

CITY OF NAPERVILLE

Scott Wehrl, Mayor

COMMUNITY SERVICES
DEPARTMENT

2025-2029 CDBG
CONSOLIDATED PLAN
2025 ANNUAL ACTION
PLAN (YEAR 1)



Executive Summary

ES-05 Executive Summary – 24 CFR 91.200(c), 91.220(b)

1. Introduction

The City of Naperville is a Community Development Block Grant (CDBG) entitlement community as defined by Title I of the Housing and Community Development Act of 1974. Naperville receives an annual block grant that can be used to address critical and unmet community needs, including housing rehabilitation, public facilities, infrastructure, economic development and public services. Grants are allocated by the U.S. Department of Housing and Urban Development (HUD) on a formula basis.

The Consolidated Plan is a planning document that CDBG entitlement communities are required to submit every five years. This document is designed to help communities to assess their affordable housing, homeless and non-housing community development needs and market conditions, set goals and objectives, and develop funding priorities for their CDBG programs. The most recent Consolidated Plan covered Program Years 2020 - 2024 and the proposed Consolidated Plan will cover Program Years 2025-2029, beginning April 1, 2025 and ending on March 31, 2030.

Naperville is a member of the DuPage County Consortium. Participating in the Consortium enables Naperville residents to benefit from federal funding programs in addition to CDBG.

2. Summary of the objectives and outcomes identified in the Plan Needs Assessment Overview

The Consolidated Plan summarizes the City's non-housing community development needs and assets and presents a Strategic Plan for the 2025-2029 period. The Strategic Plan prioritizes both non-housing community development needs and housing and homeless needs, and presents goals in all three categories. High priority needs and goals are summarized below:

Housing

- **Affordable Renter-Occupied Housing** - Preserve and increase the supply of affordable renter-occupied housing through housing rehabilitation, acquisition and new construction
- **Affordable Owner-Occupied Housing** - Preserve and increase the supply of affordable owner-occupied housing through housing rehabilitation, acquisition and new construction

- **Special Needs Housing** - Preserve and increase the supply of housing with supportive services for special needs populations, including elderly and disabled persons through housing rehabilitation, acquisition and new construction

Neighborhood Investment - Public Improvements, Facilities and Public Services

- **Public Improvements** - Maintain the City's infrastructure through investment in water/sewer, streets and other infrastructure, as needed
- **Public Facilities** - Ensure that public facilities are ADA-compliant and that there are sufficient facilities available for special needs populations, such as elderly persons and persons with disabilities.
- **Public Services** - Provide public services to address the special needs of vulnerable populations, such as the elderly, persons with disabilities, and help low-income residents achieve greater self-sufficiency.

Homeless

Assist homeless individuals and families at all points in the Continuum of Care or cycle of homelessness

- **Homelessness Prevention** - Prevent homelessness through outreach to at-risk households and provide assistance with basic needs, such as rent, mortgage and utility assistance
- **Homeless Housing** - Support housing for the homeless, including emergency housing, transitional housing, and permanent supportive housing for chronically homeless individuals and families
- **Homeless Public Services** - Support public services that help people who are homeless gain life skills and self-sufficiency

3. Evaluation of past performance

The CDBG program provides an extraordinary benefit to the City of Naperville and the City is committed to compliance with all HUD regulations and requirements. From 2020-2024, the City of Naperville used its CDBG funds to assist in the rehabilitation of owner and renter-occupied housing for low and moderate income residents, assisted with acquisition of interim housing and affordable rental housing units, provided for the rehabilitation of transitional housing for homeless people and people with disabilities, upgraded public facilities to improve substandard facility defects and achieve compliance with the Americans with Disabilities Act (ADA), provided emergency rent and utility assistance to households at risk of homelessness and helped provide supportive services to assist formerly homeless households remain housed.

The City of Naperville achieved a timeliness ratio of less than 1.5 times its annual grant allocation in each year between 2020 and 2024.

4. Summary of citizen participation process and consultation process

The Citizen Participation Process is conducted according to public participation policies and procedures detailed in the City's CDBG Standard Operating Procedures manual. The process includes at least two public meetings, hearings and a public comment period for citizens to provide feedback on proposed plans. This year, a public meeting/information session took place on September 12, 2024 and a public hearing will be held on February 4, 2025. Public comments will be received January 2, 2025 to February 4, 2025.

5. Summary of public comments

TBD

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

TBD

7. Summary

During the 2020 - 2024 Consolidated Plan period, the City of Naperville used CDBG funds for more than 50 projects benefitting low and moderate income residents through a variety of activities. Since requests for funding always outpace available resources, the City must allocate funds to the highest priority projects that make the most cost-efficient use of these limited funds. The proposed 2025 - 2029 Consolidated Plan builds on and continues these efforts.

The Process

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

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

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

Agency Role	Name	Department/Agency
CDBG Administrator	NAPERVILLE	Community Grants/Community Services Department

Table 1– Responsible Agencies

Narrative

Naperville Role:

The City of Naperville is a Community Development Block Grant (CDBG) entitlement community as defined by Title I of the Housing and Community Development Act of 1974. This means that Naperville is eligible to receive an annual grant that can be used to address critical and unmet community needs, including those for housing rehabilitation, public facilities, infrastructure, economic development and public services. The CDBG Program is administered by the U.S. Department of Housing and Urban Development (HUD), which allocates CDBG funds annually on a formula basis. Counties and entitlement municipalities are required to submit a Consolidated Plan (ConPlan) every five years.

The City of Naperville Community Services Department has responsibility for implementing Naperville's CDBG program, including administering all grants, preparing the Naperville sections of the Consolidated Plan and preparing Naperville's Annual Action Plan (AAP).

The ConPlan evaluates affordable housing and community development needs and market conditions and develops five-year funding priorities for CDBG. The AAP outlines the actions, activities and programs that the City will undertake during each program year to address the ConPlan priorities and goals. The AAP explains how these projects will move the goals of the ConPlan forward. The Community Services Department works closely with other city departments, including the Transportation, Engineering and Development (TED) Business Group, Department of Public Works and the Finance Department to prepare both the ConPlan and the AAP.

DuPage County Role:

DuPage County is the Lead Agency of the DuPage County HOME Consortium. Naperville is a Participating Jurisdiction in the Consortium. As Lead Agency, the Consortium is responsible for administration of HOME funds available to DuPage County and the Participating Jurisdictions. Membership in the HOME Consortium allows Naperville to access to HOME funding that can be used to finance affordable housing projects that are not eligible for CDBG funding. DuPage County is also responsible for submitting the ConPlan and AAPs on behalf of all members of the Consortium.

Consolidated Plan Public Contact Information

Naperville CDBG Program - Miranda Barfuss, Community Grants Coordinator, City of Naperville, Community Services Department, 400 S. Eagle Street, Naperville, IL 60540, 630-305-5315, barfussm@naperville.il.us

DuPage County HOME Consortium - Mary Keating, Director of Community Services, DuPage County, Department of Community Services-Community Development Office, 421 N. County Farm Road Room 3-100, Wheaton, IL 60187, 630-407-6500, Mary.Keating@dupageco.org

PR-10 Consultation - 91.100, 91.110, 91.200(b), 91.300(b), 91.215(l) and 91.315(l)

1. Introduction

Naperville consults with a wide variety of governmental and non-governmental agencies and organizations, using techniques that include public meetings and hearings, board and commission meetings, task force meetings, interviews, surveys, and review of subrecipient strategic and capital plans. Highlights of consultation efforts and participation include:

- **Public Meeting/Information Session** - A public meeting/information session was held on Thursday, September 12, 2024 to provide an explanation of the Consolidated Plan and Annual Action Plan, and a review of the City's current funding policies and priorities. This also launched a call for projects for the 2025 Program Year.
- **County Consultation** - Through participation in the HOME Advisory Group and the DuPage Continuum of Care, consultation was conducted, as well as an interview with Will County, since Naperville is both counties.
- **City Department and Community Consultation** - Non-housing community development needs were evaluated with consultation across City departments including the Department of Public Works, IT Department, Transportation Engineering and Development (TED) Department, Sustainability Team, and the Naperville Electric and Water Utilities. The Naperville Chamber of Commerce, Naperville Park District, Naperville Public Libraries are also stakeholders consulted in planning.
- **Citizen Consultation** - Naperville conducted a robust and comprehensive Citizen Survey in 2023 with findings informing this plan. In addition, staff consulted with members of the City's Advisory Commission on Disabilities, Human Rights & Fair Housing Commission, Senior Task Force and Accessible Community Task Force. Each entity is comprised of Naperville residents and each provided views and recommendations on housing, public facilities and public services. In addition, CDBG funding applications for 2025 were reviewed, scored and evaluated by a team comprised of representatives from the Human Rights & Fair Housing Commission, the Accessible Community Task Force and the Senior Task Force.
- **Subrecipient Consultation** - Frequent subrecipients of Naperville's CDBG grant funds each submitted 5-year projected plans regarding the capital improvements and public services they intend to apply for in the ConPlan period.
- **Anti-Poverty Strategy** - Meetings with organizations that provide social services, rent and utility assistance, and emergency and transitional housing.

The City of Naperville also consulted with DuPage County and other municipalities through its membership in the HOME Advisory Group and the DuPage Continuum of Care. The HOME Advisory Group advises the County on the use of HOME funds for affordable housing; the Continuum of Care is a

coalition of public and private agencies which develops strategies to meet the needs of people who are homeless in DuPage County.

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

The City of Naperville consults with the DuPage County HOME Consortium and DuPage Housing Authority regarding strategic initiatives to meet housing, health, mental health, education, social services, and community development needs. The DuPage County HOME 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. The City also maintains contact with agencies, through the administration of our other city grant programs and the public throughout the year.

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

The City of Naperville is a member of the DuPage County Continuum of Care, composed of public and private agencies charged with meeting the housing, health, and social service needs of the chronically homeless, families with children, veterans and other homeless populations. The long-term mission of the DuPage County Continuum of Care is to develop and support effective strategies to end homelessness in DuPage County. The DuPage County Department of Community Services is the lead agency for the DuPage County Continuum of Care.

Supporting agencies that implement Continuum of Care policies is a high priority for the City of Naperville's CDBG, Social Service Grant (SSG) and Opioid Remediation grant programs. City staff works closely with subrecipients and grantees to implement the goals of the DuPage County Plan to End Homelessness including homelessness prevention, outreach, rapid rehousing, maintaining/increasing affordable housing, providing supportive services and moving individuals towards self-sufficiency. The City directly funds emergency rent/utility assistance; transitional housing for individuals and families; transitional housing for victims of domestic violence; outreach, counseling and transitional housing for youth; transitional housing and counseling for people recovering from substance abuse; permanent supportive housing for chronically homeless individuals; affordable rental housing rehabilitation; and a wide variety of supportive services including mental health counseling, substance abuse prevention, food assistance and employment counseling.

Continuum of Care agencies the City of Naperville works with and supports directly include:

- Homelessness Prevention - Loaves & Fishes Community Services (persons at-risk of homelessness)
- Emergency Shelter and Transitional Housing - 360 Youth Services (unaccompanied youth/youth in foster care), Bridge Communities (families with children), Kids Above All (unaccompanied youth, young adults, youth in foster care), DuPagePads (homeless individuals and families including chronically homeless, families with children, veterans), Metropolitan Family Services Family Shelter Services (domestic abuse - individuals and families), Serenity House (individuals recovering from substance abuse)
- Permanent Supportive Housing - DuPagePads (Olympus Place - formerly chronically homeless individuals and families, and Scattered Site permanent supportive housing throughout Naperville)

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

The City of Naperville does not receive ESG funds, but is available to provide feedback and assistance with the development of performance standards, evaluation methods, and policies and procedures for HMIS administration through the DuPage Continuum of Care.

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

Table 2– Agencies, groups, organizations who participated

1	Agency/Group/Organization	360 Youth Services
	Agency/Group/Organization Type	Housing Services-Children
	What section of the Plan was addressed by Consultation?	Homelessness Strategy Homelessness Needs - Unaccompanied youth
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Public meeting - provide information, inclusion of housing and social service needs of unaccompanied youth in funding programs
2	Agency/Group/Organization	BRIDGE COMMUNITIES
	Agency/Group/Organization Type	Housing Services - Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy Homeless Needs - Families with children Anti-poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Public meeting - provide information, focus group to discuss needs/recommend strategies for improved homeless housing and services, inclusion in funding programs
3	Agency/Group/Organization	Career and Networking Center
	Agency/Group/Organization Type	Services-Employment
	What section of the Plan was addressed by Consultation?	Economic Development Anti-poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Public meeting - provide information. Inclusion in funding programs.
4	Agency/Group/Organization	DUPAGE PADS
	Agency/Group/Organization Type	Housing Services - Housing Services-homeless

	What section of the Plan was addressed by Consultation?	Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Anti-poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Public meeting - provide information, funding of services for chronically homeless, shelter services and management and rehabilitation of permanent supportive housing
5	Agency/Group/Organization	DuPage Senior Citizens Council
	Agency/Group/Organization Type	Services-Elderly Persons
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs Anti-poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Public meeting - provide information, local funding of Meals-on-Wheels, food services, wellness checks and repair services for seniors
6	Agency/Group/Organization	Riverwalk Adult Day Services
	Agency/Group/Organization Type	Services-Elderly Persons Services-Persons with Disabilities
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Public meeting - provide information, local funding of services for elderly and disabled persons
7	Agency/Group/Organization	Family Shelter Service of Metropolitan Family Services DuPage
	Agency/Group/Organization Type	Housing Services-Victims of Domestic Violence Services - Victims

	What section of the Plan was addressed by Consultation?	Homelessness Strategy Homeless Needs - Families with children Non-Homeless Special Needs Anti-poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Public meeting - provide information, local funding of services for domestic violence victims
8	Agency/Group/Organization	ILLINOIS INDEPENDENT LIVING CENTER, KATHARINE MANOR APARTMENTS
	Agency/Group/Organization Type	Housing Services - Housing Services-Persons with Disabilities
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy Non-Homeless Special Needs
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Public meeting - provide information. Funding of capital improvements of housing for persons with disabilities.
9	Agency/Group/Organization	Kids Above All (formerly ChildServ)
	Agency/Group/Organization Type	Housing Services - Housing Services-Children
	What section of the Plan was addressed by Consultation?	Homelessness Strategy Homelessness Needs - Unaccompanied youth
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Public meeting - provide information. Capital improvements and social service funding for abused, neglected youth
10	Agency/Group/Organization	Loaves and Fishes
	Agency/Group/Organization Type	Services - Housing Services-Employment
	What section of the Plan was addressed by Consultation?	Homelessness Strategy Anti-poverty Strategy Services - food assistance

	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Public meeting - provide information, institutional coordination, funding for homelessness prevention, food assistance and emergency services
11	Agency/Group/Organization	Naperville Elderly Homes
	Agency/Group/Organization Type	Housing Services - Housing Services-Elderly Persons
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy Elderly Housing and Services
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Email and in-person consultation on projects and application assistance. Capital funding of housing and services for low-income elderly.
12	Agency/Group/Organization	Sanjeevani 4 U
	Agency/Group/Organization Type	Services-Victims of Domestic Violence Services-Health Services-Minority Women
	What section of the Plan was addressed by Consultation?	Public services - Minority Women
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Public meeting - provide information. Local funding for domestic violence/mental health services for Asian-American Women
13	Agency/Group/Organization	RAY GRAHAM ASSOCIATION FOR PEOPLE WITH DISABILITIES
	Agency/Group/Organization Type	Housing Services - Housing Services-Persons with Disabilities
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs Housing and services for adults with disabilities
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Public meeting - provide information. Local funding for capital improvements for housing of persons with disabilities

14	Agency/Group/Organization	SENIOR HOME SHARING, INC.
	Agency/Group/Organization Type	Housing Services - Housing Services-Elderly Persons
	What section of the Plan was addressed by Consultation?	Senior housing and services
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Public meeting - provide information. Local funding of services for elderly persons in shared housing
15	Agency/Group/Organization	Turning Pointe Autism Foundation
	Agency/Group/Organization Type	Services-Persons with Disabilities
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Public meeting - provide information. Additional services for adults with disabilities.
16	Agency/Group/Organization	YMCA of Metropolitan Chicago
	Agency/Group/Organization Type	Services-Children
	What section of the Plan was addressed by Consultation?	Services - childcare
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Public meeting - provide information. Local funding for after-school services for low-income children.
17	Agency/Group/Organization	UCP Seguin Services, Inc.
	Agency/Group/Organization Type	Housing Services - Housing Services-Persons with Disabilities
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Public meeting - provide information. Funding of housing and services for adults with cerebral palsy.

