provide the year, and optionally month, or month and day) is covered by this data set?</b></p> <p>N/A</p>
	<p><b>What is the status of the data set (complete, in progress, or planned)?</b></p> <p>In progress</p>



# Written Standards for Provision of Emergency Solutions Grants (ESG) Assistance

Last Revised May 2020

# Eligibility Evaluation Policy

*Standard policies and procedures for evaluating individuals' and families' eligibility for assistance under ESG.*

Each individual program is allowed to have general criteria by which they evaluate a potential participant's eligibility in an ESG-funded program. All such criteria must be reviewed and approved by the Homeless Assistance Application Review Committee of the Community Development Commission (CDC), and must contain the following:

- All program participants must have an initial consultation with a case manager or other authorized representative who can determine eligibility and the appropriate type of assistance needed.
- All program participants must have income at or below 30% of the Area Median Income (AMI). Income shall be determined on a prospective basis (not retrospective), and shall be certified using the Part 5 definition.
- A Staff Certification form must be completed with each eligibility evaluation.

For persons who are considered "literally homeless," no additional eligibility criteria are necessary. The documentation requirements for such persons are as follows:

- Written observation by the outreach worker; or
- Written referral by another housing or service provider (including HMIS recorded referral); or
- Certification by the individual or head of household seeking assistance stating that (s)he was living on the streets or in a shelter.
- For individuals exiting an institution – one of the above forms of evidence and:
  - Discharge paperwork or written/oral referral, or
  - Written record of intake worker's due diligence to obtain above evidence and certification by individual that they exited institution

For persons who are considered at "imminent risk of homelessness," the following documentation is required:

- A court order resulting from an eviction action notifying the individual or family that they must leave; or
- For individual and families leaving a hotel or motel – evidence that they lack the financial resources to stay; or
- A documented and verified oral statement; and
  - Certification that no subsequent residence has been identified; and
  - Self-certification or other written documentation that the individual lacks the financial resources or support necessary to obtain permanent housing.

Finally, persons that are fleeing or attempting to flee domestic violence must have the following documentation:

- *For victim service providers:*
  - An oral statement by the individual or head of household seeking assistance which states: they are fleeing; they have no subsequent residence; and they lack resources to obtain safe and adequate housing on their own. Statement must be documented by a self-certification or a certification by an intake worker.

- *For non-victim service providers (i.e., agencies who do not exclusively serve DV victims):*
  - Oral statement by the individual or head of household seeking assistance that they are fleeing. This statement is documented by a self-certification or by the caseworker. Where the safety of the individual or family is not jeopardized, the oral statement must be verified; and
  - Certification by the individual or head of household that no subsequent residence has been identified; and
  - Self-certification or other written documentation, that the individual or family lacks the financial resources and support networks to obtain other permanent housing.

Lake County does not intend to serve many persons considered homeless under other Federal statutes at this time; however, the following documentation is required:

- Certification by the organization that the individual or head of household seeking assistance met the criteria for homelessness under another federal statute; and
- Certification that the individual or head of household had no permanent housing in the last 60 days; and
- Certification by the individual or head of household, and any available supporting documentation, that (s)he has moved two or more times in the past 60 days; and
- Documentation of special needs or at least two of the following barriers:
  - the lack of a high school degree or General Education Development (GED);
  - illiteracy;
  - low English proficiency;
  - a history of incarceration or detention for criminal activity;
  - a history of unstable employment

### ***“At Risk of Homelessness”***

For persons who are considered “at risk of homelessness,” the following criteria apply:

- Program participants must not have sufficient resources or support networks, e.g., family, friends, faith-based or other social networks, immediately available to prevent them from moving to an emergency shelter or another place described in the definition of homeless; and
  - Meets ONE of the following conditions:
    - Has moved because of economic reasons two or more times during the 60 days immediately preceding the application for homelessness prevention assistance;
    - Is living in the home of another because of economic hardship;
    - Has been notified in writing that their right to occupy their current housing or living situation will be terminated within 21 days after the date of application for assistance;
    - Lives in a hotel or motel and the cost of the hotel or motel stay is not paid by charitable organizations or by federal, State, or local government programs for low-income individuals;
    - Lives in a single-room occupancy or efficiency apartment unit in which there reside more than two persons or lives in a larger housing unit in which there reside more than 1.5 people per room, as defined by the U.S. Census Bureau;
    - Is exiting a publicly funded institution, or system of care (such as a health-care facility, a mental health facility, foster care or other youth facility, or correction program or institution); or



- Otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness, as identified in the Lake County Consolidated Plan;

For persons who are considered “at risk of homelessness,” the following documentation is required:

- A documented and verified oral statement from the program participant; and
- Certification that no subsequent residence has been identified; and
- Self-certification or other written documentation that the individual lacks the financial resources or support necessary to obtain permanent housing; and
- Written documentation that the individual meets one of the conditions listed

# Homeless Services Coordination Policy

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*Policies and procedures for coordination among emergency shelter providers, essential service providers, homelessness prevention and rapid re-housing assistance providers, other homeless assistance providers, and mainstream service and housing providers.*

All ESG-funded programs must participate in the Lake County Homeless Management Information System (HMIS), commonly known as ServicePoint. Only programs that are specifically forbidden by other statutes or regulations (e.g., domestic violence victim service providers) may not participate. All HMIS-participating agencies must collect and maintain common data fields as determined by the HMIS Administrator and HMIS Committee, considering all relevant regulations. These common practices will be to ensure services are coordinated among organizations – one client, one record.

Lake County worked in concert with the Lake County Coalition for the Homeless, which serves as the Continuum of Care for IL-502 Waukegan/North Chicago/Lake County, to develop a robust system for Coordinated Entry that is tailored to the local need. Please reference the Lake County Coalition for the Homeless Coordinated Entry Policies and Procedures for more detail.

Finally, all ESG-funded programs must send a representative to the meetings of the Lake County Coalition for the Homeless. Participation in at least one committee is also required. Failure to attend may result in penalties on future applications.

# Prioritization Policies

*Policies and procedures for determining and prioritizing which eligible families and individuals will receive homelessness prevention assistance and which eligible families and individuals will receive rapid re-housing assistance.*

## Homelessness Prevention

Any household that may otherwise be eligible for prevention assistance under ESG must also meet the “but for” rule – that is, “Would this individual or family be homeless but for this assistance?”

The “but for” rule can be documented with the following:

- Certification by the individual or head of household that no subsequent residence has been identified; and
- Self-certification or other written documentation, that the individual or family lacks the financial resources and support networks to obtain other permanent housing.

Furthermore, any household that qualifies for prevention assistance and meets the “but for” rule must also have the following qualifications:

- Have no more than three months of arrears; and
- Demonstrate an ability to sustain housing; and
- Demonstrate an ability to earn income; and
- Would remain in housing that is decent, safe, sanitary, and affordable.

If the household cannot meet the above qualifications, it is reasonable to infer that the household is in greater need than prevention assistance can provide for, and the household will be referred to a more appropriate program.

## Rapid Re-Housing

Programs funded to do rapid rehousing in Lake County must use an assessment that identifies barriers to obtaining and maintaining housing. Programs will select participants based on this assessment by prioritizing the population where a rapid rehousing intervention will be most effective. This population will have barriers to housing but not significant barriers. Programs will continue to assess the match between intervention and target population as data is available.

# Rent & Utility Cost Sharing Policy

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*Standards for determining the share of rent and utilities costs that each program participant must pay, if any, while receiving homelessness prevention or rapid re-housing assistance.*

Each individual program is allowed to have general criteria by which they determine a program participant's share of rent and/or utilities in an ESG-funded program. All such criteria must be reviewed and approved by the Homeless Assistance Application Review Committee of the Community Development Commission (CDC).

Rapid rehousing programs will focus subsidies on providing just enough assistance to allow participants to maintain housing. Programs will use a declining subsidy model to allow participants to adjust to subsidy reductions over time. Participants will be better prepared to assume full responsibility for rent as program termination approaches.

# Length of Participation Policy – Financial Assistance

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*Standards for determining how long a particular program participant will be provided with rental assistance and whether and how the amount of that assistance will be adjusted over time.*

Within homeless prevention programs, ESG funds will be limited to short-term rental assistance (up to three months) and payment of rental arrears (up to three months). Participants may only receive ESG prevention assistance once in a 24-month period.

Rapid rehousing programs will provide rental assistance for a maximum of thirteen months. In addition, payment of a full security deposit and up to three months of rental arrears will be allowed.

In cases where a rapid rehousing household experiences an adverse event and the household's case manager determines additional assistance is warranted, the limits on rental assistance are waived and support may be extended on a month by month basis. Extensions may be provided, so long as there is a demonstrated need, up to the regulatory maximum of 24 months. Any rental arrears provided count towards the 24-month maximum.

