CITY OF NAPERVILLE Steve Chirico, Mayor

COMMUNITY SERVICES DEPARTMENT

2021 CONSOLIDATED
ANNUAL
PERFORMANCE
AND
EVALUATION REPORT
(CAPER)



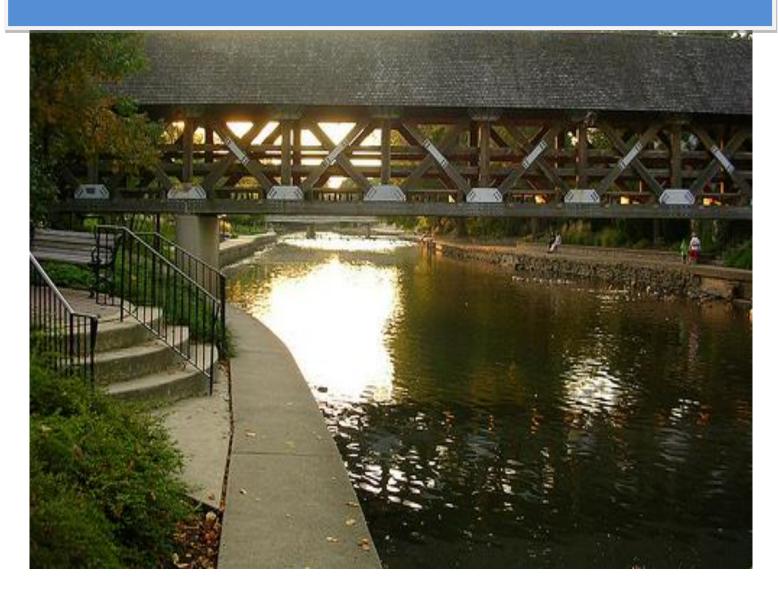


Table of Contents

CR-05 - Goals and Outcomes	2
CR-10 - Racial and Ethnic composition of families assisted	
CR-15 - Resources and Investments 91.520(a)	
CR-20 - Affordable Housing 91.520(b)	13
CR-25 - Homeless and Other Special Needs 91.220(d, e); 91.320(d, e); 91.520(c)	16
CR-30 - Public Housing 91.220(h); 91.320(j)	18
CR-35 - Other Actions 91.220(j)-(k); 91.320(i)-(j)	19
CR-40 - Monitoring 91.220 and 91.230	23
CR-45 - CDBG 91.520(c)	26
CR-58 – Section 3	27

CR-05 - Goals and Outcomes

Progress the jurisdiction has made in carrying out its strategic plan and its action plan. 91.520(a)

This could be an overview that includes major initiatives and highlights that were proposed and executed throughout the program year.

Entitlement Funds: For PY 2021, the City of Naperville received \$557,688 in CDBG entitlement grant funds. These funds were allocated to 10 projects, including Grant Administration. Major initiatives included the following:

- 1) Affordable Rental Housing Rehabilitation \$125,000 to acquire and rehabilitate a two-bedroom condominium apartment as permanent affordable rental housing in an apartment building providing affordable housing to low and moderate-income homeowners and renters with impaired mobility.
- 2) Affordable Owner-Occupied Housing Rehabilitation \$42,851 in PY 2021 funds was added to \$41,750 in PY 2019 funds to create a single-family home repair program for low and moderate-income homeowners.
- 3) Special Needs Housing and Supportive Services \$123,800 to rehabilitate three CILA (Community Integrated Living Arrangements) homes for three organizations providing housing and services to adults with severe physical and mental disabilities.
- **4) Homeless Housing and Supportive Services** \$110,000 for energy efficiency rehabilitation projects at an 8-unit apartment building providing transitional housing and social services to formerly homeless households.
- 5) Non-Housing Community Development Needs: Homelessness \$68,534 to a public service to prevent homelessness by providing emergency rent and utility assistance to persons at risk of homelessness
- 6) Non-Housing Community Development Needs: Public Services \$15,118 to provide on-site services to chronically homeless persons living in supportive housing.
- **7) Administration/Planning** \$60,000 was allocated to Administration/Planning expenses, with an additional \$12,385 allocated to hiring a consultant conduct a paired real estate testing study.

Comparison of the proposed versus actual outcomes for each outcome measure submitted with the consolidated plan and explain, if applicable, why progress was not made toward meeting goals and objectives. 91.520(g)

Categories, priority levels, funding sources and amounts, outcomes/objectives, goal outcome indicators, units of measure, targets, actual outcomes/outputs, and percentage completed for each of the grantee's program year goals.