18	Agency/Group/Organization	LITTLE FRIENDS
	Agency/Group/Organization Type	Housing Services - Housing Services-Persons with Disabilities
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Public meeting - provide information. Additional services for adults with disabilities.
19	Agency/Group/Organization	Samaritan Interfaith Counseling
	Agency/Group/Organization Type	Services-Health Services - mental health
	What section of the Plan was addressed by Consultation?	Community Mental Health Needs
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Public meeting - provide information. Funding of mental health services for low and moderate income populations
20	Agency/Group/Organization	Teen Parent Connection
	Agency/Group/Organization Type	Services-Children Services - Teen Parents
	What section of the Plan was addressed by Consultation?	Anti-poverty Strategy Youth and Family Services
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Public meeting - provide information. Funding of services to young parents and families.
21	Agency/Group/Organization	YWCA OF METROPOLITAN CHICAGO
	Agency/Group/Organization Type	Services-Children Services - Families
	What section of the Plan was addressed by Consultation?	Anti-poverty Strategy Public Services - Youth and Families

	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Public meeting - provide information. Coordination of services for families
22	Agency/Group/Organization	KidsMatter
	Agency/Group/Organization Type	Services-Children
	What section of the Plan was addressed by Consultation?	Services - Youth and Families
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Public meeting - provide information. Additional services for youth and families
23	Agency/Group/Organization	DUPAGE COUNTY COMMUNITY SERVICES DEPARTMENT
	Agency/Group/Organization Type	Housing Other government - County Planning organization
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy Housing programs
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Discussion on use of CDBG funds, CDBG programs, improved coordination of CDBG planning activities
24	Agency/Group/Organization	HOME Advisory Group
	Agency/Group/Organization Type	Housing Other government - County Other government - Local Planning organization
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy Market analysis
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Monthly meeting of members of the DuPage County HOME Consortium. Exchange information and adopt changes to HOME/CDBG programs and policies when necessary

25	Agency/Group/Organization	HOPE Fair Housing Center
	Agency/Group/Organization Type	Housing Service-Fair Housing Regional organization Planning organization
	What section of the Plan was addressed by Consultation?	Fair housing
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Coordination of fair housing regional efforts and impediments to fair housing choice
26	Agency/Group/Organization	Evergreen Real Estate Group
	Agency/Group/Organization Type	Housing Services-Elderly Persons Affordable housing developer
	What section of the Plan was addressed by Consultation?	Affordable housing
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Consultation on redevelopment and improvements to low-income senior housing
27	Agency/Group/Organization	Gorman & Company
	Agency/Group/Organization Type	Housing Services-Elderly Persons Services-Persons with Disabilities Affordable housing developer
	What section of the Plan was addressed by Consultation?	Affordable housing
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Consultation on redevelopment and improvements to low-income senior and disabled individual housing. Developing a facility in Naperville.
28	Agency/Group/Organization	CITY OF AURORA
	Agency/Group/Organization Type	Other government - Local

	What section of the Plan was addressed by Consultation?	Homelessness Strategy Anti-poverty Strategy Non-housing community development
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Virtual public meeting - providing information. Review Annual Action Plan. Provide notice of public meetings and availability of draft plans.
29	Agency/Group/Organization	WILL COUNTY
	Agency/Group/Organization Type	Housing Other government - County Planning organization
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Homelessness Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Meeting on community needs for ConPlan development, discussion of use of CDBG funds, CDBG programs, improved coordination of CDBG planning activities
30	Agency/Group/Organization	Continuum of Care Agencies
	Agency/Group/Organization Type	Regional organization Planning organization
	What section of the Plan was addressed by Consultation?	Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Meetings - provide information. Funding to agencies for homeless housing and services in coordination with CoC strategies
31	Agency/Group/Organization	Human Rights & Fair Housing Commission
	Agency/Group/Organization Type	Other government - Local
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Fair housing strategy and investigation

	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Commission meetings - provide information. Planning and implementation of fair and affordable housing strategies
32	Agency/Group/Organization	Senior Task Force
	Agency/Group/Organization Type	Other government - Local
	What section of the Plan was addressed by Consultation?	Senior housing and services
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Monthly meetings - planning for senior housing and services in Naperville
33	Agency/Group/Organization	Naperville Development Partnership
	Agency/Group/Organization Type	Business and Civic Leaders
	What section of the Plan was addressed by Consultation?	Economic Development
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Meetings, strategies for small business assistance
34	Agency/Group/Organization	Naperville Area Chamber of Commerce
	Agency/Group/Organization Type	Business and Civic Leaders
	What section of the Plan was addressed by Consultation?	Economic Development
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Meetings. Strategies for small business assistance
35	Agency/Group/Organization	City of Naperville Department of Public Works
	Agency/Group/Organization Type	Other government - Local Grantee Department
	What section of the Plan was addressed by Consultation?	Non-housing community development

	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Meetings. Planning for public improvements in low-moderate income neighborhoods and ADA accessibility on public property
36	Agency/Group/Organization	City of Naperville TED Business Group
	Agency/Group/Organization Type	Other government - Local Planning organization Grantee Department
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Non-housing community development
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Meetings. Planning for housing and community development strategies. Leadership over Affordable Housing Plan.
37	Agency/Group/Organization	CHAD
	Agency/Group/Organization Type	Housing Services - Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Affordable Housing
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Meetings. Planning for acquisition of single-family homes for affordable rental housing
38	Agency/Group/Organization	Chicago Metropolitan Agency for Planning (CMAP)
	Agency/Group/Organization Type	Regional organization Planning organization
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Market Analysis Affordable housing strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Meetings. Development of affordable housing strategies

39	Agency/Group/Organization	S.B. Friedman Development Advisors, LLC
	Agency/Group/Organization Type	Regional organization Planning organization
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Market Analysis Affordable housing strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Meetings. Development of affordable housing strategies and contracted for Naperville's affordable housing plan.
40	Agency/Group/Organization	Indian Prairie Educational Foundation
	Agency/Group/Organization Type	Services-Children Services-Education Foundation
	What section of the Plan was addressed by Consultation?	Homeless Needs - Families with children Anti-poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Public meeting - provide information. Funding of educational services to low and moderate income families in District 204 schools
41	Agency/Group/Organization	DuPage Health Coalition
	Agency/Group/Organization Type	Services-Health Health Agency
	What section of the Plan was addressed by Consultation?	Services - healthcare for low income
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Public meeting - provide information, funding of healthcare services to low and moderate income families
42	Agency/Group/Organization	Metropolitan Asian Family Services
	Agency/Group/Organization Type	Services-Elderly Persons Services - food assistance
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs Anti-poverty Strategy Services - Elderly

	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Public meeting - provide information. Local funding of meal delivery and mental health services for seniors
43	Agency/Group/Organization	Alive NaperBridge
	Agency/Group/Organization Type	Services-Children
	What section of the Plan was addressed by Consultation?	Services - youth
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Public meeting - provide information. Additional services for youth.
44	Agency/Group/Organization	Community Access Naperville
	Agency/Group/Organization Type	Services-Persons with Disabilities
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Public meeting - provide information. Additional services for children and adults with disabilities.
45	Agency/Group/Organization	NAPERVILLE HERITAGE SOCIETY
	Agency/Group/Organization Type	Services-Education
	What section of the Plan was addressed by Consultation?	Non-housing community development
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Public meeting - provide information. Consultation on ADA accessibility on public property.
46	Agency/Group/Organization	Stonybrook Center
	Agency/Group/Organization Type	Health Agency Services - substance use support
	What section of the Plan was addressed by Consultation?	Services - substance use and abuse support

	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Public meeting - provide information. Local funding of services for adults recovering from substance abuse
47	Agency/Group/Organization	DUPAGE HOUSING AUTHORITY
	Agency/Group/Organization Type	PHA
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Consultation - affordable housing plans and going community housing needs
48	Agency/Group/Organization	Rebuilding Together Aurora
	Agency/Group/Organization Type	Housing Services - Housing Services-Elderly Persons Services-Persons with Disabilities
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Lead-based Paint Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Public meeting - consultation and subrecipient administering City of Naperville single family home repair program

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

Community Service Council of Will County - attempted consultation, however, they appear to have closed without notice.

The City of Naperville also attempted to consult with a wide variety of nonprofit agencies and local organizations through the public meeting held in September. All Naperville grantees and subrecipients were invited to attend. No agency types were intentionally excluded from consultation.

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?
Continuum of Care	DuPage Continuum of Care	Needs Assessment/Housing Market Analysis/Goals and Objectives
Comprehensive Master Plan Update	City of Naperville	Needs Assessment/Housing Market Analysis/Goals and Objectives
Community Survey	City of Naperville	Needs Assessment/Housing Market Analysis/Goals and Objectives
Affordable Housing Plan	City of Naperville	Needs Assessment/Housing Market Analysis/Goals and Objectives

Table 3– Other local / regional / federal planning efforts

Describe cooperation and coordination with other public entities, including the State and any adjacent units of general local government, in the implementation of the Consolidated Plan (91.215(I))

Naperville works closely with DuPage County through participation in monthly HOME Consortium meetings. The City seeks input from the City of Aurora and Will County via public hearings/meetings involving the CDBG program. The City will continue its efforts to collaborate with other local, regional, state and federal agencies when appropriate to develop future projects, improve efficiency and impact, and reduce the duplication of efforts.

Narrative

N/A

PR-15 Citizen Participation - 91.105, 91.115, 91.200(c) and 91.300(c)

1. Summary of citizen participation process/Efforts made to broaden citizen participation

Summarize citizen participation process and how it impacted goal-setting

The City of Naperville encourages residents, public service organizations and other interested parties to participate in the development of the Consolidated Plan and Annual Action Plans by attending public meetings and public hearings held at various stages of plan development.

The City of Naperville opened its public participation process for the 2025-2029 Consolidated Plan and 2025 Annual Action Plan with a Public Meeting/Information Session on September 12, 2024 from 11:00 AM - 12:00 PM at the Naperville Municipal Center. City staff provided an overview of the CDBG program as well as the City's Social Service Grant and Opioid Remediation Grant programs and the Consolidated Plan and Annual Action Plan, including funding priorities, application procedures, timelines, evaluation criteria and updates from previous years. The Public Meeting/Information Session was publicized in advance on the City website, through emails to previous applicants and new prospects, and a community-wide press release to local media outlets. Materials presented at the public meeting, including PowerPoint presentations and applications, were available on the website immediately following the meeting. Twenty nine organizations attended the meeting and had the opportunity to comment and ask questions on community development priorities, plans and programs. City staff was also available to answer additional questions and provide technical assistance prior to the application deadline on October 25, 2024.

The City undertook extensive consultation with government and non-profit organizations, including city departments, boards and commissions, task forces, housing and social service agencies and advocacy organizations.

A notice announcing the public comment period and public hearing for the City's Consolidated Plan and Annual Action Plan was published in the Naperville Sun on January 1, 2025. The notice included the date, time and location of the public hearing, dates of the public comment period, public review locations and information on how to submit comments. The Program Year 2025 - 2029 Consolidated Plan and Program Year 2025 Annual Action Plan were posted on the City of Naperville website, at the Naperville Municipal Center and at all three Naperville Public Library locations from January 2, 2025 to February 4, 2025.

A public hearing to hear citizen comments on the plan will be held at the regularly scheduled City Council meeting on Tuesday, February 4, 2025.

Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
1	Public Meeting	Non-targeted/broad community	A total of 23 organizations attended the public meeting/information session on September 12, 2024	Attendees commented on the priorities and asked questions regarding programs, evaluation criteria and application submission	All questions were answered in as much detail as possible. No comments or questions were declined.	https://www.naperville.il.us/government/grants/community-development-block-grant-fund/
2	Public Hearing	Non-targeted/broad community	The public hearing will be held during the regularly scheduled City Council meeting on February 4, 2025.	TBD	TBD	https://www.naperville.il.us/government/grants/community-development-block-grant-fund/

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	Newspaper Ad	Non-targeted/broad community	A press release announcing the public meeting and call for projects for the CDBG fund and other City of Naperville grant funds was issued on 08/21/24	Individual organizations contacted city staff directly to inquire about required attendance at the meeting and other application and eligibility questions	All questions were answered in as much detail as possible. No comments or questions were declined.	

4	Public Comment Period	Non-targeted/broad community	The public comment period was advertised in the Naperville Sun on January 1, 2025 and will be open from January 2, 2025 to February 4, 2025. The Consolidated Plan and Annual Action Plan were posted on the City's website and hard copies were available for review at the Naperville Municipal Center and three Naperville Public Library locations	TBD	TBD	
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Table 4– Citizen Participation Outreach

Needs Assessment

NA-05 Overview

Needs Assessment Overview

The City of Naperville has identified Non-Housing Community Development needs in three categories: public facilities, public improvements/infrastructure, and public services. The City will use these priorities as a guide while evaluating projects for CDBG funding in the 2025-2029 period.

If the PJ will establish a preference for a HOME TBRA activity for persons with a specific category of disabilities (e.g., persons with HIV/AIDS or chronic mental illness), describe their unmet need for housing and services needed to narrow the gap in benefits and services received by such persons. (See 24 CFR 92.209(c)(2) (ii))

NA-50 Non-Housing Community Development Needs - 91.415, 91.215 (f)

Describe the jurisdiction's need for Public Facilities:

Public facility needs are ranked as low, medium or high and the following were ranked high or medium: removal of architectural barriers and compliance with ADA requirements, rehabilitation of existing facilities, acquisition of facilities for group homes for disabled individuals and transitional facilities for homeless individuals and families. Needs fall into three categories:

- Facilities to serve populations that are either growing, underserved and/or have special needs that may require specially-designed facilities: These populations include seniors and people with disabilities.
- Needs that affect all type of Public Facilities: Needs include removal of remaining architectural barriers in all public facilities and ensuring that all public facilities meet current ADA standards, and rehabilitation of existing facilities as needed.
- Facilities located in specific neighborhoods/geographic areas: these facilities may include neighborhood facilities, such as learning centers, family service centers, parks and recreation facilities in low and moderate income concentration areas

How were these needs determined?

The Community Services Department conducted consultation with City of Naperville Departments including the Department of Public Works and the Transportation, Engineering and Development (TED) Business Group. Consultation was also conducted with the Advisory Commission on Disabilities, Human Rights & Fair Housing Commission, Senior Task Force and the Accessible Community Task Force. CDBG subrecipients were also surveyed and consulted, as well as other local government agencies including the Naperville Park District, the Naperville Area Chamber of Commerce and area social service agencies.

Describe the jurisdiction's need for Public Improvements:

One of Naperville's highest priority public improvements and infrastructure needs is for replacement of all lead water service lines. The City's Lead Service Line Replacement Program is a City initiative to replace all known lead service lines starting in 2024 and continuing as long as it takes to remove all lead service lines. Through the program, City contractors replace the entire length of the water service line from the water main to inside the residence at no cost to the homeowner. Lead pipe removal is required by law, though the water supplied by the City complies with all Illinois Environmental Protection Agency standards, including those for lead. There is no lead situation affecting the quality of Naperville's water supply, which is regularly treated to prevent lead from the pipes from leaching into the water, however, lead service lines could pose a public health hazard under certain conditions and municipalities are required by state law to replace all known lead service lines. Street and street lighting repairs are

ongoing needs. Water main replacements are a significant priority for the City of Naperville Capital Improvement Program as well as the Annual Street Maintenance Program. The City of Naperville needs to maintain 514 miles of sewer pipe, 1,026 miles of stormwater pipe, 684 miles of water main, 197 lane miles of street not including any state or county roads and highways, 14 bridges and 909 miles of sidewalk and shared-use side paths.

How were these needs determined?