# Length of Participation Policy – Housing Stabilization and/or Relocation Services

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*Standards for determining the type, amount, and duration of housing stabilization and/or relocation services to provide a program participant, including the limits, if any, on the homelessness prevention or rapid re-housing assistance that each program participant may receive, such as the maximum amount of assistance, maximum number of months the program participants receive assistance; or the maximum number of times the program participants may receive assistance.*

The amount and type of Housing Stabilization and/or Relocation Services to be provided to a particular program participant will be determined by the organization providing the assistance within the following parameters:

- Program staff will meet with participants at least once monthly for the duration of their program participation.
- Programs will conduct follow-up with participants, three and six months after they are exited from the program.
- In homeless prevention programs, the duration of such services shall not exceed six months.
- In rapid rehousing programs, services will not exceed sixteen months.
- In cases where a rapid rehousing household experiences an adverse event and the household's case manager determines additional assistance is warranted, the limits on services are waived and support may be extended on a month by month basis. Extensions may be provided, so long as there is a demonstrated need, up to the regulatory maximum of 24 months.
- In cases where a household, during the course of program participation, is determined to be a candidate for permanent supportive housing, the length of rental subsidy limits, declining subsidy model, and limits on services are waived and support may be provided up to the regulatory maximum of 24 months while a permanent supportive housing unit is pursued. The housing placement workgroup of the Lake County Coalition for the Homeless (serving as the Continuum of Care) must provide approval for any household to be granted this waiver.

# Performance Measures

*Performance measures for ESG projects were developed in consultation with the Continuum of Care to align with the strategies to end homelessness in Lake County, the existing reporting requirements of the CoC and the data available in the homeless management information system.*

Lake County developed the following performance measures, in consultation with the Continuum of Care, to help accomplish the following goals:

- Measure program performance
- Align program evaluation between ESG and the CoC
- Measure the County's progress toward homeless services goals as outlined in the Consolidated Plan, Annual Action plan and reported to HUD in the Consolidated Annual Performance and Evaluation Report (CAPER)

Participation in the Homeless Management Information System (HMIS) is required by ESG regulation for all projects receiving ESG funding. Therefore, all performance measures must be tracked in and run out of HMIS, locally known as ServicePoint.

The required ESG performance measures are as follows:

For all programs:

- Average length of stay
- Percentage of households with exits to permanent destinations
- Percentage of adult participants who maintain or increase their income

For Homeless Prevention Programs (except legal services) and Rapid Rehousing Programs:

- Percentage of households who remain in permanent housing six months after their exit from the program

# Lake County HOME Consortium: Recapture and Resale Provisions

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## *Resale and Recapture Policies*

These guidelines apply when a homebuyer or developer is assisted with HOME Investment Partnerships Program funds and the homebuyer sells or transfers the assisted property after the initial HOME-assisted purchase.

## *Period of Affordability*

Consistent with 24 CFR Part 92.254(a)(4), the following minimum period of affordability shall be enforced:

<u>HOME amount per unit</u>	<u>Minimum Period of Affordability</u>
Under \$15,000	5 years
\$15,000 to \$40,000	10 years
Over \$40,000	15 years

The Lake County Consortium may use HOME Program funds to provide homeownership assistance. The forms of subsidy to be used to assist homebuyers and/or developers include down payment assistance, interest subsidy, development cost subsidy, direct loan, project grant, or some combination of these methods. Lake County shall determine, based upon the type of subsidy, form of ownership, and type of market in which the property is located, whether the period of affordability shall be enforced by either Resale or Recapture provisions.