Goal	Category	Source / Amount	Indicator	Unit of Measure	Expected - Strategic Plan	Actual – Strategic Plan	Percent Complete	Expected - Program Year	Actual – Program Year	Percent Complete
Administration & Planning	Planning & Administration	CDBG:	Other	Other	N/A	N/A	N/A	N/A	N/A	N/A
Affordable Owner-Occupied Housing	Affordable Housing	CDBG:	Homeowner Housing Rehabilitated	Household Housing Unit	34	0	0.00%	9	0	0.00%
Affordable Rental Housing	Affordable Housing	CDBG:	Rental units rehabilitated	Household Housing Unit	302	0	0.00%	212	0	0.00%
Homeless Housing and Supportive Services	Homeless	CDBG:	Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit	Households Assisted	146	0	0.00%	136	0	0.00%
Non-Housing Community Development: Accessibility	Non-Housing Community Development	CDBG:	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	3000	1000	0.00%	0.00%	0	0.00%

Non-Housing Community Development: Homeless	Non-Housing Community Development	CDBG:	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	1500	0	0.00%	0.00%	0	0.00%
Non-Housing Community Development: Homeless	Non-Housing Community Development	CDBG:	Public service activities for Low/Moderate Income Housing Benefit	Households Assisted	0	0		75	0	0.00%
Non-Housing Community Development: Infrastructure	Non-Housing Community Development	CDBG:	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	80	0	0.00%	16	0	0.00%
Non-Housing Community Development: Pub. Facilities	Non-Housing Community Development	CDBG:	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	1000	1000	0.00%	2000	1000	0.00%
Non-Housing Community Development: Pub. Services	Non-Housing Community Development	CDBG:	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	91	0	0.00%	11	0	0.00%

Non-Housing Community Development: Pub. Services	Non-Housing Community Development	CDBG:	Businesses assisted	Businesses Assisted	20	19	95%	5	19	380.00%
Special Needs Housing and Supportive Services	Non-Homeless Special Needs	CDBG:	Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit	Households Assisted	28	1	3.5%	8	1	12.5%

Table 1 - Accomplishments - Program Year & Strategic Plan to Date

Assess how the jurisdiction's use of funds, particularly CDBG, addresses the priorities and specific objectives identified in the plan, giving special attention to the highest priority activities identified.

Entitlement Funds: Naperville's CDBG projects have emphasized preservation and rehabilitation of existing affordable units, both owner and renter occupied. The City has focused the most resources on rental housing, through both and rehabilitation and acquisition, where feasible, since the majority of low and moderate-income residents are renters. The City has also provided significant support to homelessness prevention, transitional housing rehabilitation and public services for people in both emergency housing and supportive as these residents are most likely to be living in poverty or in danger of poverty.

The City has also given high priority to assisting residents with special needs, both by supporting special needs housing rehabilitation and acquisition, services for people with special needs and eliminating architectural barriers in public facilities.

PY 2021 Goals Versus Outcomes

Program Year 2021 was the second year of the 2020-2024 Consolidated Plan. Projects funded by the City of Naperville for PY 2021 focused on five of the eight goals outlined in the City's Strategic Plan: affordable rental housing, homeless housing and supportive services, special needs housing and supportive services, homelessness prevention and non-housing community development, including public facilities. Completion of

projects was impacted by late receipt of funds (PY 2021 funds were not received until August, 2021) and the need to avoid COVID exposure.

CR-10 - Racial and Ethnic composition of families assisted

Describe the families assisted (including the racial and ethnic status of families assisted). 91.520(a)

	CDBG
White	10,499
Black or African American	2,634
Asian	1,600
American Indian or American Native	0
Native Hawaiian or Other Pacific Islander	0
Multi	1,446
Total	14,579
Hispanic	4,716
Not Hispanic	9,863

Table 2 – Table of assistance to racial and ethnic populations by source of funds

Whites accounted for approximately 72% of families assisted; Blacks for approximately 18%, Asians for approximately 11%; and Multi-Racial persons for approximately 10%. Hispanics of all races accounted for approximately 32% of all families assisted.

CR-15 - Resources and Investments 91.520(a)

Identify the resources made available

Source of Funds	Source	Resources Made Available	Amount Expended During Program Year		
CDBG	public - federal	557,688			

Table 3 - Resources Made Available

Narrative

Resources

In PY 2021, Naperville initially received a CDBG Entitlement Grant of \$549,589 to fund PY 2021 projects. The initial amount was revised to \$557,688, an increase of \$8,099. All PY 2021 funds were received by the City in August, 2021.

No new allocations of CARES Act funds or program income were received in PY 2021. Due to project delays caused by the COVID-19 pandemic, prior year funds also were not included.