City of Naperville departments determine their needs and their funding requirements as part of the annual budget process. The City of Naperville's Capital Improvement Program has its annual priorities determined through this process. The Departments that consulted on the Capital Improvement Program as well as with the Community Services Department in development of this ConPlan are: Department of Public Works; Transportation Engineering and Development (TED) Business Group, Water Utility and the Electric Utility.

Describe the jurisdiction's need for Public Services:

Public services funding is in high demand in the City of Naperville. The need has consistently exceeded the dollars available through CDBG funding. The demand for services suggest that more funding is needed to help residents in a wide range of needs from basic food, shelter and safety needs to legal support and mental health care. The City-funded Social Service Grant was established to help meet residents' social service needs, allowing CDBG funds to be used primarily for capital projects. These projects are designed to allow municipal agencies and nonprofits improve their facilities for the benefit of low and moderate income and special needs clients. The City plans to continue this pattern of funding, also using CDBG funds for public services in the prevention of homelessness, as available.

Public service needs are highest for mental health services and the growing population of senior citizens and people with disabilities. These needs have also been identified by area health care providers and the Naperville Police and Naperville Fire Departments. In addition, medium needs have been identified in areas of substance abuse services and counseling, youth services, transportation services, emergency and transitional housing and emergency assistance funds and food assistance.

How were these needs determined?

Municipal agencies and local social service providers have maintained statistical information on various issue areas, such as substance abuse, mental health issues, and use of rent/utility assistance and food assistance. Statistical information is compared over time to determine trends and priority areas. In addition, the City's Social Service Grant program annually identifies funding priorities and gathers information and data from funded entities. Most recently, the priority services identified have been emergency services, senior services, services for special needs populations, youth services and services

designed to promote self-sufficiency. Special set-asides have been added for increased mental health services.

Based on the needs analysis above, describe the State's needs in Colonias

Housing Market Analysis

MA-05 Overview

Housing Market Analysis Overview:

The City of Naperville Priorities Plan presents the following brief overview of the Naperville housing market:

- The City has approximately 39,254 owner-occupied housing units with the majority (49.9%) at a \$300,000 - \$499,999 value, second (26.3%) at a \$500,000 - \$999,999 value, and third (11.4%) at a \$200,000 - \$299,999 value.
- 72.3% of housing units have a mortgage
- Average family size is 3.36 individuals and average household size is 2.87. There are approximately 48,312 households in Naperville.
- The average cost of living for housing is higher (173.6) than that of the US average (100)
- Median list price for a home in Naperville is \$472,000, which is higher than DuPage County overall (\$346,500) and Will County overall (\$269,800), as well as significantly higher than the overall Chicago metro area (\$260,000)
- Median monthly rent is \$1,516 and renter-occupied units are 12,686, or 23% of all Naperville housing units
- 54.8% of the housing stock was built between 1980-1999 (29,947 units), 3.5% was built prior to 1950 (1,926 units) and 3.9% was built since 2010 and the great recession (2,124)
- There are 8 age restricted 55+ communities in Naperville, 10 assisted living communities and 12 24-care/in-home facilities. The average cost of assisted living is \$4,097 per month, slightly higher than the national average of \$4,000 per month
- Approximately 20-22% of homeowners and 38-44% of renters are paying more than 30% of income on housing costs
- The lack of developable land has increased property values, making it difficult to build new affordable housing. Over the long term, meeting projected demand for housing would require construction of approximately 510-565 units per year. Actual construction is approximately 340 per year. An estimated 6,500 units would be needed by 2040 to alleviate housing cost burdens for households at lower incomes.

MA-45 Non-Housing Community Development Assets - 91.410, 91.210(f)

Introduction

Naperville is the fourth largest city in Illinois with nearly 150,000 residents. Located 30 miles west of Chicago in both DuPage and Will Counties, Naperville's economy has benefited from its proximity to the 1-88 tollway and the Illinois Technology and Research Corridor. The economy is well-diversified and includes business and professional, scientific and technical services, finance and insurance, as well as major corporate headquarters. The city's financial health has also enabled it to attract numerous retail establishments, restaurants and entertainment venues. The civilian employed population in Naperville 16 years and older is 79,474 (69.1%), with approximately 3,188 unemployed and 69 in the armed forces. The Naperville unemployment rate is 3.4%, lower than DuPage County and Will County. The per capita income of Naperville is \$55,227, median household income is \$64,659 and median family income is \$147,937. All three income numbers are higher than DuPage County and Will County overall. Naperville's population below the poverty line is 4.3%, lower than DuPage County and Will County overall.

Economic Development Market Analysis

Business Activity

Business by Sector	Number of Workers	Number of Jobs	Share of Workers %	Share of Jobs %	Jobs less workers %
Agriculture, Mining, Oil & Gas Extraction	146	39	0	0	0
Arts, Entertainment, Accommodations	6,318	8,523	8	13	5
Construction	1,811	1,689	2	3	1
Education and Health Care Services	17,294	14,716	23	22	-1
Finance, Insurance, and Real Estate	8,735	6,042	11	9	-2
Information	2,135	1,356	3	2	-1
Manufacturing	8,396	2,007	11	3	-8
Other Services	2,728	2,896	4	4	0
Professional, Scientific, Management Services	13,979	14,562	18	22	4
Public Administration	1,766	117	2	0	-2
Retail Trade	6,428	10,272	8	15	7
Transportation and Warehousing	3,699	1,238	5	2	-3

Business by Sector	Number of Workers	Number of Jobs	Share of Workers %	Share of Jobs %	Jobs less workers %
Wholesale Trade	2,851	2,893	4	4	0
Total	76,286	66,350	--	--	--

Table 5 - Business Activity

Data Source Comments:

Labor Force

Total Population in the Civilian Labor Force	80,346
Civilian Employed Population 16 years and over	79,474
Unemployment Rate	3.40
Unemployment Rate for Ages 16-24	16.58
Unemployment Rate for Ages 25-65	3.97

Table 6 - Labor Force

Data Source Comments:

Occupations by Sector	Number of People
Management, business and financial	11,974
Farming, fisheries and forestry occupations	120
Service	2,345
Sales and office	17,991
Construction, extraction, maintenance and repair	4,107
Production, transportation and material moving	7,709

Table 7 – Occupations by Sector

Data Source Comments:

Travel Time

Travel Time	Number	Percentage
< 30 Minutes	32,675	50%
30-59 Minutes	20,875	32%
60 or More Minutes	12,455	19%
Total	66,005	100%

Table 8 - Travel Time

Data Source Comments:

Education:

Educational Attainment by Employment Status (Population 16 and Older)

Educational Attainment	In Labor Force		Not in Labor Force
	Civilian Employed	Unemployed	
Less than high school graduate	1,305	80	440
High school graduate (includes equivalency)	4,265	165	1,450
Some college or Associate's degree	9,900	620	2,395
Bachelor's degree or higher	48,705	1,500	8,535

Table 9 - Educational Attainment by Employment Status

Data Source: 2016-2020 ACS

Educational Attainment by Age

	Age				
	18-24 yrs	25-34 yrs	35-44 yrs	45-65 yrs	65+ yrs
Less than 9th grade	92	244	495	285	819
9th to 12th grade, no diploma	815	113	165	520	450
High school graduate, GED, or alternative	2,990	1,545	845	3,485	3,415
Some college, no degree	4,270	1,910	1,445	5,530	3,035

	Age				
	18–24 yrs	25–34 yrs	35–44 yrs	45–65 yrs	65+ yrs
Associate's degree	645	595	784	2,650	1,340
Bachelor's degree	2,765	7,965	8,860	17,190	5,425
Graduate or professional degree	140	4,000	8,130	12,585	4,740

Table 10 - Educational Attainment by Age

Data Source: 2016-2020 ACS

Educational Attainment – Median Earnings in the Past 12 Months

Educational Attainment	Median Earnings in the Past 12 Months
Less than high school graduate	64,036
High school graduate (includes equivalency)	154,141
Some college or Associate's degree	186,302
Bachelor's degree	322,801
Graduate or professional degree	430,817

Table 11 – Median Earnings in the Past 12 Months

Data Source: 2016-2020 ACS

Based on the Business Activity table above, what are the major employment sectors within your jurisdiction?

The top employment sectors of Naperville residents are:

1. Educational services and healthcare and social assistance
2. Professional, scientific, management, administrative, and waste management services
3. Finance and insurance, and real estate, rental and leasing
4. Manufacturing
5. Retail trade

Describe the workforce and infrastructure needs of the business community:

Educational services, healthcare, social assistance, professional, scientific, management and administrative occupations are the sectors that predominate the Naperville workforce. The majority of these jobs require extensive training and education. Naperville appears to be able to attract employees with the necessary level of education and training, though many Naperville workers, approximately 49%, do not live in the City. Our Comprehensive Master Plan assessment states that Naperville retail leads all Illinois suburbs in retail and food/drink sales. Downtown Naperville's success will continue to attract additional investment and activity to the City. Corridor redevelopment should include mixed use development with residential components as well as entertainment and cultural uses. Increased housing diversity, including different price points, housing types and locations, will provide options that appeal to a variety of income levels, including young families and aging residents. Growing diversity may increase demand for specific services and housing types, such as accessory dwelling units. Naperville's office market is healthy with relatively low vacancy rates and average rents. The office market has been relatively stable. Naperville's location will continue to position the City to capture a proportionate share of regional demand for industrial space. Naperville's industrial market outperforms the larger regional submarket with lower vacancy and higher rent per square foot. Given existing office uses, however, and the lack of developable land, new large-scale office buildings are not preferred or market viable. Focus should be directed to ensuring existing office buildings remain desirable and continue to meet the needs of current and future tenants. With this in mind, several of Naperville's large office buildings have recently been torn down or broken into smaller units in order to be more viable for businesses. Renovations of existing office buildings utilize modern designs, new and updated building materials, floor plan modifications, technology and infrastructure upgrades, site improvements to increase parking and amenities like recreation and leisure spaces.

Describe any major changes that may have an economic impact, such as planned local or regional public or private sector investments or initiatives that have affected or may affect job and business growth opportunities during the planning period. Describe any needs for workforce development, business support or infrastructure these changes may create.

Naperville experienced high growth during the 1990's and 2000's and is rapidly approaching buildout. As a result, most new development will result from rehabilitation or replacement of aging buildings in already developed areas. These factors may make new commercial development more expensive and is likely to create a demand for more dense development. The high cost of vacant land also creates a barrier to developing and maintaining affordable housing, which will be necessary for supplying housing for younger workers, workers in lower paying sectors, first-time homebuyers, seniors and renters. Naperville has also been experiencing population growth and ongoing demographic changes including an aging population, a growing Asian population and less age diversity than the nation as a whole. Naperville's population grew 5.42% from 2010 to 2020. Our age diversity index is .87. The median age in Naperville is 39.1 and the AARP livability index score is 57 out of 100.

How do the skills and education of the current workforce correspond to employment opportunities in the jurisdiction?

Many of Naperville's occupations and industries require significant technical skills - computers/information technology, engineering, education, management, finance and healthcare. Most of these fields require a bachelor's degree and/or specialized and advanced training. Naperville residents include a high percentage of highly-educated people with 68.2% having at least a bachelor's degree and more than 30% of those with a graduate or professional degree. Our employment inflow and outflow show that 43% of residents live in Naperville, but are employed outside the City with an average commute time of 32.2 minutes.

Describe any current workforce training initiatives, including those supported by Workforce Investment Boards, community colleges and other organizations. Describe how these efforts will support the jurisdiction's Consolidated Plan.

Most workforce training initiatives are coordinated at the County level, involving partnerships between state and county agencies, economic development agencies, educational institutions and labor organizations. The availability of these resources has allowed Naperville to focus the use of its CDBG funds on housing, infrastructure and public facilities rather than economic development and workforce training activities. Naperville will work to ensure that local nonprofits that serve low and moderate income populations are aware of, and able to access, workforce training initiatives on behalf of their clients. Key workforce training initiatives are coordinated through the DuPage Workforce Board and the WorkNet DuPage Career Center.

Does your jurisdiction participate in a Comprehensive Economic Development Strategy (CEDs)?

No

If so, what economic development initiatives are you undertaking that may be coordinated with the Consolidated Plan? If not, describe other local/regional plans or initiatives that impact economic growth.

Naperville does not participate in a Comprehensive Economic Development Strategy (CEDs). At this time, Naperville does not plan to coordinate any economic development initiatives with the 2025-2029 Consolidated Plan. A regional plan that may impact economic growth is *GO to 2025*, developed by Chicago Metropolitan Agency for Planning (CMAP). The plan establishes coordinated strategies to improve transportation, housing, economic development, open space and sustainability throughout northwestern Illinois.

The Naperville Development Partnership is the lead agency promoting economic development in the City of Naperville. The partnership is a public/private organization with a mission of enhancing the economic vitality of Naperville and maintaining its quality of life through retention and expansion of existing businesses, and attraction of new businesses to the community. Other agencies promoting Naperville's economic development are the award-winning Naperville Area Chamber of Commerce and Choose DuPage, a countywide organization dedicated to establishing DuPage County as a premier global business location by working to expand and diversify the county's economy. Choose DuPage supports municipal economic development initiatives to attract and retain businesses and address policy issues critical to the needs of businesses.

Discussion

Though economic development is not a priority of the Naperville CDBG program, the City will continue to monitor economic conditions and proposed projects to identify opportunities that could benefit or offer employment to low and moderate income residents. The City will also support housing affordability activities that support economic development.

MA-50 Needs and Market Analysis Discussion

Are there areas where households with multiple housing problems are concentrated? (include a definition of "concentration")

The primary housing problem in Naperville is cost-burden due to a lack of affordable housing. Median owner-occupied home value is approximately \$399,000 requiring an income of approximately \$100,000/year to be affordable (paying no more than 30% of income for housing costs); median rent in Naperville requires an income of approximately \$57,000/year. Approximately 20-22% of homeowners and 38-44% of renters were paying more than 30% of income on housing costs. Cost-burdened households are most likely to be found in neighborhoods with lower median incomes and with higher percentages of rental housing, though Naperville also has higher-end rental apartment complexes that generally do not attract lower-income tenants. Naperville's pattern of rapid development in recent decades resulted in many instances in which newer, more expensive housing was built in close proximity to smaller, older housing (i.e. "teardowns"). This is especially the case in older neighborhoods near downtown Naperville.

Naperville's housing needs assessments find that cost-burdened owner households are most likely to be located in northern and eastern parts of the city, including downtown Naperville, although some areas south of 87th Street also had high percentages of cost-burdened owner households. Cost-burdened rental households are located throughout the city, though rental housing is more common in the northern portion of the city.

Are there any areas in the jurisdiction where racial or ethnic minorities or low-income families are concentrated? (include a definition of "concentration")

Naperville's ethnic and racial composition has changed significantly since 2000, with the minority population increasing from just below 15% in 2000 to 27.9% currently. The largest increase is in the Asian population which went from 9.6% in 2000 to 19.1%. During the same period, the Black or African American population remained at 5%. The City's last Analysis of Impediments to Fair Housing Choice (AI) assessed the conditions, both public and private, that affect fair housing choice in Naperville. As part of the research, a map of concentration areas for Whites, Asians, Blacks and Hispanics was developed. High concentrations of White residents are found in the central areas north of 75th Street in neighborhoods surrounding downtown and east of the 1-88/Route 59 interchange. Asian households were found throughout the City, but there are significant concentrations both to the north of Ogden Avenue and in the newer west/southwest areas of the City. There were concentrations of Black residents in the southern part of the City and of Hispanic residents in the northwest corner of Naperville. Researching Racially or Ethnically Concentrated Areas of Poverty (RE/CAPS), however, shows that no RE/CAPS exist in Naperville. The City defined its own areas of concentrations of lower income minority residents as census block groups with a minority population greater than the citywide median of 30.4% and a poverty rate greater than the citywide rate of 4.3%. We determined 16 census block groups, referred to

as "focus areas," that meet this criteria. The highest concentrations were found in the northwest part of the City and near the intersection of Route 59 and 95th Street.

What are the characteristics of the market in these areas/neighborhoods?