## *Resale Provisions*

- Activity Types - Resale provisions as outlined in 24 CFR Part 92.254(a)(5)(i)(A) and (B) shall be required or encouraged in the following cases:
  - Resale provisions shall be required when the HOME subsidy is provided in the form of a development subsidy in which HOME funds are divided among each HOME-assisted unit and not provided as a direct subsidy to the homebuyer.
  - Resale provisions shall be encouraged when the HOME subsidy is provided in the form of a direct subsidy to the homebuyer and a Community Land Trust or other similar entity maintains ownership of the land associated with the HOME-assisted property to ensure its continued affordability in perpetuity.
  - Resale provisions shall be encouraged when the HOME subsidy is provided in the form of a direct subsidy to the homebuyer and it is determined that the property is located in a highly appreciating market for the purpose of maintaining the unit's affordability throughout the entire period of affordability.
- Methods – The resale option ensures that the HOME-assisted unit remains affordable over the entire period of affordability. All HOME-assisted units shall meet the following criteria:
  - The new purchaser must be low-income, meeting the HOME Program definition, and within the same income limit as the original buyer. Additionally, the new purchaser must occupy the property as their principle residence.
  - To ensure that the sales price is affordable to a low-income homebuyer, the homebuyer may receive HOME Program direct assistance through a reduction in sales price, down payment assistance, or closing cost assistance. The additional HOME Program assistance may result in a longer Period of Affordability for the unit.
  - The sales price must be “affordable” to the new purchaser. In this instance, affordability for the new purchaser is a sales price that would require the new purchaser to pay no more 30% of their monthly



income on the fixed costs of homeownership (the loan principal, interest, taxes and insurance, or “PITI payment”).

- The maximum sale price shall be calculated using the following formula:

$$\begin{array}{r} \text{Down Payment} \\ \text{Loan Principal Paid} \\ \text{Current Loan Amount} \\ \text{Capital Improvement Value} \\ + \text{House Value Change, per HPI} \\ \hline \text{Maximum Sales Price} \end{array}$$

Down Payment: the financial contribution by the original homebuyer for their acquisition of the property, as evidenced on the HUD-1 or closing statement.

Loan Principal Paid: Payments made by the original homebuyer on their purchase money loan. This shall be calculated by the difference between the original loan amount at time of purchase (from the HUD-1 or closing statement or recorded loan document) and the loan amount at time of sale (from the loan payoff letter or other documentation from the lender).

Current Loan Amount: The amount of the purchase money loan at the time of sale (from the loan payoff letter or other documentation from the lender).

Capital Improvement: an investment by the original homebuyer into the house’s infrastructure such as the roof, heating system, or windows. Lake County shall use the actual cost of the Capital Improvement, not the increase in value to the house because of the Capital Improvement. For the cost of the Capital Improvement to be eligible the original homebuyer must show proof of payment. Capital Improvement shall not include routine maintenance to the house, such as painting.

House Value Change: The dollar value in the increase or decrease of the house as produced from the “Housing Price Index Calculator” at [www.FHFA.gov](http://www.FHFA.gov).

The house may be sold for less than the maximum sales price, so long as the sales price still meets the other requirements of this Resale Policy.

- The sales price must provide the original homebuyer, now the seller, a “fair return” on their investment (including any down payment, loan principal payments and capital improvement investment made by the owner since purchase). Fair return to seller shall be calculated using the following formula:

$$\begin{array}{r} \text{Down Payment} \\ \text{Capital Improvement Value} \\ \text{Loan Principal Paid} \\ + \text{House Value Change, per HPI} \\ \hline \text{Fair Return to Seller} \end{array}$$

Down Payment: as defined above.

Capital Improvement: as defined above.

Loan Principal Paid: as defined above.

House Value Change: as defined above.

NOTE: In a declining housing market the original homebuyer may not receive a return on their investment because the house will sell for less than or the same price as the original homebuyer's purchase price. Due to the declining market, this would be considered a fair return because the house values are depreciating rather than appreciating.

- Houses that are part of a community land trust shall follow a modified version of the maximum resale price formula:

$$\begin{array}{r} \text{Original Purchase Price} \\ \text{Homeowner share of appreciation} \\ + \text{Capital Improvement Value} \\ \hline \text{Fair Return to Seller} \end{array}$$

Original Purchase Price: The dollar value paid for the house as evidenced by the sales contract, HUD-1 or settlement statement.

Homeowner share of appreciation: The market appreciation of the house multiplied by the homeowner's investment ratio multiplied by 15%. The market appreciation shall be the difference in the value of the house as determined by an appraisal at the time of the homeowner's original purchase and at the time of sale; in a declining housing market, the market appreciation value may be negative. The homeowner's investment ratio shall be the ratio of the Original Purchase Price to the appraised value of the house at the time of original purchase.

Capital Improvement Value: as defined above.

The house may be sold for less than the maximum sales price, so long as the sales price still meets the other requirements of this Resale Policy.

Individual projects may apply for changes in the above formula for application to that specific project with the approval of Community Development Staff. The formula for "fair return" must be included in the contract between Lake County and the project partner.