Investments

Approximately \$1,120,833 in CDBG funds was spent on CDBG projects in PY 2021. This represented a 57% increase in expenditures over PY 2020, when approximately \$713,772 was spent. In comparison, funds spent in PY 2020 represented only a 12% increase over funds expended in PY 2019. The significant increase in expenditures in PY 2021 was primarily due to the continuing expenditure of two rounds of COVID relief funds, totaling \$1,024,728. Of this amount, approximately \$638,721 was spent in PY 2021, as the pandemic stretched on through the year. Expenditures for COVID projects totaled 57% of all funds spent during the program year. Expenditures to complete non-COVID, pre-2021 projects totaled approximately 25% of all funds spent in PY 2021 and PY 2021 projects accounted for approximately 19% of expenditures. Although the program year began April 1, 2021, the City did not receive its PY 2021 Funding Agreement until August 4, 2021. Therefore, all PY 2021 funds spent during the program year were spent between that date and the end of the program year on March 31, 2022.

A breakdown of the PY 2021 expenditures by program year and or program type is shown below:

Program Year	Total Funds Spent in PY 2021	Percentage (%)
PY 2019/PY2020	\$ 270,447	24%
PY 2021	\$ 211,031	19%
COVID Funds (received in PY 2020)	\$ 638,721	57%
TOTALS	\$1,120,833	100%

PY 2021 Project Expenditures – COVID Funds:

- **CV 1901-1 Food and Emergency Assistance Program:** \$36,730.13 to Loaves & Fishes Community Services to provide food and other emergency assistance to low and moderate-income people impacted by the COVID-19 pandemic.
- **CV 1901-2 Emergency Temporary Housing Program:** \$200,000 to DuPage PADS to provide housing in hotels/motels to persons who lost their housing due to COVID-related issues.
- CV 1901-3 Emergency Assistance Program: \$103,621.06 to Loaves & Fishes Community Service to provide temporary rent/mortgage/utility assistance to persons at risk of homelessness due to COVID-related job loss.
- CV 1901-4 CILA Residents Mental Health and Wellbeing Program: \$130,000 to Little Friends,
 Inc. to hire additional staff and provide supplemental programming for disabled residents of group homes experiencing mental health symptoms and employment disruption due to COVID.
- CV 1901-5 Career/Employment Solutions for Individuals and Families Experiencing Homelessness: \$64,355.00 to DuPage PADS to assist people experiencing unemployment and underemployment due to COVID-related job loss.
- **CV 1901-6 Client IT Infrastucture Improvements:** \$30,626.00 to Bridge Communities, Inc. to improve internet service for homeless families living in transitional housing, allowing them to work, job search, and attend school during the COVID-19 pandemic.
- CV 1901-7 Mental Health Access Program: \$43,738.74 to provide mental health counseling and therapy to seniors and low and moderate-income people experiencing new and increased mental health symptoms related to COVID.
- Small Business Assistance Grant: A total of \$95,000 to assist 19 small businesses experiencing COVID-related economic disruption by providing \$5,000 grants to replace lost income and prevent layoffs.

PY 2021 Project Expenditures – Entitlement Funds:

- CD 2102 Olympus Place Supportive Housing Program: \$10,929.98 to DuPage PADS for the Olympus Place Supportive Housing Program, providing services to formerly homeless people now living in supportive housing. Program underway.
- CD 2103 Illinois Independent Living Center Apartment Acquisition and Rehabilitation: \$124,999.18 to Illinois Independent Living Center (IILC) to acquire and rehab a two-bedroom unit at Katherine Manor Apartments, a 31-unit apartment building located 1141 Iroquois, Naperville, IL. Katherine Manor was founded by IILC to provide fully accessible affordable housing for persons with severe physical disabilities, including mobility-impaired persons using wheelchairs. Katharine Manor contains both rental and condominium units. Rental units are owned by IILC, which rents them to low- and moderate-income physically disabled persons at affordable rents. Since there is greater demand for the rental units, IILC has acquired owner-occupied units when they become available for sale. Program completed.

- CD 2105 Loaves & Fishes Emergency Assistance Program: \$45,101.68 to Loaves & Fishes
 Emergency Assistance Program to prevent homelessness by providing rent, mortgage and utility assistance to at-risk households.
- **CD 2109 Program Administration:** \$30,000.00 for program administration expenses for the CDBG Program.