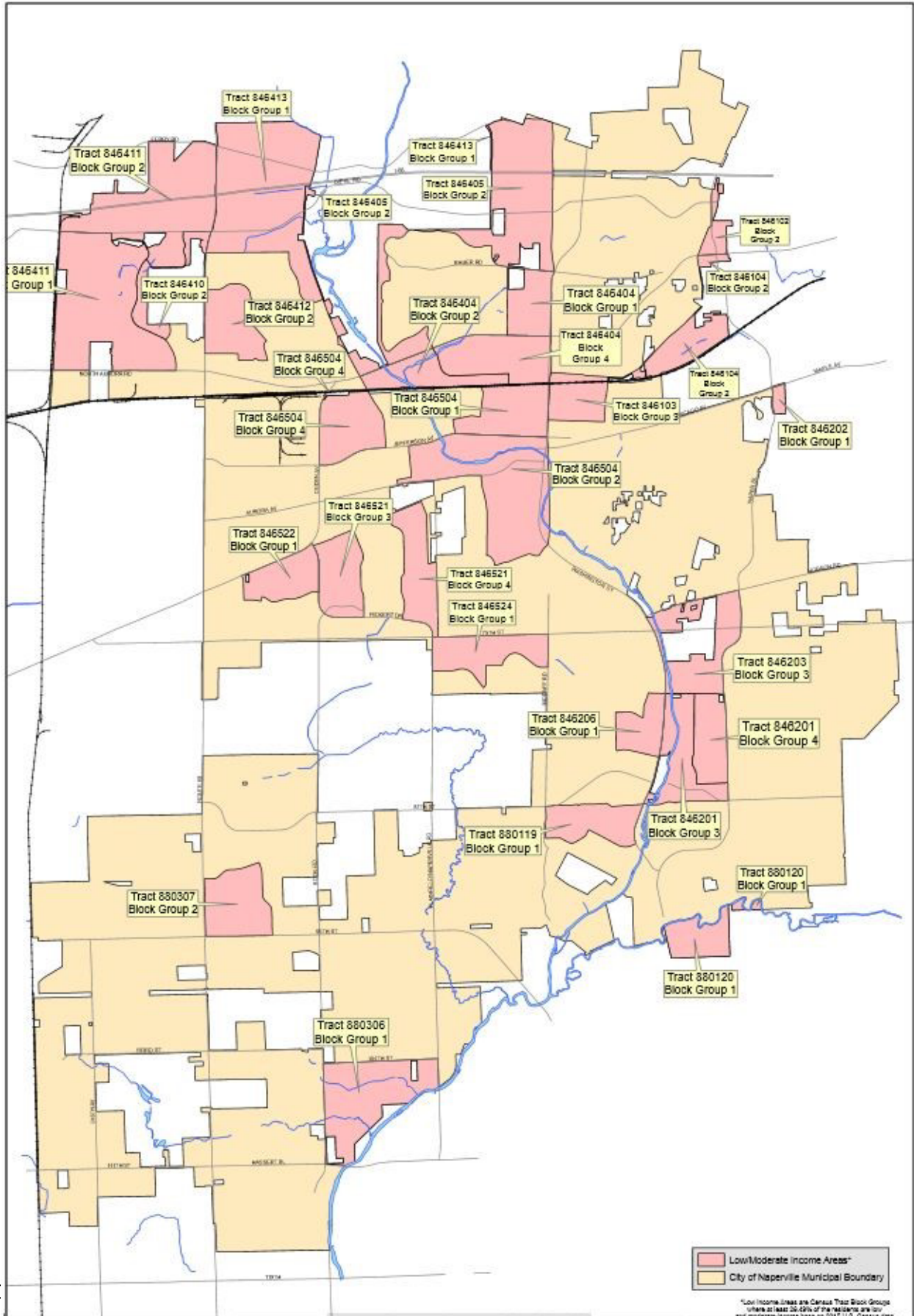
Both low and moderate income concentration areas and the Naperville focus areas tend to be located in the northern 2/3rds of the City, in close proximity to downtown Naperville, to the BNSF railroad tracks, to I-88/Route 59 highway interchanges and major thoroughfares. Some areas are also near large commercial/retail centers. One of these areas is located near the intersection of Route 59 and 95th Street. The housing stock in these neighborhoods is older, with higher percentages of multi-family and rental properties, including older apartment and townhome complexes that may feature smaller units with fewer amenities than some newer complexes. Single-family homes in these neighborhoods are also older, with smaller lots and small square footage.

Are there any community assets in these areas/neighborhoods?

Proximity to Metra stations, easy access to highways and downtown Naperville are considered assets. Low-income neighborhoods also have the same access to many of the amenities for which Naperville is known: highly-rated public schools, colleges and libraries, hospitals, parks and recreation areas, and shopping.

Are there other strategic opportunities in any of these areas?

As Naperville continues to become more built out, redevelopment pressure may increase in some low income areas. While this may threaten the affordability of some of these neighborhoods, it may also present an opportunity for creative use of incentives to preserve existing units and create new affordable housing. The City has discussed redevelopment of surface parking lots near the downtown Naperville AMTRAK/METRA station as a mixed-use area, including parking structures, retail/commercial and residential uses. Although no plan has been adopted, efforts to study this area for redevelopment have recently restarted. Other discussions have revolved around potential repurposing of parts of some traditional retail areas to include housing. The Naperville Affordable Housing Plan, accepted by IHDA in 2023, calls for an additional 1,263 affordable units to meet the 10% affordable housing minimum, identification of lands within Naperville appropriate for construction of affordable housing, and developing incentives that Naperville may provide for the purpose of attracting affordable housing. Much progress has already occurred, including zoning changes on private property to permit the redevelopment of an underutilized commercial motel for use as residential microunits and declaring 6.1 acres of city-owned land as surplus to be sold for use as affordable housing for seniors and people with intellectual disabilities.



Low/Moderate Income Areas*
 City of Naperville Municipal Boundary

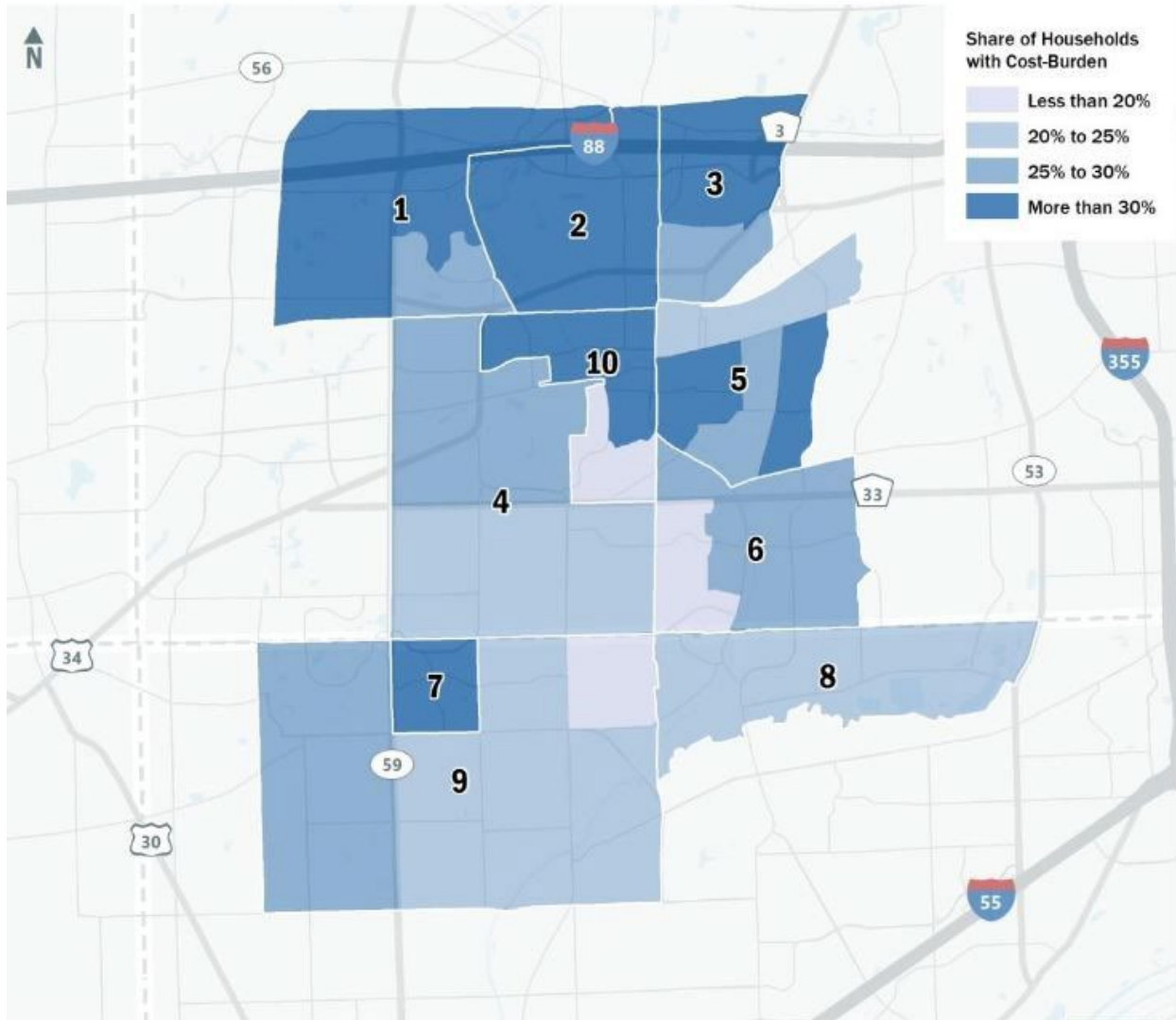
*Low Income Areas are Census Tract Block Groups where at least 20-49% of the residents are low and moderate-income based on 2010 U.S. Census data.

This map should be used for reference only. The data are subject to change without notice. City of Naperville assumes no liability in the use or application of the data. Reproduction or redistribution is forbidden without expressed written consent from the City of Naperville.



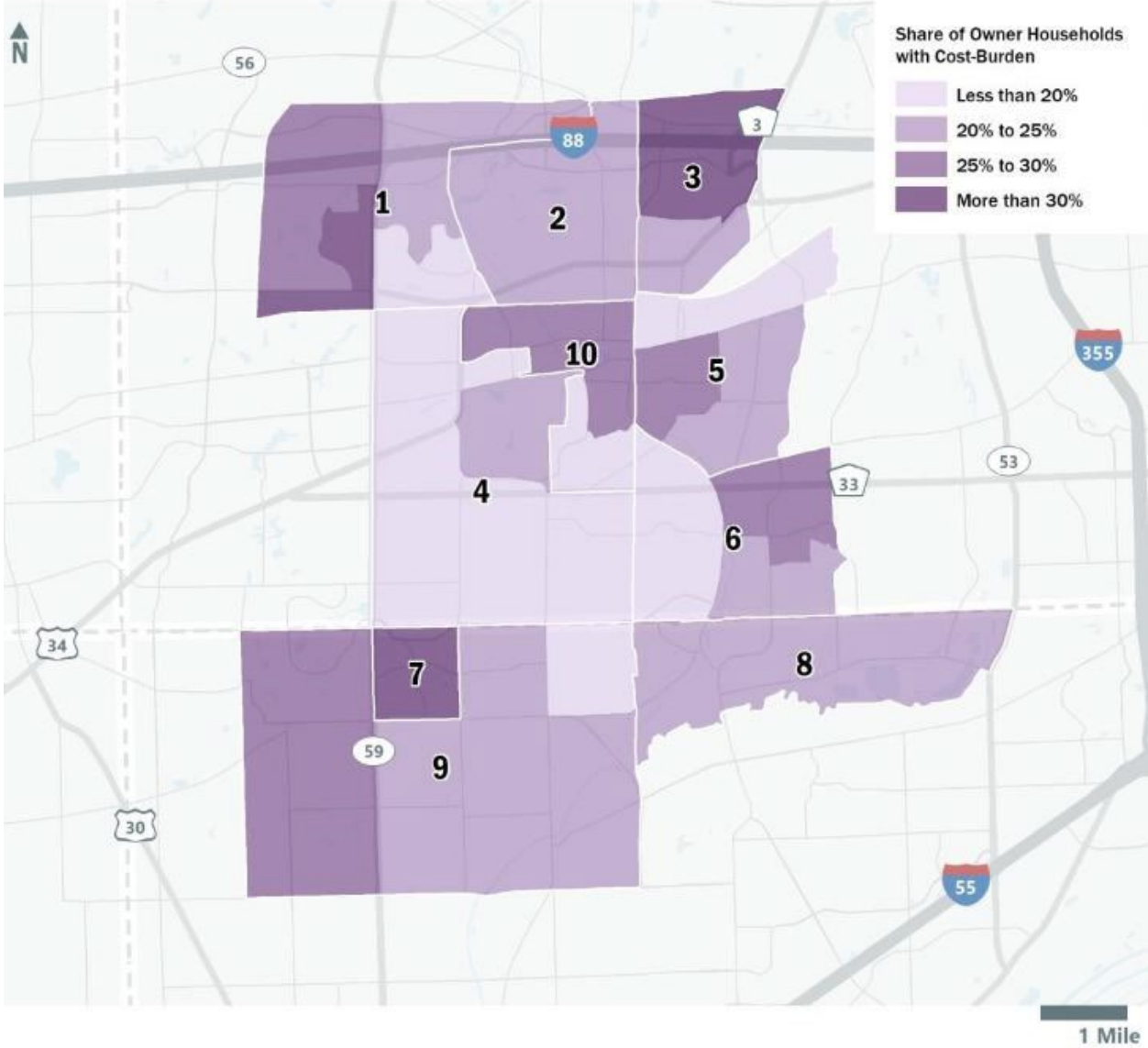
Low-Moderate Income Concentration Areas

COST-BURDENED HOUSEHOLDS OVERALL BY SUBAREA [1]



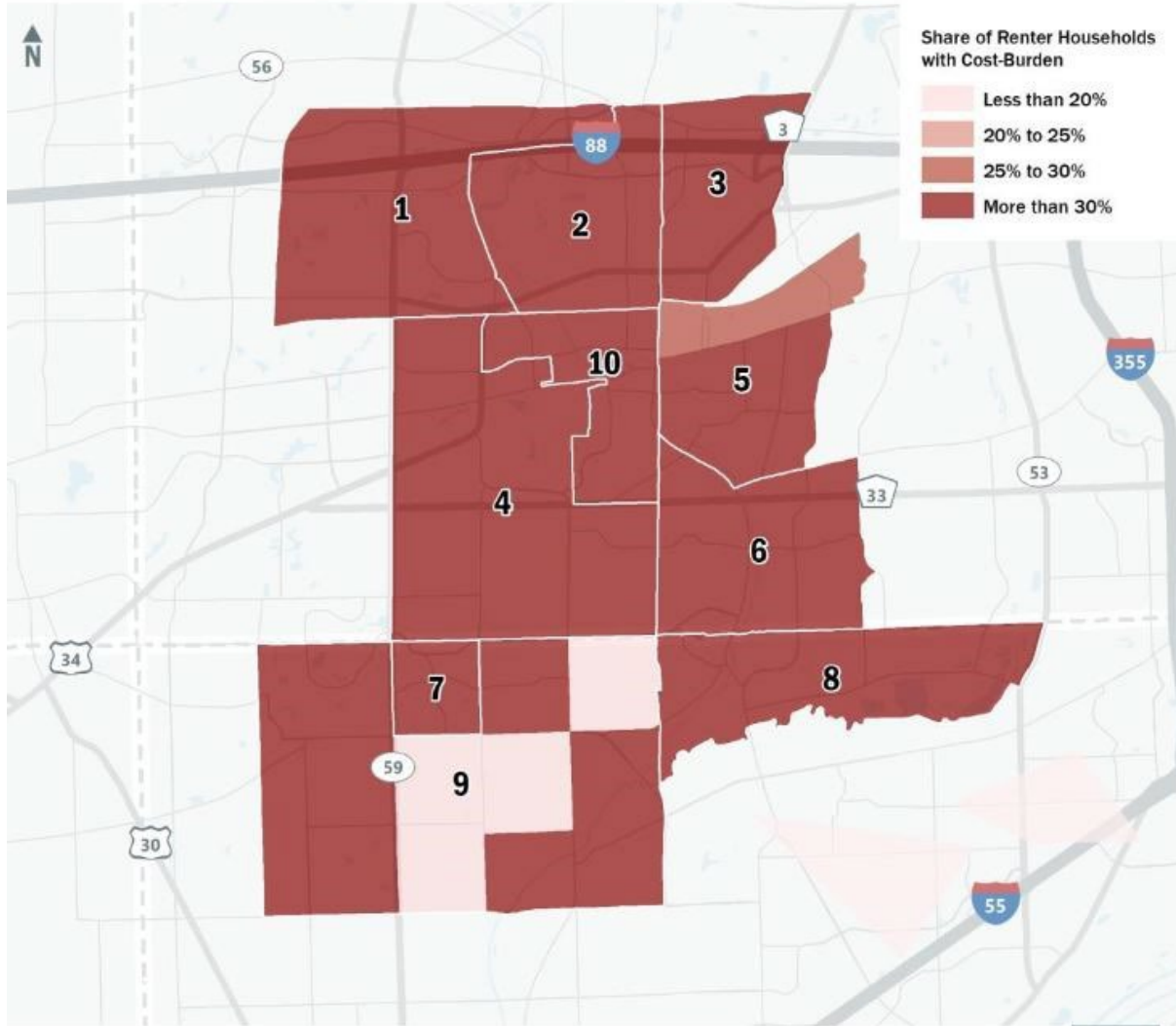
Cost-Burdened Households Overall by Subarea

COST-BURDENED OWNER HOUSEHOLDS BY SUBAREA [1]



Cost-Burdened Owner Households Overall by Subarea

COST-BURDENED RENTER HOUSEHOLDS BY SUBAREA [1]



Cost-Burdened Renter Households Overall by Subarea

MA-60 Broadband Needs of Housing occupied by Low- and Moderate-Income Households - 91.210(a)(4), 91.310(a)(2)

Describe the need for broadband wiring and connections for households, including low- and moderate-income households and neighborhoods.