- Enforcement Mechanisms - Resale requirements shall be enforced through deed restriction, covenant, land use restriction agreement, or other similar mechanism filed with the Lake County Recorder of Deeds and the requirements within shall be triggered upon sale or transfer of the HOME-assisted property.

### *Recapture Provisions*

- A. Activity Types - Recapture provisions as outlined in 24 CFR Part 92.254(a)(5)(ii)(A)(1) through (7) shall be enforced in cases where HOME funds are provided as a direct subsidy to the homebuyer as down payment and/or purchase-price assistance.
- B. Methods – The recapture option allows Lake County to recapture the entire HOME subsidy, subject to net proceeds if any, if the HOME recipient decides to sell the unit within the period of affordability at whatever price the market will bear. All HOME-assisted unit sales under the recapture option shall meet the following criteria:
  - The homebuyer may sell the property to any willing buyer.

- The sale of the property during the period of affordability triggers repayment of the direct HOME subsidy, subject to net proceeds if any, to Lake County that the buyer received when he/she originally purchased the home.
- C. Enforcement Mechanisms - Recapture provisions shall be enforced through a mortgage, note and Recapture Agreement filed with the Lake County Recorder of Deeds, and the requirements within shall be triggered upon sale or transfer of the HOME-assisted property.
- D. Amount of Repayment – Lake County requires that when the recapture requirement is triggered by a sale (whether voluntary or involuntary), it will recapture the HOME investment up to the total net proceeds remaining, if any, after the sale as modified by program specific choices under 24 CFR Part 92.254(a)(5)(ii)(A)(1) through (4). Net proceeds are the sales price minus the superior loan repayment (other than HOME funds) and any closing costs. In cases where the superior loan repayment and closing costs meet or exceed the sales price, net proceeds are zero. The specific method of recapture as capped by net proceeds, if any, is the following:
- a. Reduction during the affordability period - Reduce the HOME investment amount to be recaptured on a pro rata basis for the time the homeowner has owned and occupied the housing measured against the required affordability period.

Period of Affordability - Years	Period of Affordability - Months	Pro rata Monthly Reduction
5	60	1/60
10	120	1/120
15	180	1/180

- E. Mortgage Release - Upon receipt of recaptured funds, Lake County shall file a “Release” document with the Lake County Recorder of Deeds to release the original HOME-assisted homebuyer from the requirements of the mortgage or other similar mechanism.
- F. Repayments – Repayments of recaptured funds shall be remitted directly to Lake County to be utilized for HOME-eligible activities only.

### *Compliance*

- A. If the homebuyer is in noncompliance with the HOME Program requirements, the homebuyer shall repay the entire direct HOME Program subsidy to the Lake County Consortium within 90 days of notification of noncompliance. In the event of repayment due to noncompliance, the repayment amount is not subject to pro rata reduction over the period of affordability.
- B. Noncompliance with the HOME Program requirements includes: (1) failure to occupy the unit as the homebuyer’s principal place of residence, either by vacating or leasing the unit, throughout the entire Period of Affordability; (2) purposefully providing false information as to the homebuyer’s income or status as low-income; (3) failure to maintain the unit in accordance with all State and local housing quality standards or codes; (4) failure to comply with Lake County Consortium monitoring to determine compliance with the principal residency or property standards requirements; or (5) the sale or transfer of the unit without adherence to the resale/recapture provisions established in the mortgage, note, and homebuyer agreement.

# **Lake County HOME Homeownership Value Limits (95% Rule) Determination**

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## **Background**

According to 24 CFR 92.254, the participating jurisdiction may determine 95 percent of the median area purchase price for single family housing in the jurisdiction annually in lieu of the limits provided by HUD. The following information must be included in the annual action plan of the Consolidated Plan submitted to HUD for review and updated in each action plan.

## **Determined Limit**

The HOME Homeownership Value Limit for 2025 is \$433,200.00

## **Income Determination and Market Study Methodology**

The market analysis has been completed in accordance with the rules in 24 CFR 92.254(a)(2)(iii)(A)-€ to ensure that a sufficient number of recent housing sales are included in the survey.

- As there were over 500 sales, the market study covers a month reporting period, listed in ascending order of sales price.
- The street address of each property is included in the data.
- The attached market analysis includes all housing sales reported in the MLS database in Lake County for April 2025, ensuring that the sales data reflects all or nearly all of the one-family house sales in the entire participating jurisdiction.
- The total number of sales is odd, so the median sales price has been determined by taking the middle sale on the list and multiplying that sale price by 0.95.