Non-PY 2021 Project Expenditures – Entitlement Funds: Many PY 2021 entitlement-funded projects were delayed due to the pandemic, as were several PY 2019 and 2020 projects that had been expected to conclude in PY 2021 or earlier. Several of these delayed projects were concluded in PY 2021. A total of \$171,427.94 was spent on PY 2020 projects and \$98,909.00 was spent on three (3) PY 2019 projects, for a total of \$201,586.94:

- **CD 1902 Kids Above All:** \$13,936 to upgrade the bathroom and kitchen at a group residence for homeless teens.
- **CD 1906 Little Friends:** \$16,223 to repair the decks and drainage system at a group residence for disabled adults.
- **CD 1909 Turning Pointe Autism Foundation:** \$68,750 to replace the A/C condenser at a school for people with autism.
- CD 2003 DuPage PADS: \$10,929.98 to the Olympus Place Supportive Housing Program, to
 provide services to formerly homeless people now living in supportive housing. Program
 underway.
- **CD 2004 Illinois Independent Living Center (IILC):** \$99,529.33 to upgrade and modernize the security system at an apartment complex for severely physically disabled people.
- CD 2005 Loaves & Fishes Emergency Assistance Program: \$13,285.20 to prevent homelessness by providing emergency rent and utility assistance to at-risk households.
- **CD 2006 CDBG Program Administration:** \$4,113.34 for management and administration of the CDBG Program.
- CD 2008 Northern Illinois Food Bank: \$50,000 to upgrade the food bank's on-site food distribution system.

Identify the geographic distribution and location of investments

Target Area Planned Percentage of Allocation		Actual Percentage of Allocation	Narrative Description	
			Incorporated City of	
City of Naperville	100	96	Naperville, IL	

Table 4 – Identify the geographic distribution and location of investments

Narrative

All PY 2021 projects are located within the incorporated boundaries of the City of Naperville; one PY 2020 project completed in PY 2021 was located outside the city. This project provided rehabilitation

funding to the Northern Illinois Food Bank in Geneva, IL, a food collection and distribution center that provides food to food banks in Naperville for Naperville residents. The reimbursement for this project was equal to approximately 4% of funds spent in PY 2021.

The city did not target specific neighborhoods or residents of specific neighborhoods for investments or services.

Leveraging

Explain how federal funds leveraged additional resources (private, state and local funds), including a description of how matching requirements were satisfied, as well as how any publicly owned land or property located within the jurisdiction that were used to address the needs identified in the plan.

- *Matching Requirements:* None of the projects completed during the program year were subject to matching requirements.
- Publicly Owned Land or Property: No PY 2021 projects or any projects completed in PY 2021 involved publicly owned land or property.
- Leveraging Additional Resources: PY 2021 funded projects from all years leveraged \$1,120,833 in CDBG funds with funding from a variety of funding sources provided by subrecipients to successfully conduct their projects. These funding sources included unrestricted agency funds, bank loans, donations, grants and fundraisers. All project management activities needed to complete the projects, including procurement, supervision, accounting, income verification and preparing reports, were carried out by staff of the subrecipient agencies.

CR-20 - Affordable Housing 91.520(b)

Evaluation of the jurisdiction's progress in providing affordable housing, including the number and types of families served, the number of extremely low-income, low-income, moderate-income, and middle-income persons served.

	One-Year Goal	Actual
Number of Homeless households to be		
provided affordable housing units	8	0
Number of Non-Homeless households to be		
provided affordable housing units	5	0
Number of Special-Needs households to be		
provided affordable housing units	15	1
Total	28	1

Table 5 - Number of Households

	One-Year Goal	Actual
Number of households supported through		
Rental Assistance	300	162
Number of households supported through		
The Production of New Units	0	0
Number of households supported through		
Rehab of Existing Units	31	0
Number of households supported through		
Acquisition of Existing Units	1	1
Total	332	163

Table 6 – Number of Households Supported

Discuss the difference between goals and outcomes and problems encountered in meeting these goals.

Entitlement Funds: The affordable housing goals shown above represent goals included in the PY 2021 Annual Action Plan and affordable housing activities that were completed during PY 2021 (April 1, 2021 – March 31, 2022). The PY 2021 Annual Action Plan included funding for five (5) affordable housing activities to be funded with entitlement funds. These activities are summarized below:

• Households Supported Through Rental Assistance: \$68,534 in PY 2021 funds were allocated to a public service to prevent homelessness by providing emergency rent and utility assistance to persons at risk of homelessness, with a goal of assisting approximately 300 households. Due to the relatively late start of the program, only 162 persons have been assisted to date, but \$8,426.40 in funding is still available.