AT&T provides internet service over fiber in Naperville; speeds may depend on geographical area, but there do not appear to be significant differences between low and moderate income concentration areas and other parts of the City. Broadband internet access is also available via Comcast Xfinity and Astound cable modems using coaxial cables. Given Naperville's strong business environment, it is likely that service providers will continue to invest in new infrastructure and technologies.

Describe the need for increased competition by having more than one broadband Internet service provider serve the jurisdiction.

Naperville has several broadband internet service providers (AT&T, Comcast Xfinity, Astound, Earthlink, T-Mobile Home Internet, etc.) over different technologies, including fiber, DSL, cable modem and satellite. Naperville's Information Technology Department has considered the possibility of providing municipal broadband, but determined that private providers are providing sufficient offerings.

MA-65 Hazard Mitigation - 91.210(a)(5), 91.310(a)(3)

Describe the jurisdiction's increased natural hazard risks associated with climate change.

Natural hazard risk to Naperville due to climate change generally fall into two categories: (1) temperature extremes, and (2) higher levels of precipitation, resulting in higher water levels in the DuPage River, which may result in a greater danger of flooding.

Describe the vulnerability to these risks of housing occupied by low- and moderate-income households based on an analysis of data, findings, and methods.

Although the DuPage River does run through several low and moderate income neighborhoods, it is generally sufficiently separated from residential areas by open space, detention areas and roads to avoid damage to homes. Naperville has had prohibitions against construction in floodplains and floodways since the late 1970's. In succeeding years, the City purchased any existing homes located in these areas and demolished them.

Although the City is not aware of any studies on this subject, extreme temperatures may pose a greater danger to low and moderate income households. These households may have older HVAC equipment or may be unable to afford professional maintenance, possibly resulting in a greater likelihood of equipment breaking down or functioning poorly during a severe weather incident. City programs subsidizing home repairs for low and moderate income households are one method of addressing these issues.

Strategic Plan

SP-05 Overview

Strategic Plan Overview

The Strategic Plan provides an overview of how the City of Naperville will spend CDBG funds over the next five program years (2025-2029). The following issue areas are included:

- Geographic Areas - Geographic areas where investment will be directed
- Priority Needs - Highest priority needs to be addressed in the areas of Housing, Homeless, Special Needs and Non-Housing Community Development
- Anticipated Resources - Anticipated federal and other funding resources available
- Institutional Delivery Structure - A description of the government and non-profit institutions that will carry out the projects and activities to meet priority needs
- Goals - Key goals to address priority needs
- Lead-Based Paint Hazards - Strategies to address lead-based paint hazards
- Anti-Poverty Strategy - Strategies to reduce poverty
- Monitoring - How subrecipients will be monitored to carry out projects and activities

SP-10 Geographic Priorities - 91.415, 91.215(a)(1)

Geographic Area

Table 12 - Geographic Priority Areas

1	Area Name:	City of Naperville
	Area Type:	Incorporated City of Naperville, IL
	Other Target Area Description:	Incorporated City of Naperville, IL
	HUD Approval Date:	
	% of Low/ Mod:	
	Revital Type:	
	Other Revital Description:	
	Identify the neighborhood boundaries for this target area.	The target area is the incorporated area of the City of Naperville.
	Include specific housing and commercial characteristics of this target area.	N/A
	How did your consultation and citizen participation process help you to identify this neighborhood as a target area?	N/A
	Identify the needs in this target area.	N/A
	What are the opportunities for improvement in this target area?	N/A
	Are there barriers to improvement in this target area?	N/A

General Allocation Priorities

Describe the basis for allocating investments geographically within the state

Although there are no plans at this time to direct investments to specific geographic areas during the 2025-2029 Consolidated Plan period, the City will closely monitor conditions in areas with concentrations of low and moderate income households and consult with city agencies and housing and social service organizations serving residents of these areas to determine how best to assist these households. If warranted, Naperville may chose to direct some funds to projects in these neighborhoods that qualify based on Low-Moderate Income Area Benefit or Housing Benefit, if suitable projects are presented that result in quantifiable improvements for low and moderate income residents. In

particular, the City will consider projects designed to improve public facilities and to preserve existing affordable housing and create new affordable units.

In the meantime, the City will consider funding any capital improvement or public service project located in the City of Naperville, or projects that provide significant benefits to Naperville residents. Projects selected for funding will be chosen for their ability to meet the national objectives of the CDBG program and the goals of the Consolidated Plan. All projects will benefit low and moderate income Naperville residents with emphasis on low and moderate income renters and homeowners, persons with special needs, including seniors, people with disabilities, people at-risk of homelessness and people who are homeless.

SP-25 Priority Needs - 91.415, 91.215(a)(2)

Priority Needs

Table 13 – Priority Needs Summary

1	Priority Need Name	Housing
	Priority Level	High
	Population	Extremely Low Low Moderate Large Families Families with Children Elderly Elderly Frail Elderly Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities Persons with Alcohol or Other Addictions Victims of Domestic Violence
	Geographic Areas Affected	Incorporated City of Naperville, IL
	Associated Goals	Affordable Rental Housing Affordable Owner-Occupied Housing Special Needs Housing and Supportive Services
	Description	<ul style="list-style-type: none"> • Affordable rental units - rehabilitation, new construction and acquisition • Affordable owner-occupied units - rehabilitation, acquisition, homebuyer assistance • Special needs supportive housing - rehabilitation, new construction and acquisition

	Basis for Relative Priority	Housing cost burden and lack of affordable housing are the most serious housing-related problem for Naperville households. Households making less than \$100,000 per year have limited options for homeownership and renter households making less than \$57,000 per year have few affordable options. Seniors with limited incomes face challenges with maintenance costs and adapting their homes to accommodate age-related physical disabilities. In addition approximately 10,293 Naperville residents are disabled, with 2.7% of the population having a cognitive disability and 2.8% with an ambulatory disability.
2	Priority Need Name	Non-Housing Community Development
	Priority Level	High
	Population	Extremely Low Low Moderate Large Families Families with Children Elderly Chronic Homelessness Individuals Families with Children Mentally Ill Chronic Substance Abuse veterans Persons with HIV/AIDS Victims of Domestic Violence Unaccompanied Youth Elderly Frail Elderly Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities Persons with Alcohol or Other Addictions Victims of Domestic Violence Non-housing Community Development
	Geographic Areas Affected	Incorporated City of Naperville, IL

	Associated Goals	Non-Housing Community Development: Accessibility Non-Housing Comm Development: Public Facilities Non-Housing Community Development: Public Services
	Description	Non-Housing Community Development: Public Facilities <ul style="list-style-type: none"> • Removal of architectural barriers/ADA compliance improvements • Senior centers • Handicapped centers • Homeless facilities (housing and facilities with supportive services) • Neighborhood facilities • Parks and recreation facilities • Other facilities servicing low and moderate income households Non-Housing Community Development: Public Services <ul style="list-style-type: none"> • Basic needs/Life skills (Emergency Assistance, Financial Literacy, Food, Parenting, Employment, etc.) • Substance Abuse • Mental Health • High Need Groups - Elderly, Frail Elderly, Disabled Persons, Youth, Homeless, Domestic Violence • Transportation
	Basis for Relative Priority	Non-housing Community Development needs encompass a broad set of activities, including public infrastructure, public facilities and public services. While the last ConPlan had public infrastructure goals, they were not met and the emphasis for this plan is on the areas that overachieved their goals which are public facilities and public services. Public facility needs including ADA compliance and facilities for special populations. These needs were identified by non-profit providers in the area and frequent subrecipients of Naperville's CDBG funding over the next five years. In addition, public services are in high demand in Naperville and, to the extent that we can fund these services with CDBG funds, they remain a high priority.
3	Priority Need Name	Extremely Low-Income, At-Risk, Homeless Households
	Priority Level	High

Population	<p>Extremely Low Low Large Families Families with Children Elderly Chronic Homelessness Individuals Families with Children Mentally Ill Chronic Substance Abuse veterans Persons with HIV/AIDS Victims of Domestic Violence Unaccompanied Youth</p>
Geographic Areas Affected	<p>Incorporated City of Naperville, IL</p>
Associated Goals	<p>Homeless Housing and Supportive Services Non-Housing Community Development: Homeless Non-Housing Community Development: Public Services</p>
Description	<p>Implementation of anti-poverty strategy and addressing all points on the continuum of care:</p> <ul style="list-style-type: none"> • Homelessness prevention - emergency rent, mortgage and utility assistance • Emergency shelter - rehabilitation, new construction, acquisition • Rapid rehousing and transitional housing - rehabilitation, new construction, acquisition • Permanent supportive housing for chronically homeless - rehabilitation, new construction, acquisition
Basis for Relative Priority	<p>Although poverty-level households make up only about 4.3% of the City's population, it is estimated that 8,161 Naperville residents have incomes below the poverty level. At-risk and homeless households represent the most vulnerable populations and are most likely to have poverty-level incomes.</p>

Narrative (Optional)

SP-35 Anticipated Resources - 91.420(b), 91.215(a)(4), 91.220(c)(1,2)

Introduction

As a metropolitan city with more than 50,000 residents, Naperville qualifies as an entitlement community for the federal CDBG Program. Entitlement communities receive annual grants from HUD to carry out a wide range of community development activities directed towards revitalizing neighborhoods, increasing economic development, and improving community facilities and services. Grantees must give maximum priority to activities that benefit low and moderate income persons, aid in the prevention or elimination of slums or blight, and meet urgent community development needs that pose a serious risk to the health or welfare of the community. Grantees have broad flexibility to develop their own programs, activities and funding priorities so long as they meet one of these national objectives. The Naperville City Council establishes the allocations for use of the CDBG funds based on the priorities set forth in the five-year Consolidated Plan.

Allocations for each CDBG entitlement grantee are determined annually by HUD following adoption of the federal budget by Congress. For each year of the 2025-2029 Consolidated Plan an estimate of \$535,000 plus any prior year unspent funds is used for each year's annual action plan, until the actual allocation amount from HUD is confirmed. The City develops and releases a draft Annual Action Plan for public comment using the estimate and includes contingency provisions so that the City can adopt the plan prior to receiving the final allocation amount, since the timing on that varies considerably from year to year.

The 2025 Annual Action Plan estimates an allocation of \$535,000 and each subsequent year of the plan will be similar, therefore, we estimate our entitlement grant total being \$2,675,000 in years 2025-2029. Actual allocations are expected to vary based on several factors, including the amount of funds appropriated by Congress, the total number of entitlement communities, and changes in the components of the formula used by HUD to determine allocation amounts. Therefore, allocations will vary from year to year and it is anticipated that each year's available funds will include some reallocated funds from projects that did not use their full funding allocation.

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: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	535,000	0	0	535,000	2,140,000	Annual CDBG allocation

Table 14 - Anticipated Resources

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

To receive CDBG funds from the City of Naperville, local non-profit organizations must submit a detailed application demonstrating that the project will meet a national objective of the CDBG program, meet the criteria for eligible activities and meet at least one priority of the DuPage County Consortium Consolidated Plan. Although there are no specific matching requirements for CDBG-funding projects, project evaluation criteria also includes the extent to which CDBG funds are leveraged against other funds.

CDBG subrecipients make use of a wide variety of state, local, corporate, foundation and other private funding sources in addition to CDBG and other federal funds. State and locally-administered funding programs include the Emergency Food and Shelter Program, Community-Based Residential Program, Community Integrated Living Arrangements Program, Community Care Program, Home Care Services Program and Domestic Violence Program. Other important and frequently used funding sources include foundation grants, United Way grants and corporate and individual donations.

The City of Naperville's Social Service Grant Program and Opioid Remediation Grant Program are two important local funding sources leveraging CDBG resources. An annual allocation from proceeds of the City's Food & Beverage Tax is used for funding the grants, which provide direct assistance to social service organizations that assist Naperville residents. Grants may be used for program costs, salaries, supplies, and materials. The call for projects takes place at the same time as the call for CDBG projects and the application and evaluation criteria are similar. This allows us flexibility in funding applications that meet CDBG requirements with CDBG funding and funding other applications with Social Service Grant or Opioid Remediation Grant funds. Recipients can receive funding for different projects from the different funding sources.

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

No publicly owned land or property located in incorporated Naperville is currently designated to address the needs identified in the plan.

Discussion

HUD Notice CPD 19-01, issued February 13, 2019, "Guidance on Submitting Consolidated Plans and Annual Action Plans for Fiscal Year 2019" instructs grantees not to submit their Consolidated Plan and/or Annual Action Plan until after HUD announces the Program Year formula allocation amounts. Since the amount of Naperville's Program Year 2025 grant allocation was unknown when the Annual Action Plan was being developed, the City employed an estimated amount of \$535,000. The draft plan included the following contingency provisions if the final allocation amount was higher or lower than the estimated amount. Naperville's submitted plan will reflect the actual allocation amount.

1) Final grant allocation exceeds \$535,000: If the final grant allocation exceeds \$535,000, the City will undertake the following changes in proposed activities:

- Add additional funding for CDBG-eligible public service activities subject to the public services cap
- Proportionally increase funding for projects that received less than full funding
- Add funding for fair housing activities subject to the planning and administration cap

2) Final grant allocation is less than \$535,000: If the final grant allocation is less than \$535,000, the City will undertake the following change in proposed activities:

- The proposed funding amounts for all activities will be proportionally decreased to match the actual allocation amount.

3) Pre-Award Cost Waiver: In addition to the guidance on submitting Consolidated Plans and Annual Action Plans, NOTICE CPD-19-01 included a waiver of 24 CFR 470.200(h), the section that specifies the situations under which a grantee may incur costs prior to the effective date of its grant agreement. Sections V.8.2 and V.8.3 of the Notice state that the effective date of the grantee's FY2019 grant agreement will be considered to be the earlier of either the grantee's program year start date or the date that the Consolidated Plan/Annual Action Plan (with actual allocation amounts) is received by HUD. If the City of Naperville decides to use the waiver, the City will document in writing the conditions giving rise to the need to use the waiver, and maintain the documentation for HUD's review. The City of Naperville will include any activity for which the costs are being incurred in its AAP prior to the costs being incurred.

SP-40 Institutional Delivery Structure - 91.415, 91.215(k)

Explain the institutional structure through which the jurisdiction will carry out its consolidated plan including private industry, non-profit organizations, and public institutions.