- Households Supported Through Production of New Units: None. The City of Naperville
 generally does not use CDBG funds to support the production of new housing units. Naperville is
 a largely built out community with high land and construction costs; therefore, production of
 new units with CDBG funds would not be cost-efficient.
- Households Supported Through Rehab of Existing Units:
 - Affordable Owner-Occupied Housing Rehabilitation \$42,851 in PY 2021 funds was added to \$41,750 In PY 2019 funds to create a single-family home repair program for low and moderate-income homeowners. This program was delayed in PY 2020 and PY 2021 due to the COVID pandemic, but is scheduled to begin in PY 2022. An RFP for a subrecipient has been issued and the program is expected to start in Summer, 2022.
 - Special Needs Housing and Supportive Services \$123,800 was allocated to rehabilitate three CILA (Community Integrated Living Arrangements) homes for three organizations providing housing and services to adults with severe physical and mental disabilities. The organizations are Little Friends, Inc. (\$58,000), Ray Graham Association (\$21,000), and UCP Seguin (\$44,800). All three projects were delayed due to COVID restrictions, but are either underway or will be underway this year.
 - Homeless Housing and Supportive Services \$110,000 for energy efficiency rehabilitation projects at an 8-unit apartment building providing transitional housing and social services to formerly homeless households. This project was also delayed, but is now underway.
- Households Supported Through Acquisition of Existing Units: \$125,000 was allocated to
 acquire and rehabilitate a two-bedroom condominium apartment as permanent affordable
 rental housing in an apartment building providing affordable housing to low and moderateincome homeowners and renters with impaired mobility. The purchase and renovation of the
 unit have been completed and a tenant has been secured.

Discuss how these outcomes will impact future annual action plans.

PY 2021 projects continued the City's emphasis on preservation and rehabilitation of existing affordable units, primarily rental units, occupied by vulnerable low and moderate income populations – homeless persons, persons with disabilities and seniors. Projects approved in succeeding years of this Consolidated Plan will continue to emphasize affordable rental housing preservation and rehabilitation, as affordable rental units are the primary means of housing low-income households. The City will continue to support affordable housing for special needs households, and the development of transitional housing and permanent supportive housing for formerly homeless individuals. Increased emphasis will be placed on housing preservation through rehabilitation for low and moderate-income homeowners and development of new affordable units and acquisitions of affordable units, where feasible.

Include the number of extremely low-income, low-income, and moderate-income persons served by each activity where information on income by family size is required to determine the eligibility of the activity.

Number of Households Served	CDBG Actual	HOME Actual
Extremely Low-income	136	0
Low-income	30	0
Moderate-income	13	0
Total	179	0

Table 7 - Number of Households Served

CR-25 - Homeless and Other Special Needs 91.220(d, e); 91.320(d, e); 91.520(c) Evaluate the jurisdiction's progress in meeting its specific objectives for reducing and ending homelessness through:

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

Outreach to homeless and at-risk residents in Naperville is challenging, because there are relatively few visibly homeless or unsheltered people. Homelessness prevention and other emergency assistance services are crucial in reducing homelessness, both because they provide cash and other assistance and because of the opportunities they present to assess the needs of these individuals and refer them to appropriate services.

In PY 2021, the City of Naperville allocated \$65,500 in CDBG funds, supplemented by local Social Services Grant (SSG) funds, to Loaves & Fishes CARES Program's Emergency Financial Assistance homelessness prevention program. Other programs, including social services to persons in emergency housing, were assisted through the City's SSG Program.

Both projects provide supportive services designed to prevent future crises and episodes of homelessness. In addition, social services agencies that provide assistance to very low-income and homeless people, including food assistance, mental health assistance and assistance to homeless youth, either conduct their own individual needs assessments or provide referrals to other agencies.

Addressing the emergency shelter and transitional housing needs of homeless persons

A total of \$110,000 in PY 2021 CDBG entitlement funds were allocated to Bridge Communities, Inc. for a rehabilitation project at an 8-unit apartment building providing transitional housing to approximately eight (8) homeless families. This project was delayed due to the pandemic, but is now underway. Bridge also completed a full upgrade of IT and web infrastructure at its transitional housing apartments using \$30,626.00 in PY 2020 funds.

Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: likely to become homeless after 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); and, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs

The DuPage County Continuum of Care (COC) emphasizes homelessness prevention through providing a comprehensive array of services that begin by "preventing homelessness whenever possible and end with ensuring every resident.... has their basic needs of food, clothing, and housing met along with

achieving their maximum level of self-sufficiency."

In addition to the programs described above, the City also allocated \$84,577 to DuPage PADS to provide job counseling and training to assist homeless people to find work during the pandemic. The 360 Youth Services Program described above, is designed specifically to respond to the needs of homeless youth during the pandemic.

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

Bridge Communities, Inc. – Transitional Housing Rehabilitation received \$110,000 to rehabilitate and 8-unit apartment building used to provide transitional housing to formerly homeless families. Families reside in stable, high-quality housing while participating in Bridge's transitional housing program.

DuPage PADS - Olympus Place Supportive Housing Program received \$14,000 in PY 2021 entitlement grant funds in public service funding to DuPage PADS to support the salaries of staff providing social service assistance to formerly chronically homeless people living at Olympus Place, a supportive housing apartment complex designed to allow formerly chronically homeless people to live independently.

CR-30 - Public Housing 91.220(h); 91.320(j)

Actions taken to address the needs of public housing

There were no traditional public housing developments located in Naperville during Program Year 2020 and none are currently planned.

The City of Naperville is divided between DuPage County and Will County. DuPage County residents are served by the DuPage Housing Authority and Will County residents are served by the Housing Authority of Joliet. The DuPage Housing Authority does provide project-based vouchers to residents in some income-restricted complexes, but does not own or operate these buildings.

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

At this time, the DuPage Housing Authority's programs are limited to the Housing Choice Voucher Program, State of Illinois Rental Housing Support Program and Senior Housing. The housing voucher program in Will County is operated by the Housing Authority of Joliet. As mentioned above, there are no public housing developments in Naperville.

Actions taken to provide assistance to troubled PHAs

The City of Naperville is served by the DuPage Housing Authority and Housing Authority of Joliet. Neither of these agencies are considered "troubled" PHA's.

CR-35 - Other Actions 91.220(j)-(k); 91.320(i)-(j)

Actions taken 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. 91.220 (j); 91.320 (i)

Barriers to affordable housing include a lack of affordable land for new construction, failure to include affordable units in new developments that are built, and a lack of complete understanding of how public policies involving land development impact affordable housing.

In January, 2021, the City Council held an Affordable Housing Workshop to review affordable housing recommendations included in previous fair housing and affordable housing planning documents. At the Workshop, Council voted to adopt an Affordable Housing Work Plan highlighting three recommendations:

- Develop Specific Plan to Preserve Naturally Occurring Affordable Housing (NOAH);
- Establish a Revolving Rehabilitation Loan Fund specifically targeted towards low income seniors
 who currently own in Naperville so that they can make the necessary repairs to their home and
 age in place;
- Conduct a Study on Feasibility of Implementing an Inclusionary Zoning Ordinance (IZO).

During PY 2021, the City continued to move forward with placing the highest emphasis on the rehabilitation grants and the inclusionary zoning ordinance. Although the rehabilitation program was delayed due to the pandemic, the program is being implemented now. Using inclusionary zoning as a starting point, the City has also made significant progress in developing policies to increase the number of affordable housing units.

Actions taken to address obstacles to meeting underserved needs. 91.220(k); 91.320(j)

The City previously identified three major obstacles to meeting underserved needs:

- Lack of public understanding of the existence and needs of underserved population groups
- Lack of focus on providing the resources needed to address underserved needs
- Lack of awareness by persons in need of support about resources that are available

The recent housing studies have increased understanding of the demographic and socio-economic characteristics of underserved populations and their housing and social service needs.

CARES Act expenditures were designed specifically to address underserved needs arising from the COVID-19 pandemic.

Actions taken to reduce lead-based paint hazards. 91.220(k); 91.320(j)

The City of Naperville experiences relatively few incidents of lead poisoning due to the large volume of newer housing in the City and effective regulations that address this issue. The Illinois Department of Public Health – Childhood Lead Poisoning Prevention Program has primary responsibility for the education and screening activities relating to lead hazards. They provide four types of services described below and will continue to provide these services.

Public Information

The Illinois Department of Public Health provides information to the public about the dangers of lead poisoning and how residents can address the issues in their own homes. Flyers are provided on request and distributed through its Childhood Lead Prevention program

Testing for Lead Hazards in the Home

Testing is done in cases where a lead hazard is suspected, or when a child's blood level meets the threshold to require the environmental testing.

Screening for Elevated Blood Levels

Where tests produce evidence of children being exposed to lead hazards, the Illinois Department of Public Health will screen children for lead poisoning.

Counseling

When lead hazards are present or when there are positive tests for lead poisoning, counseling for the family is made available.

Actions Taken

Planning to meet the cost of lead-based services is difficult since there is no realistic way to anticipate the full need or cost of any repair that occurs based on testing. DuPage County and the City provide reference materials and information to people who believe they may have exposure to lead paint as part of their projects. In PY 2019, there were no projects that required lead paint testing or abatement.

Compliance and Monitoring

The City has implemented policies to ensure that the CDBG program is in full compliance with the lead-based paint hazards. The age of the structures where work will be performed is verified before the project starts. Work on structures built before 1978 is required to comply with regulations and take appropriate steps to conduct remediation or follow Safe Housing Rule.