Responsible Entity	Responsible Entity Type	Role	Geographic Area Served
Loaves and Fishes	Non-profit organizations	Homelessness Non-homeless special needs public services	Region
DUPAGE PADS	Non-profit organizations	Homelessness Non-homeless special needs Ownership public services	Region
DUPAGE COUNTY	Government	Non-homeless special needs Planning	Other
WILL COUNTY	Government	Non-homeless special needs Planning	Other
Rebuilding Together Aurora	Non-profit organizations	Ownership	Jurisdiction
BRIDGE COMMUNITIES	Non-profit organizations	Homelessness	Region
Naperville Elderly Homes	Non-profit organizations	Rental	Jurisdiction
YMCA OF METROPOLITAN CHICAGO	Non-profit organizations	Non-homeless special needs public facilities public services	Jurisdiction
LITTLE FRIENDS	Non-profit organizations	Non-homeless special needs public facilities public services	Jurisdiction
RAY GRAHAM ASSOCIATION FOR PEOPLE WITH DISABILITIES	Non-profit organizations	Non-homeless special needs public facilities public services	Jurisdiction

Responsible Entity	Responsible Entity Type	Role	Geographic Area Served
Turning Pointe Autism Foundation	Non-profit organizations	Non-homeless special needs public facilities public services	Jurisdiction
UCP SEGUIN OF GREATER CHICAGO	Non-profit organizations	Non-homeless special needs public facilities public services	Jurisdiction
Northern Illinois Food Bank	Non-profit organizations	Non-homeless special needs public facilities public services	Region
DuPage Housing Authority	PHA	Rental	Region
ILLINOIS INDEPENDENT LIVING CENTER, KATHARINE MANOR APARTMENTS	Non-profit organizations	Non-homeless special needs Ownership Rental public facilities public services	Region
DUPAGE HABITAT FOR HUMANITY	Non-profit organizations	Ownership	Region
DUPAGE HOMEOWNERSHIP CENTER	Non-profit organizations	Ownership	Region
Community Housing Advocacy Development	Non-profit organizations	Rental	Region
SENIOR HOME SHARING	Non-profit organizations	Rental	Jurisdiction
Family Shelter Service of Metropolitan Family Services DuPage	Non-profit organizations	Homelessness	Region
360 Youth Services	Non-profit organizations	Homelessness Non-homeless special needs public facilities public services	Jurisdiction

Responsible Entity	Responsible Entity Type	Role	Geographic Area Served
Kids Above All (formerly ChildServ)	Non-profit organizations	Homelessness Non-homeless special needs public facilities public services	Jurisdiction

Table 15 - Institutional Delivery Structure

Assess of Strengths and Gaps in the Institutional Delivery System

Naperville residents have access to an exceptional number of community-based non-profit agencies working in partnership with each other and with the City of Naperville, DuPage and Will Counties to improve their quality of life. All of the agencies listed, whether headquartered in Naperville or in DuPage or Will County, deliver high-quality direct services to the City's low and moderate income residents, senior citizens and people with special needs.

Although municipal, county and non-profit agencies provide a wide spectrum of services, lack of funding makes it difficult for them to adequately serve all potential clients. In particular, non-profit organizations which provide crucial services to residents frequently operate on very low budgets and must compete for funding with other organizations. Non-profits typically have small staffs, potentially making it difficult to serve the number of clients that are in need of services. Staff turnover and lack of capacity and experience in particular areas may also complicate an organization's ability to serve clients. The City of Naperville, through its CDBG, Social Service Grant and Opioid Remediation Grant programs, provides crucial funding to these organizations, monitors their performance and works to improve efficiency by reducing duplication of services.

In addition, residents sometimes are not aware of the availability of services offered at different levels of government and by different non-profit agencies. Lack of awareness may result in residents missing opportunities to participate in programs they are eligible for. Many agencies work closely together and refer clients to each other, but the existence of many different organizations located in different towns can make coordination more difficult. A positive trend over the years has been for organizations with similar or complementary missions and programs to merge, resulting in lower administrative expenses, better coordination of services and less duplication. Meanwhile, the City of Naperville will continue to explore ways to improve collaboration, improve marketing of programs and provide technical and financial assistance to non-profits.

Availability of services targeted to homeless persons and persons with HIV and mainstream services

Homelessness Prevention Services	Available in the Community	Targeted to Homeless	Targeted to People with HIV
Homelessness Prevention Services			
Counseling/Advocacy	X	X	X

Homelessness Prevention Services	Available in the Community	Targeted to Homeless	Targeted to People with HIV
Homelessness Prevention Services			
Legal Assistance	X	X	
Mortgage Assistance	X	X	
Rental Assistance	X	X	
Utilities Assistance	X	X	
Street Outreach Services			
Law Enforcement	X	X	
Mobile Clinics			
Other Street Outreach Services	X	X	
Supportive Services			
Alcohol & Drug Abuse	X	X	X
Child Care	X	X	
Education	X	X	
Employment and Employment Training	X	X	
Healthcare	X	X	
HIV/AIDS	X	X	X
Life Skills	X	X	X
Mental Health Counseling	X	X	
Transportation	X	X	X
Other			
Benefits advocacy	X	X	

Table 16 - Homeless Prevention Services Summary

Describe how the service delivery system including, but not limited to, the services listed above meet the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth)

Chronically homeless individuals and families/homeless families with children: In addition to the services listed, the DuPage Continuum of Care works towards the elimination of homelessness throughout DuPage County. The CoC provides information and referrals for emergency housing assistance through health care providers, including mental health providers, hospitals, clinics and substance abuse treatment centers. The County coordinates with emergency shelters, domestic violence shelters and transitional housing programs to provide homelessness prevention, rapid rehousing, emergency shelter and transitional housing. Emergency shelters coordinate services with the Health Department, medical providers and educational institutions to identify and develop comprehensive services for those who are chronically homeless or at-risk or who may have special needs.

These organizations are among the most active in providing crucial services to Naperville households experiencing or at-risk of homelessness:

- Loaves and Fishes Community Services
- DuPage Pads
- Bridge Communities
- Family Shelter Service/Metropolitan Family Services

Veterans and their families: Loaves and Fishes has a referral and advocacy program for veterans and their families that works to connect clients with programs provided by the Veteran's Assistance Commission of DuPage County. Although not targeted specifically towards veterans, all the other agencies discussed above provide services to veterans and their families. Other organizations available in DuPage County include Midwest Shelter for Homeless Veterans, Hines Veterans Hospital, the Illinois Department of Veterans Affairs and Prairie State Legal Services.

Unaccompanied Youth: Naperville provides funding to 360 Youth Services and Kids Above All through its Social Services Grant program. They provide shelter, transitional housing and housing for homeless young adults, youth and including those in foster care and those who have aged out of foster care.

Describe the strengths and gaps of the service delivery system for special needs population and persons experiencing homelessness, including, but not limited to, the services listed above

Despite the excellent work done by the organizations discussed above and in the region and the close collaboration between organizations, there is still a gap between the number of beds needed for permanent supportive housing and the number available. DuPage County has also documented an ongoing need for services for people with chronic mental illness. Edward Hospital has documented a need for continuing mental health care and drug abuse prevention services.

Provide a summary of the strategy for overcoming gaps in the institutional structure and service delivery system for carrying out a strategy to address priority needs

Naperville will continue to participate in the DuPage County HOME Consortium and will actively seek opportunities to utilize HOME funds to provide affordable housing in Naperville.

Locally, Naperville will continue to place a high priority on funding projects that assist homeless and at-risk people, particularly homelessness prevention assistance, housing assistance, affordable housing and programs that provide necessary services such as food assistance, employment assistance, access to benefits, mental health and substance abuse counseling.

The City will continue to work to increase coordination between government agencies and non-profit housing and social service providers to determine where gaps exist and to reduce duplication of services. Other areas for improvement include outreach to increase public knowledge of available programs at both the City and County level, including improvements to information available on the City's website. Some programs that are not available in Naperville are available in DuPage County. The

City will work to ensure that its residents are aware of these programs and have the ability to access their physical locations.

SP-45 Goals - 91.415, 91.215(a)(4)

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Affordable Rental Housing	2025	2029	Affordable Housing	City of Naperville	Housing	CDBG: \$500,000	Rental units rehabilitated: 400 Household Housing Unit
2	Affordable Owner-Occupied Housing	2025	2029	Affordable Housing	City of Naperville	Housing	CDBG: \$400,000	Homeowner Housing Rehabilitated: 25 Household Housing Unit
3	Special Needs Housing and Supportive Services	2025	2029	Non-Homeless Special Needs	City of Naperville	Housing	CDBG: \$450,000	Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit: 60 Households Assisted
4	Homeless Housing and Supportive Services	2025	2029	Homeless	City of Naperville	Extremely Low-Income, At-Risk, Homeless Households	CDBG: \$400,000	Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit: 75 Households Assisted
5	Non-Housing Community Development: Accessibility	2025	2029	Non-Housing Community Development	City of Naperville	Non-Housing Community Development	CDBG: \$100,000	Public service activities other than Low/Moderate Income Housing Benefit: 300 Persons Assisted
6	Non-Housing Comm Development: Public Facilities	2025	2029	Non-Housing Community Development	City of Naperville	Non-Housing Community Development	CDBG: \$150,000	Public service activities other than Low/Moderate Income Housing Benefit: 4000 Persons Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
7	Non-Housing Community Development: Homeless	2025	2029	Non-Housing Community Development	City of Naperville	Extremely Low-Income, At-Risk, Homeless Households	CDBG: \$75,000	Public service activities other than Low/Moderate Income Housing Benefit: 500 Persons Assisted
8	Non-Housing Community Development: Public Services	2025	2029	Non-Homeless Special Needs	City of Naperville	Non-Housing Community Development Extremely Low-Income, At-Risk, Homeless Households	CDBG: \$325,000	Public service activities other than Low/Moderate Income Housing Benefit: 150 Persons Assisted
9	Administration & Planning	2025	2029	Planning & Administration	City of Naperville		CDBG: \$275,000	Other: 1 Other

Table 17 – Goals Summary

Goal Descriptions

1	Goal Name	Affordable Rental Housing
	Goal Description	To preserve and increase the quality and availability of affordable rental housing through rehabilitation, acquisition and construction.
2	Goal Name	Affordable Owner-Occupied Housing
	Goal Description	To preserve and increase the quality and affordability of owner-occupied housing through rehabilitation and other assistance

3	Goal Name	Special Needs Housing and Supportive Services
	Goal Description	To support essential services, facility improvements and facility development to enable people with special needs to access suitable living environments
4	Goal Name	Homeless Housing and Supportive Services
	Goal Description	To support essential services, facility improvements and facility development to enable homeless and at-risk people to access suitable living environments
5	Goal Name	Non-Housing Community Development: Accessibility
	Goal Description	To enhance the accessibility of public facilities by eliminating architectural barriers and ensuring ADA compliance
6	Goal Name	Non-Housing Comm Development: Public Facilities
	Goal Description	To maintain a viable and sustainable urban community through needed public facility improvements
7	Goal Name	Non-Housing Community Development: Homeless
	Goal Description	To reduce the incidence of poverty and homelessness by providing public services to prevent homelessness and assist homeless and at-risk people to become self-sufficient
8	Goal Name	Non-Housing Community Development: Public Services
	Goal Description	To assist low-income households, reduce the incidence of poverty and avoid job losses by providing public services to individuals to enhance life skills and self-sufficiency
9	Goal Name	Administration & Planning
	Goal Description	Administration of the CDBG Program and planning for community development needs. May include housing, fair housing, community/neighborhood, land use/zoning and other types of plans, as well as expenses to conduct training and implement Analysis of Impediments to Fair Housing Choice or Equity Plans as applicable, and housing/community development plans as adopted

Estimate the number of extremely low-income, low-income, and moderate-income families to whom the jurisdiction will provide affordable housing as defined by HOME 91.315(b)(2)

It is estimated that at least 560 people will receive assistance in accessing affordable housing during the 2025-2029 period covered by the Consolidated Plan. Approximately 200 of these individuals are estimated to be extremely low-income and the remaining 360 will include and low and moderate income individuals.

SP-65 Lead-based Paint Hazards - 91.415, 91.215(i)

Actions to address LBP hazards and increase access to housing without LBP hazards

Applicable lead-based paint regulations will be followed for all rehabilitation projects in which the building was constructed before 1978, including required testing. If lead-based paint is found to be present, contractors certified in safe work practices will be used for abatement. If children under the age of six are residing in the building they will be referred to the County Health Department for testing for lead-based paint exposure. Clearance tests will be performed by an EPA certified risk assessor and a certified laboratory upon project completion. All CDBG-funded projects will also take the potential presence of asbestos into consideration.

How are the actions listed above integrated into housing policies and procedures?

City of Naperville CDBG Standard Operating Procedures and Naperville building code include these policies and procedures.

SP-70 Anti-Poverty Strategy - 91.415, 91.215(j)

Jurisdiction Goals, Programs and Policies for reducing the number of Poverty-Level Families

According to the most recent U.S. census data, only about 4.3% of Naperville residents have incomes below the poverty level. However, this percentage equates to more than 6,000 people. In addition, certain population groups have a significantly higher poverty rate including female-headed households with children under 18, minorities and people with disabilities. To assist poverty-level families, Naperville will implement the following strategies for 2025-2029:

Goals and Policies:

Social Services to Promote Self-Sufficiency: Work with social service providers, other governmental and local agencies to identify the needs of those threatened with poverty and homelessness and to find resources to meet those needs. Identify and fund social services most successful in promoting self-sufficiency. Continue to use the City's Social Service Grant Program to fund crucial emergency services, self-sufficiency programs and programs to assist people with special needs and homeless and at-risk households.

Homelessness Prevention: Provide funding for programs that provide temporary assistance for rent and utility payments and services to help at-risk households resolve crisis situations.

Provide Rapid Rehousing Options: Work with social service providers, other governmental and local agencies to encourage the provision of emergency housing and transitional housing units.

Provide Affordable Permanent Housing Options: Develop programs to preserve existing affordable housing and develop new affordable options focusing on high-risk groups, including low-income households, single-parents, minorities and people with disabilities.

Programs:

Homelessness Prevention/Supportive Services: Continue to use CDBG public service funds to support homelessness prevention programs and services

Additional Public Services/Public Facilities: Provide additional public service and public facilities funding for new programs and facilities to enhance self-sufficiency programs specifically targeted towards poverty-level households and at-risk groups, such as financial counseling, benefits advocacy, employment assistance, food assistance, transportation assistance, substance abuse counseling, mental health counseling and neighborhood centers.

Affordable Housing:

- 1) Fund acquisition and rehabilitation of housing for persons with special needs, including domestic violence shelters, transitional housing, and Community Integrated Living Arrangements (CILA's) or group homes for adults with disabilities.
- 2) Identify and fund programs that add to the existing inventory of affordable rental and owner-occupied housing, while preserving housing that is already part of the inventory. Special emphasis should be placed on senior housing, housing for people with disabilities, and low-income families.

How are the Jurisdiction poverty reducing goals, programs, and policies coordinated with this affordable housing plan

Concurrently with the development of the PY 2025-2029 Consolidated Plan, the City of Naperville undertook three other planning initiatives that directly impact the goals, programs and policies addressed in the Consolidated Plan.

- **Housing Action Plan:** Naperville worked with the HOMES Technical Assistance Team (Chicago Metropolitan Agency for Planning (CMAP), Metropolitan Mayor's Caucus and Metropolitan Planning Council) to develop a Housing Action Plan to identify key housing issues and present policy and program options.
- **Housing Needs Assessment/Affordable Housing Plan:** As part of the implementation of the Action Items recommended by the *Analysis of Impediments to Fair Housing Choice (AI)*, received by the City in 2017, a consulting firm, S. B. Friedman Associates, Inc. was engaged to develop a Housing Needs Assessment and Affordable Housing Plan.
- **Comprehensive Master Plan Update:** During the same period, the City engaged a consultant, Houseal Lavigne Associates, to update the City's Comprehensive Master Plan, including the housing element.

All three of these plans have been formally received by the City and are being implemented. They involved extensive data analysis, focus groups and stakeholder interviews to identify key housing issues. Key findings have been incorporated into the **Market Analysis** and **Strategic Plan**.