Actions taken to reduce the number of poverty-level families. 91.220(k); 91.320(j)

Naperville's estimated poverty rate in 2020 was approximately 4.41% (U.S. Census, Quick Facts). Though this rate is less than 5% of the population, it means that over 6,500 Naperville residents were living in poverty at the time of the 2020 census. This rate that is represents a 100 percent increase since 2000, a period when the population as a whole increased by about 12.6 percent. With these statistics in mind, the City targeted its anti-poverty efforts towards its most vulnerable populations - homeless households, persons at risk of homelessness, formerly homeless people in need of supportive housing, and extremely low-income households and households in crisis. At this time, the long-term impact of the COVID-19 pandemic is still unknown, though the City will carefully monitor these effects going forward and make adjustments in funding priorities accordingly.

In addition to CDBG funding, The City also allocated \$500,000 in General Fund revenue to the Social Services Grant (SSG) Program. This program provides financial assistance to not-for-profit social service agencies that serve the needs identified in the Consolidated Plan. Funded programs were designed to promote self-sufficiency, assist families in crisis and provide resources for underserved groups, including senior citizens, persons with disabilities and youth.

Actions undertaken in PY 2021 include the following:

- Homelessness Prevention: Loaves & Fishes CARES Program was awarded \$66,000 in PY 2021
 CDBG funding for an Emergency Financial Assistance Program to provide emergency rent and
 utility assistance to prevent evictions and utility shutoffs. All participating households assisted
 are provided with counseling to address financial issues and receive help accessing benefit and
 conducting a job search.
- *Transitional Housing:* Bridge Communities, Inc. was awarded \$110,000 in PY 2021 CDBG funds for rehabilitation of apartments housing 8 formerly homeless families. This program, delayed during the pandemic, has now been completed.
- **Permanent Supportive Housing:** DuPage PADS' Olympus Place Supportive Housing Program was awarded \$14,000 in PY 2021 CDBG funds to provide social services to chronically homeless people rehoused in an independent supportive housing apartment complex.

Actions taken to develop institutional structure. 91.220(k); 91.320(j)

he City consults with local housing and social service agencies to eliminate gaps in services, reduce duplication of programs, and emphasize efficient service delivery for local, state, and federal programs. The City granted \$500,000 from its General Fund to fund social service projects that met the City's funding priorities. This program provides both the City and social service agencies with greater financial flexibility to fund public service projects. The City can spend more to support social services, while reserving CDBG funds for capital projects.

The City also participated in the DuPage County HOME Advisory Commission to learn and provide advice

on how affordable housing programs are implemented county-wide.

Actions taken to enhance coordination between public and private housing and social service agencies. 91.220(k); 91.320(j)

The City of Naperville is a member of the DuPage County Consortium and the HOME Advisory Council. The DuPage County Consortium coordinates the efforts of county-wide networks and coalitions by providing leadership; identifying priority needs, strategies, and funding opportunities; analyzing performance; and sharing knowledge with service providers, including the DuPage County Continuum of Care.

Identify actions taken to overcome the effects of any impediments identified in the jurisdictions analysis of impediments to fair housing choice. 91.520(a)

In PY 2016, City staff worked with a consultant to develop a new Analysis of Impediments to Fair to Housing Choice (AI), which was accepted by the City in May, 2017. The Human Rights and Fair Housing Commission (HRFHC), formerly the Housing Advisory Commission has been tasked with implementing the recommendations of this study, including conducting an annual progress review and setting implementation priorities.

The AI also recommended that the City develop an affordable housing plan and take steps to better integrate housing into the planning process. In PY 2021, Transportation, Engineering & Development Department took active steps to do so, working with a consultant to development an Affordable Housing Plan and Affordable Housing Incentive Program (AHIP).

CR-40 - Monitoring 91.220 and 91.230

Describe the standards and procedures used to monitor activities carried out in furtherance of the plan and used to ensure long-term compliance with requirements of the programs involved, including minority business outreach and the comprehensive planning requirements

All of the City's subrecipients are monitored throughout the program year, though on-site monitoring did not take place in PY 2020 or PY 2021 due to the COVID-19 pandemic.

Prior to project approval, subrecipients are required to submit documentation demonstrating their capacity to manage and complete the project, completeness of their standard procedures, financial soundness, ability to document compliance with a National Objective, and compliance with the Civil Rights Act, EEO, ADA and other federal laws and regulations.

Subrecipients file quarterly reports detailing progress in completing projects. Reports are reviewed by the CDBG coordinator. Issues and questions arising from the reports are discussed with the subrecipient agency and adjustments in procedures are made where necessary. This practice facilitates clear communication between grantee and subrecipient and allows areas of concern to be addressed in a timely manner. In addition, regular communication with subrecipients is maintained throughout the year to check on progress and to answer any questions and to provide guidance on HUD policies and procedures.

Capital improvement projects are coordinated with CDBG coordinator to assure compliance with procurement standards and labor provisions. A pre-construction conference is held with the CDBG coordinator, subrecipient and contractors prior to starting on-site work to explain all applicable labor requirements and to discuss the responsibilities of each party. Each request for payment is reviewed by the CDBG Coordinator, City Clerk and Financial Analyst.

On-site monitoring visits may be conducted with subrecipients following completion of the project. Subrecipients are notified in writing in advance of the monitoring visit and are sent a written follow-up letter of any findings or recommendations. Monitoring visits focus on completeness of documentation, and administrative and financial management systems.

In addition, on-going monitoring is maintained with subrecipients, where necessary, to ensure compliance with relocation, acquisition and other long-term requirements.

Citizen Participation Plan 91.105(d); 91.115(d)

Describe the efforts to provide citizens with reasonable notice and an opportunity to comment on performance reports.

Naperville's Citizen Participation Plan requires the City to provide citizens, public agencies, and other interested parties with reasonable notice and an opportunity to comment on performance reports. The Citizen Participation Plan (CPP) was revised in 2020 to incorporate new procedures to make public participation easier during the COVID-19 pandemic. These procedures included virtual public hearings and reduced public comment periods.

To ensure that citizens, public agencies and other interested parties have reasonable opportunity to examine the Consolidated Annual Performance and Evaluation Report (CAPER), the City takes the following actions upon completion of the draft report:

- 1) Publish a summary of the performance report as a display advertisement in the Naperville Sun newspaper. This ad will describe the performance report and specify where copies of the full report may be examined.
- 2) Ensure copies of the report are available at the 95th Street Library (3015 Cedar Glade Drive), Naper Boulevard Library (2035 S. Naper Boulevard), Nichols Library (200 W. Jefferson), City Clerk's Office at the Naperville Municipal Center (400 S. Eagle) and on the City of Naperville website (www.naperville.il.us/cdbg.aspx).

Once the report has been made available for comment, the City allows a 15-day period for citizens, public agencies and interested parties to respond (may be reduced to 5 days where emergency procedures apply). Comments may be submitted in writing to the CDBG coordinator as well as orally at a public hearing to be held at the conclusion of the public comment period. A summary of comments is attached to the final performance report.

For Program Year 2021, the public comment period and public hearing notice was published in the Naperville Sun on Wednesday, June 8, 2022. The public comment period began on Wednesday, June 8, 2021 and concluded on Wednesday, June 22, 2021. A public hearing on the CAPER was held at the regularly scheduled City Council meeting at 7:00 p.m., June 21, 2021. No public comments were received.

CR-45 - CDBG 91.520(c)

Specify the nature of, and reasons for, any changes in the jurisdiction's program objectives and indications of how the jurisdiction would change its programs as a result of its experiences.

Does this Jurisdiction have any open Brownfields Economic Development Initiative (BEDI) grants?

No

[BEDI grantees] Describe accomplishments and program outcomes during the last year.

CR-45 - CDBG 91.520(c)

Specify the nature of, and reasons for, any changes in the jurisdiction's program objectives and indications of how the jurisdiction would change its programs as a result of its experiences.

The City of Naperville did not change any of its program objectives during PY 2021. The City will continue to implement the AI and use the affordable housing preservation strategies recommended in the NOAH (Naturally Occurring Affordable Housing study) and Inclusionary Zoning Study to determine future policy and programmatic objectives.

Does this Jurisdiction have any open Brownfields Economic Development Initiative (BEDI) grants?

No.

[BEDI grantees] Describe accomplishments and program outcomes during the last year.

The City of Naperville was not a BEDI grantee.

CR-58 - Section 3

Identify the number of individuals assisted and the types of assistance provided

Total Labor Hours	CDBG	HOME	ESG	HOPWA	HTF
	1700	N/A	N/A	N/A	N/A

Table 8 – Total Labor Hours

Qualitative Efforts - Number of Activities by Program	CDBG	HOME	ESG	HOPWA	HTF
	10	N/A	N/A	N/A	N/A

Table 9 – Qualitative Efforts - Number of Activities by Program

Narrative

Program Year 2021 CDBG activities are listed below:

#	Project Name		
1	Bridge Communities -Crabapple Court Window and Door Replacement		
2	DuPage PADS - Olympus Place Supportive Housing Program		
3	Illinois Independent Living Center - Security System Rehabilitation		
4	Kids Above All (ChildServ)		
5	Loaves & Fishes CARES Program - Emergency Financial Assistance		
6	Ray Graham Association - Starling and Swift CILA Kitchen/Bathroom Rehabilitation		
7	Naperville Elderly Homes - Landscape Restoration Project		
8	Northern Illinois Food Bank - LED Lighting Upgrade Project		
9	City of Naperville - Grant Administration		
10	City of Naperville - Paired Real Estate Testing Study		