Focus groups and stakeholder interviews included service providers whose clientele are most likely to be experiencing poverty and providers of emergency, transitional, low-income housing, low-income senior housing, and housing for people with disabilities. Boards, Commissions and Task Forces representing seniors and people with disabilities were also consulted, as well as social service agencies providing direct assistance to very low-income and homeless individuals and households.

The action plans include zoning, legal, regulatory, policy and programmatic recommendations. Although some of the recommendations are not directly applicable to the CDBG program, they may enable

policies that will supplement CDBG funding and permit the adoption of new CDBG-funded programs, including acquisition, rehabilitation and infrastructure improvements for affordable housing.

SP-80 Monitoring - 91.230

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

To ensure compliance with its Consolidated Plan and improve the quality of projects and outcomes, the City of Naperville will implement the following monitoring strategies and procedures. The monitoring plan is divided into four phases:

- Pre-Award
- Contract
- Project Implementation
- Close-Out

Pre-Award: The pre-award phase covers the pre-application funding process. Each proposed use of funding is compared to the regulations and the City's current Consolidated Plan to determine its eligibility before funds are awarded. Prospective applicants can also arrange for technical assistance to discuss funding and application, e.g. discuss eligibility of the specific project, application requirements, etc.

Evaluation criteria stress organizational capacity, experience with federal funding and leveraged funds. The City will also identify risk factors, such as lack of CDBG or similar program experience, lack of adequate and knowledgeable staff, staff or leadership changes, poor performance on past projects and non-compliance with program regulations.

Subrecipient Agreements: Following approval of a funding application, the City and the Subrecipient will write and sign a subrecipient agreement.

Subrecipients will review the agreement with the Community Grants Coordinator and receive technical assistance on the steps necessary to complete the project and comply with HUD regulations. If necessary, the Community Grants Coordinator will review and discuss risk factors and how the subrecipient can mitigate them. An implementation schedule will be developed for the project.

Project Implementation: Project Implementation covers the period following contract signing through the project activity up to final payout. The goal of monitoring during and following project Implementation is to ensure that the project is completed on time in compliance with CDBG regulations and requirements.

Monitoring may be done through both desk audits and on-site monitoring. Desk audits will consist of reviewing submitted reports, payouts, and other case-file documents as appropriate for the project.

Reports will be reviewed for accuracy and completeness to ensure adequate progress and identify potential problem areas that may require additional monitoring.

On-site monitoring will be conducted based on risk factors identified. Monitoring visits may also be conducted periodically to determine if there are findings, violations of the regulations, concerns, potential for violations or other problems, or no findings and concerns. The Community Grants Coordinator will use a monitoring checklist to assess the subrecipient's compliance with regulations. For rehabilitation projects site visits may occur, as needed, at completion of the project or while the project is in process.

Project Closeout/Post-Closeout Review: The final phase of subrecipient monitoring covers the period from the request for the final draw of project funds through the final reporting to HUD on project completion. This phase will be carried out through a desk audit for most projects. Rehabilitation projects that require permits will require a final on-site inspection in accordance with City regulations and other inspections may be required, as deemed necessary. The following steps apply for every situation:

1. Final report received and reviewed
2. Documentation of National Objective and demographic and other information on beneficiaries received and reviewed
3. Final reconciliation of project accounting
4. Final assessment of success of project in terms of meeting outcome measurement in a timely manner

Expected Resources

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

Introduction

As a metropolitan city with more than 50,000 residents, Naperville qualifies as an entitlement community for the federal CDBG Program. Entitlement communities receive annual grants from HUD to carry out a wide range of community development activities directed towards revitalizing neighborhoods, increasing economic development, and improving community facilities and services. Grantees must give maximum priority to activities that benefit low and moderate income persons, aid in the prevention or elimination of slums or blight, and meet urgent community development needs that pose a serious risk to the health or welfare of the community. Grantees have broad flexibility to develop their own programs, activities and funding priorities so long as they meet one of these national objectives. The Naperville City Council establishes the allocations for use of the CDBG funds based on the priorities set forth in the five-year Consolidated Plan.

Allocations for each CDBG entitlement grantee are determined annually by HUD following adoption of the federal budget by Congress. For each year of the 2025-2029 Consolidated Plan an estimate of \$535,000 plus any prior year unspent funds is used for each year's annual action plan, until the actual allocation amount from HUD is confirmed. The City develops and releases a draft Annual Action Plan for public comment using the estimate and includes contingency provisions so that the City can adopt the plan prior to receiving the final allocation amount, since the timing on that varies considerably from year to year.

The 2025 Annual Action Plan estimates an allocation of \$535,000 and each subsequent year of the plan will be similar, therefore, we estimate our entitlement grant total being \$2,675,000 in years 2025-2029. Actual allocations are expected to vary based on several factors, including the amount of funds appropriated by Congress, the total number of entitlement communities, and changes in the components of the formula used by HUD to determine allocation amounts. Therefore, allocations will vary from year to year and it is anticipated that each year's available funds

will include some reallocated funds from projects that did not use their full funding allocation.

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: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	535,000.00	0.00	0.00	535,000.00	2,140,000.00	Annual CDBG allocation

Table 18 - Expected Resources – Priority Table

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

To receive CDBG funds from the City of Naperville, local non-profit organizations must submit a detailed application demonstrating that the project will meet a national objective of the CDBG program, meet the criteria for eligible activities and meet at least one priority of the DuPage County Consortium Consolidated Plan. Although there are no specific matching requirements for CDBG-funding projects, project evaluation criteria also includes the extent to which CDBG funds are leveraged against other funds.

CDBG subrecipients make use of a wide variety of state, local, corporate, foundation and other private funding sources in addition to CDBG and other federal funds. State and locally-administered funding programs include the Emergency Food and Shelter Program, Community-Based Residential Program, Community Integrated Living Arrangements Program, Community Care Program, Home Care Services Program and Domestic Violence Program. Other important and frequently used funding sources include foundation grants, United Way grants and corporate

and individual donations.

The City of Naperville's Social Service Grant Program and Opioid Remediation Grant Program are two important local funding sources leveraging CDBG resources. An annual allocation from proceeds of the City's Food & Beverage Tax is used for funding the grants, which provide direct assistance to social service organizations that assist Naperville residents. Grants may be used for program costs, salaries, supplies, and materials. The call for projects takes place at the same time as the call for CDBG projects and the application and evaluation criteria are similar. This allows us flexibility in funding applications that meet CDBG requirements with CDBG funding and funding other applications with Social Service Grant or Opioid Remediation Grant funds. Recipients can receive funding for different projects from the different funding sources.

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

No publicly owned land or property located in incorporated Naperville is currently designated to address the needs identified in the plan.

Discussion

HUD Notice CPD 19-01, issued February 13, 2019, "Guidance on Submitting Consolidated Plans and Annual Action Plans for Fiscal Year 2019" instructs grantees not to submit their Consolidated Plan and/or Annual Action Plan until after HUD announces the Program Year formula allocation amounts. Since the amount of Naperville's Program Year 2025 grant allocation was unknown when the Annual Action Plan was being developed, the City employed an estimated amount of \$535,000. The draft plan included the following contingency provisions if the final allocation amount was higher or lower than the estimated amount. Naperville's submitted plan will reflect the actual allocation amount.

1) Final grant allocation exceeds \$535,000: If the final grant allocation exceeds \$535,000, the City will undertake the following changes in proposed activities:

- Add additional funding for CDBG-eligible public service activities subject to the public services cap
- Proportionally increase funding for projects that received less than full funding
- Add funding for fair housing activities subject to the planning and administration cap

2) Final grant allocation is less than \$535,000: If the final grant allocation is less than \$535,000, the City will undertake the following change in proposed activities:

- The proposed funding amounts for all activities will be proportionally decreased to match the actual allocation amount.

3) Pre-Award Cost Waiver: In addition to the guidance on submitting Consolidated Plans and Annual Action Plans, NOTICE CPD-19-01 included a waiver of 24 CFR 470.200(h), the section that specifies the situations under which a grantee may incur costs prior to the effective date of its grant agreement. Sections V.8.2 and V.8.3 of the Notice state that the effective date of the grantee's FY2019 grant agreement will be considered to be the earlier of either the grantee's program year start date or the date that the Consolidated Plan/Annual Action Plan (with actual allocation amounts) is received by HUD. If the City of Naperville decides to use the waiver, the City will document in writing the conditions giving rise to the need to use the waiver, and maintain the documentation for HUD's review. The City of Naperville will include any activity for which the costs are being incurred in its AAP prior to the costs being incurred.

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	Affordable Rental Housing	2025	2029	Affordable Housing	City of Naperville	Housing	CDBG: \$100,000.00	Rental units rehabilitated: 190 Household Housing Unit
2	Affordable Owner-Occupied Housing	2025	2029	Affordable Housing	City of Naperville	Housing	CDBG: \$.00	Homeowner Housing Rehabilitated: 5 Household Housing Unit
3	Homeless Housing and Supportive Services	2025	2029	Homeless	City of Naperville	Extremely Low-Income, At-Risk, Homeless Households	CDBG: \$82,500.00	Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit: 6 Households Assisted
4	Special Needs Housing and Supportive Services	2025	2029	Non-Homeless Special Needs	City of Naperville	Housing	CDBG: \$56,000.00	Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit: 12 Households Assisted
5	Non-Housing Community Development: Accessibility	2025	2029	Non-Housing Community Development	City of Naperville	Non-Housing Community Development	CDBG: \$121,250.00	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 288 Persons Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
6	Non-Housing Community Development: Homeless	2025	2029	Non-Housing Community Development	City of Naperville	Non-Housing Community Development	CDBG: \$60,000.00	Public service activities other than Low/Moderate Income Housing Benefit: 45 Persons Assisted
7	Non-Housing Community Development: Public Services	2025	2029	Non-Homeless Special Needs	City of Naperville	Non-Housing Community Development	CDBG: \$20,250.00	Public service activities other than Low/Moderate Income Housing Benefit: 33 Persons Assisted
8	Non-Housing Comm Development: Public Facilities	2025	2029	Non-Housing Community Development	City of Naperville	Non-Housing Community Development	CDBG: \$40,000.00	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 10000 Persons Assisted
9	Administration & Planning	2025	2029	Planning & Administration			CDBG: \$55,000.00	Other: 1 Other

Table 19 – Goals Summary

Goal Descriptions

1	Goal Name	Affordable Rental Housing
	Goal Description	To preserve and increase the quality and availability of affordable rental housing through rehabilitation, acquisition and construction
2	Goal Name	Affordable Owner-Occupied Housing
	Goal Description	To preserve and increase the quality and affordability of owner-occupied housing through rehabilitation and other assistance

3	Goal Name	Homeless Housing and Supportive Services
	Goal Description	To support essential services, facility improvements and facility development to enable homeless and at-risk people to access suitable living environments
4	Goal Name	Special Needs Housing and Supportive Services
	Goal Description	To support essential services, facility improvements and facility development to enable people with special needs to access suitable living environments
5	Goal Name	Non-Housing Community Development: Accessibility
	Goal Description	To enhance the accessibility of public facilities by eliminating architectural barriers and ensuring ADA compliance
6	Goal Name	Non-Housing Community Development: Homeless
	Goal Description	To reduce the incidence of poverty and homelessness by providing public services to prevent homelessness and assist homeless and at-risk people become self-sufficient
7	Goal Name	Non-Housing Community Development: Public Services
	Goal Description	To assist low-income households, reduce the incidence of poverty and avoid job losses by providing public services to individuals to enhance life skills and self-sufficiency
8	Goal Name	Non-Housing Comm Development: Public Facilities
	Goal Description	To maintain a viable and sustainable urban community through needed public facility improvements
9	Goal Name	Administration & Planning
	Goal Description	Administration of the CDBG program and planning for community development needs. May include housing, fair housing, community/neighborhood, land use/zoning and other types of plans, as well as expenses to conduct training and implement Analysis of Impediments to Fair Housing Choice or Equity Plans as applicable, and housing/community development plans as adopted

AP-35 Projects - 91.420, 91.220(d)

Introduction

The following projects will be undertaken:

- 1) Bridge Communities – Rehabilitation of Apartment Units
- 2) DuPage PADS-Olympus Place Permanent Supportive Housing
- 3) DuPage PADS-Scattered Site Permanent Supportive Housing
- 4) Little Friends - Roof Renovation for Naperville CILA (1127 Thackery Lane)
- 5) Little Friends-Roof Renovation for Naperville CILA (4804 Fesseneva Lane)
- 6) Loaves & Fishes Community Services-Emergency Assistance Program
- 7) Naperville Elderly Homes-Energy Efficiency and Reliable Heat and Hot Water System Replacement
- 8) Northern Illinois Food Bank-Parking Lot Asphalt Milling and Resurfacing
- 9) Rebuilding Together Aurora-Safe at Home Single Family Home Rehabilitation
- 10) Turning Pointe Autism Foundation - Addition of Canopy to Side Building Entrance
- 11) UCP Seguin - Privacy/Safety Fence Project
- 12) YMCA of Metropolitan Chicago - Fry Family YMCA Accessible Playground Enhancements
- 13) YMCA of Metropolitan Chicago - Fry Family YMCA Bathroom Renovations to Improve ADA Accessibility
- 14) City of Naperville – Grant Administration

#	Project Name
1	Bridge Communities - Rehabilitation of Apartment Units
2	DuPage PADS - Olympus Place Permanent Supportive Housing
3	DuPage PADS - Scattered Site Permanent Supportive Housing
4	Little Friends - Roof Renovation for Naperville CILA (1127 Thackery Lane)
5	Little Friends - Roof Renovation for Naperville CILA (4804 Fesseneva Lane)
6	Loaves & Fishes Community Services -Emergency Assistance Program

#	Project Name
7	Naperville Elderly Homes - Energy Efficiency and Reliable Heat and Hot Water System Replacement
8	Northern Illinois Food Bank -Parking Lot Asphalt Milling and Resurfacing
9	Rebuilding Together Aurora -Safe at Home Single Family Home Rehabilitation
10	Turning Pointe Autism Foundation - Addition of Canopy to Side Building Entrance
11	UCP Seguin - Privacy/Safety Fence Project
12	YMCA of Metro Chicago - Fry Family YMCA Accessible Playground Enhancements
13	YMCA of Metro Chicago - Fry Family YMCA Bathroom Renovations to Improve ADA Accessibility
14	City of Naperville - Grant Administration

Table 20 – Project Information

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

The City of Naperville's 2025-2029 Consolidated Plan guides investment of CDBG funds for PY 2025. The plan includes priorities, goals and objectives based on data analysis, and collaboration and consultation with key stakeholders representing Naperville's low and moderate income residents. The City's strategic plan and affordable housing work plan also guide investment in CDBG projects. Through implementation of the PY25 AAP, the City seeks to preserve its existing affordable housing stock and impact low and moderate income Naperville residents. All proposed projects were reviewed and approved by a Reviewer Team comprised of volunteer Naperville residents from the City of Naperville's Senior Task Force, Accessible Community Task Force and Human Rights & Fair Housing Commission, as well as the City's Sustainability Manager and Director of Community Services. The projects reflect City's overall priorities and goals and meet the national objectives of the CDBG program.

AP-38 Project Summary

Project Summary Information

1	Project Name	Bridge Communities - Rehabilitation of Apartment Units
	Target Area	
	Goals Supported	Homeless Housing and Supportive Services
	Needs Addressed	Housing Extremely Low-Income, At-Risk, Homeless Households
	Funding	CDBG: \$82,500.00
	Description	Bridge Communities, Inc. - \$82,500 will be used to completely rehabilitate 2 units in a 6 unit transitional housing building located at 1324 Crab Apple Court, Naperville, IL by replacing cabinetry and countertops in the kitchens, replacing the flooring throughout each unit and closet doors, replacing tile and fixtures in the bathrooms, replacing lighting, and repainting each unit. These improvements will maintain these units as quality, affordable transitional housing for homeless and at-risk families.
	Target Date	3/31/2026
	Estimate the number and type of families that will benefit from the proposed activities	6 homeless households
	Location Description	1324 Crab Apple Court, Naperville, IL

	Planned Activities	<i>Bridge Communities, Inc.</i> – \$82,500 will be used to completely rehabilitate 2 units in a 6 unit transitional housing building located at 1324 Crab Apple Court, Naperville, IL by replacing cabinetry and countertops in the kitchens, replacing the flooring throughout each unit and closet doors, replacing tile and fixtures in the bathrooms, replacing lighting, and repainting each unit. These improvements will maintain these units as quality, affordable transitional housing for homeless and at-risk families.
2	Project Name	DuPage PADS - Olympus Place Permanent Supportive Housing
	Target Area	
	Goals Supported	Non-Housing Community Development: Public Services
	Needs Addressed	Extremely Low-Income, At-Risk, Homeless Households
	Funding	CDBG: \$15,000.00
	Description	DuPage PADS Olympus Place Housing Program - \$15,000 will be used for on-site services to approximately 10-20 formerly chronically homeless persons now living in permanent supportive housing at 5 Olympus Place Drive, Naperville, IL.
	Target Date	3/31/2026
	Estimate the number and type of families that will benefit from the proposed activities	11 formerly chronically homeless individuals
	Location Description	5 Olympus Place Drive, Naperville, IL
	Planned Activities	DuPage <i>PADS Olympus Place Housing Program</i> - \$15,000 will be used for on-site services to approximately 10-20 formerly chronically homeless persons now living in permanent supportive housing at 5 Olympus Place Drive, Naperville, IL.
3	Project Name	DuPage PADS - Scattered Site Permanent Supportive Housing
	Target Area	
	Goals Supported	Non-Housing Community Development: Public Services

	Needs Addressed	Extremely Low-Income, At-Risk, Homeless Households
	Funding	CDBG: \$5,250.00
	Description	DuPage PADS Scattered Site Permanent Supportive Housing - \$5,250 will be used for on-site services to approximately 22 formerly chronically homeless persons now living in permanent supportive housing across the City of Naperville.
	Target Date	3/31/2026
	Estimate the number and type of families that will benefit from the proposed activities	22 formerly chronically homeless individuals
	Location Description	Locations vary, but all are in the City of Naperville
	Planned Activities	DuPage <i>PADS Scattered Site Permanent Supportive Housing</i> - \$5,250 will be used for on-site services to approximately 22 formerly chronically homeless persons now living in permanent supportive housing across the City of Naperville.
4	Project Name	Little Friends - Roof Renovation for Naperville CILA (1127 Thackery Lane)
	Target Area	City of Naperville
	Goals Supported	Special Needs Housing and Supportive Services
	Needs Addressed	Housing
	Funding	CDBG: \$15,000.00
	Description	\$15,000 will be used to rehabilitate a Community Integrated Living Arrangement (CILA) duplex housing 4 adults with disabilities. The home, located at 1127 Thackery Lane, Naperville, IL, will be rehabilitated by replacing the roof. The home will be retained as affordable, accessible housing for adults with disabilities.
	Target Date	3/31/2026

	Estimate the number and type of families that will benefit from the proposed activities	4 adults with disabilities
	Location Description	1127 Thackery Lane, Naperville, IL
	Planned Activities	<i>Little Friends, Inc.</i> – \$15,000 will be used to rehabilitate a Community Integrated Living Arrangement (CILA) duplex housing 4 adults with disabilities. The home, located at 1127 Thackery Lane, Naperville, IL, will be rehabilitated by replacing the roof. The home will be retained as affordable, accessible housing for adults with disabilities.
5	Project Name	Little Friends - Roof Renovation for Naperville CILA (4804 Fesseneva Lane)
	Target Area	
	Goals Supported	Special Needs Housing and Supportive Services
	Needs Addressed	Housing
	Funding	CDBG: \$13,000.00
	Description	Little Friends, Inc. - \$13,000 will be used to rehabilitate a Community Integrated Living Arrangement (CILA) duplex housing 4 adults with disabilities. The home, located at 4804 Fesseneva Lane, Naperville, IL, will be rehabilitated by replacing the roof. The home will be retained as affordable, accessible housing for adults with disabilities.
	Target Date	3/31/2026
	Estimate the number and type of families that will benefit from the proposed activities	4 adults with disabilities
	Location Description	4804 Fesseneva Lane, Naperville, IL

	Planned Activities	Little Friends, Inc. – \$13,000 will be used to rehabilitate a Community Integrated Living Arrangement (CILA) duplex housing 4 adults with disabilities. The home, located at 4804 Fesseneva Lane, Naperville, IL, will be rehabilitated by replacing the roof. The home will be retained as affordable, accessible housing for adults with disabilities.
6	Project Name	Loaves & Fishes Community Services -Emergency Assistance Program
	Target Area	
	Goals Supported	Non-Housing Community Development: Homeless
	Needs Addressed	Extremely Low-Income, At-Risk, Homeless Households
	Funding	CDBG: \$60,000.00
	Description	Loaves & Fishes CARES Program - \$60,000 will be used for homelessness prevention through temporary rent and utility assistance, and counseling services benefiting approximately 45 households.
	Target Date	3/31/2026
	Estimate the number and type of families that will benefit from the proposed activities	45 individuals at risk of homelessness
	Location Description	1871 High Grove Lane, Naperville, IL
	Planned Activities	<i>Loaves & Fishes CARES Program</i> - \$60,000 will be used for homelessness prevention through temporary rent and utility assistance, and counseling services benefiting approximately 45 households.
7	Project Name	Naperville Elderly Homes - Energy Efficiency and Reliable Heat and Hot Water System Replacement
	Target Area	
	Goals Supported	Affordable Rental Housing
	Needs Addressed	
	Funding	CDBG: \$100,000.00

	Description	Naperville Elderly Homes, Inc. (Martin Avenue Apartments) - \$100,000 will be used to replace the domestic water system in the original section of Martin Avenue Apartments (310 West Martin Avenue, Naperville, IL), a 190-unit apartment complex providing affordable rental housing for low and moderate-income seniors.
	Target Date	3/31/2026
	Estimate the number and type of families that will benefit from the proposed activities	190 senior citizens
	Location Description	310 West Martin Avenue, Naperville, IL
	Planned Activities	<i>Naperville Elderly Homes, Inc. (Martin Avenue Apartments)</i> – \$100,000 will be used to replace the domestic water system in the original section of Martin Avenue Apartments (310 West Martin Avenue, Naperville, IL), a 190-unit apartment complex providing affordable rental housing for low and moderate-income seniors.
8	Project Name	Northern Illinois Food Bank -Parking Lot Asphalt Milling and Resurfacing
	Target Area	
	Goals Supported	Non-Housing Comm Development: Public Facilities
	Needs Addressed	Non-Housing Community Development
	Funding	CDBG: \$10,000.00
	Description	Northern Illinois Food Bank - \$10,000 will be used to resurface the parking lot of their west suburban food distribution center.
	Target Date	3/31/2026
	Estimate the number and type of families that will benefit from the proposed activities	9940 low and moderate income individuals
	Location Description	273 Dearborn Ct. Geneva, IL

	Planned Activities	<i>Northern Illinois Food Bank</i> - \$10,000 will be used to resurface the parking lot of their west suburban food distribution center.
9	Project Name	Rebuilding Together Aurora -Safe at Home Single Family Home Rehabilitation
	Target Area	City of Naperville
	Goals Supported	Affordable Owner-Occupied Housing
	Needs Addressed	Housing
	Funding	:
	Description	Rebuilding Together Aurora -Single Family Home Rehabilitation Program <i>Ã</i> Ã <i>Â</i> Ã <i>Â</i> Previously allocated funding will be used to rehabilitate at least 5 owner-occupied single family homes within the municipal boundaries of the City of Naperville. CDBG-funded eligible homes will be occupied by low and moderate income residents who are elderly or disabled and requiring home modifications and/or repairs they are unable to perform on their own due to financial or physical constraints.
	Target Date	3/31/2026
	Estimate the number and type of families that will benefit from the proposed activities	5 low and moderate income senior citizens
	Location Description	Various, but all within the City of Naperville
Planned Activities	<i>Rebuilding Together Aurora -Single Family Home Rehabilitation Program</i> – Previously allocated funding will be used to rehabilitate at least 5 owner-occupied single family homes within the municipal boundaries of the City of Naperville. CDBG-funded eligible homes will be occupied by low and moderate income residents who are elderly or disabled and requiring home modifications and/or repairs they are unable to perform on their own due to financial or physical constraints.	
10	Project Name	Turning Pointe Autism Foundation - Addition of Canopy to Side Building Entrance
	Target Area	City of Naperville
	Goals Supported	Non-Housing Comm Development: Public Facilities

	Needs Addressed	Non-Housing Community Development
	Funding	CDBG: \$30,000.00
	Description	Turning Pointe Autism Foundation - Addition of Canopy to Side Building Entrance - \$30,000 will be used construct and install a canopy over the new student access door that was relocated due to the new bus drop-off and pick up location.
	Target Date	3/31/2026
	Estimate the number and type of families that will benefit from the proposed activities	60 individuals with disabilities
	Location Description	1500 West Ogden Avenue, Naperville, IL
	Planned Activities	<i>Turning Pointe Autism Foundation – Addition of Canopy to Side Building Entrance - \$30,000 will be used construct and install a canopy over the new student access door that was relocated due to the new bus drop-off and pick up location.</i>
11	Project Name	UCP Seguin - Privacy/Safety Fence Project
	Target Area	City of Naperville
	Goals Supported	Special Needs Housing and Supportive Services
	Needs Addressed	
	Funding	CDBG: \$28,000.00
	Description	UCP Seguin -Privacy/Safety Fence Project - \$28,000 remove and replace inadequate backyard fencing and install a new durable PVC vinyl perimeter privacy/safety fence with two locking gates at the CILA located at 715 Sara Lane, housing 4 adults with disabilities.
	Target Date	3/31/2026

	Estimate the number and type of families that will benefit from the proposed activities	4 adults with disabilities
	Location Description	715 Sara Lane, Naperville, IL
	Planned Activities	<i>UCP Sequin – Privacy/Safety Fence Project</i> - \$28,000 remove and replace inadequate backyard fencing and install a new durable PVC vinyl perimeter privacy/safety fence with two locking gates at the CILA located at 715 Sara Lane, housing 4 adults with disabilities.
12	Project Name	YMCA of Metro Chicago - Fry Family YMCA Accessible Playground Enhancements
	Target Area	City of Naperville
	Goals Supported	Non-Housing Community Development: Accessibility
	Needs Addressed	Non-Housing Community Development
	Funding	CDBG: \$40,000.00
	Description	YMCA of Metropolitan Chicago - \$40,000 will be used to complete Phase II of a project to improve the playground at the Fry Family YMCA, located at 2120 95th Street. Improvements will increase ADA access through installation of a ramp and new accessible play structures and resurface the area for enhanced accessibility.
	Target Date	3/31/2026
	Estimate the number and type of families that will benefit from the proposed activities	288 individuals
	Location Description	2120 95th Street, Naperville, IL
	Planned Activities	<i>YMCA of Metropolitan Chicago</i> - \$40,000 will be used to complete Phase II of a project to improve the playground at the Fry Family YMCA, located at 2120 95th Street. Improvements will increase ADA access through installation of a ramp and new accessible play structures and resurface the area for enhanced accessibility.

13	Project Name	YMCA of Metro Chicago - Fry Family YMCA Bathroom Renovations to Improve ADA Accessibility
	Target Area	
	Goals Supported	Non-Housing Community Development: Accessibility
	Needs Addressed	Non-Housing Community Development
	Funding	CDBG: \$81,250.00
	Description	YMCA of Metropolitan Chicago - \$81,250 will be used to complete renovations to the front entrance bathrooms at the Fry Family YMCA, located at 2120 95th Street. Improvements will increase ADA access and increase durability of fixtures.
	Target Date	3/31/2026
	Estimate the number and type of families that will benefit from the proposed activities	288 individuals
	Location Description	2120 95th Street, Naperville, IL
	Planned Activities	YMCA of Metropolitan Chicago - \$81,250 will be used to complete renovations to the front entrance bathrooms at the Fry Family YMCA, located at 2120 95th Street. Improvements will increase ADA access and increase durability of fixtures.
14	Project Name	City of Naperville - Grant Administration
	Target Area	
	Goals Supported	Administration & Planning
	Needs Addressed	
	Funding	CDBG: \$55,000.00
	Description	\$55,000 will be used to fund administration activities for the Program Year 2025 CDBG Program
	Target Date	3/31/2026

	Estimate the number and type of families that will benefit from the proposed activities	N/A
	Location Description	400 S. Eagle Street, Naperville, IL
	Planned Activities	\$55,000 will be used to fund administration activities for the Program Year 2025 CDBG Program

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

Thirteen (13) of the 14 projects are physically located in the City of Naperville and 1 project is located in the neighboring suburb of Geneva and directly impacts low and moderate income Naperville residents with food assistance needs. Projects will primarily or exclusively benefit low and moderate income individuals with emphasis on families with children, special needs and senior populations and individuals who are homeless or at risk of becoming homeless.

Geographic Distribution

Target Area	Percentage of Funds
City of Naperville	100

Table 21 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

The City of Naperville generally has not directed assistance to specific geographic areas within Naperville. The types of projects assisted are located throughout the City.

Discussion

N/A

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

Introduction

Naperville will undertake additional actions to address the following areas of concern:

1. Meeting Underserved Needs
2. Fostering and maintaining affordable housing
3. Reducing Lead-Based Paint Hazards
4. Reducing the Number of Poverty-Level Families
5. Developing Institutional Structure
6. Enhancing Coordination Between Public and Private Housing and Social Service Agencies

Actions planned to address obstacles to meeting underserved needs

The City will use the priorities established in the Consolidated Plan for Program Years 2025-2029 to guide the allocation of CDBG funds. The City will continue to utilize public meetings, workshops, surveys and consultations with service providers, as well as analyzing new data, as it becomes available, to improve its understanding of community needs. During future program years, the City may consider requesting proposals for both CDBG and Social Service Grants that are specifically targeted towards underserved needs or population groups.

City staff will also continue to participate in the DuPage County HOME Advisory Commission to learn about available services and advise the Commission about Naperville's specific needs. Knowledge obtained from studies and consultation with local service providers is being used to determine which community needs are not currently being addressed adequately by existing programs, prevent duplication of services and improve coordination between service providers.

An additional obstacle to meeting underserved needs is the unavailability and uncertainty of adequate funding for projects. The actual amount of the CDBG allocation fluctuates from year to year and is influenced by factors beyond the City's control. Funding amounts are generally not adequate to meet the City's needs, especially in the areas of public services and affordable renter and owner-occupied housing. In future years, the City may consider researching and applying for additional sources of community development funding.

Actions planned to foster and maintain affordable housing

For 2025, the City will prioritize actions designed to prevent homelessness and support renters and owners negatively impacted by job loss and income disruption. These actions will include continued funding for rent and mortgage assistance, specialized housing and services for homeless persons and persons at risk of homelessness, acquisition and rehabilitation of existing housing for affordable rentals,

and providing additional supportive services, such as food, mental health and employment assistance.

Actions planned to reduce lead-based paint hazards

An assessment of the need for lead-based paint remediation will be undertaken for all CDBG-funded housing projects. The City will communicate with subrecipients and monitor all projects to ensure that lead-based paint regulations are implemented correctly in rehabilitation projects. Applicable lead-based paint regulations will be followed for all rehabilitation projects in which the building was constructed prior to 1978. If necessary, contractors certified in safe work practices will be used for rehab work. The City has an arrangement with DuPage County to assist the City in lead-based paint abatement.

Most of the potential lead-based paint hazards in Naperville are restricted to the older area of the City where most of the housing stock pre-dates 1978. Specifically, this area is bounded by Ogden Avenue on the north, Columbia Street on the east, Hillside Road on the south and the DuPage River on the west. U.S. Census data indicates that there could be as many as 2,700 households that may be at risk of exposure to lead based paint hazards. The City will pay special attention to monitoring rehabilitation projects located in these areas.

Actions planned to reduce the number of poverty-level families

Community Development Block Grant (CDBG) Program: The following CDBG awards to impact poverty-level families are proposed for PY 2025 funds:

- **Transitional Housing for Homeless Families and Youth:** \$82,500 to Bridge Communities to rehabilitate transitional housing for homeless families
- **Permanent Housing for Low-Income Seniors:** \$100,000 to Naperville Elderly Homes to replace the hot water system at their complex providing affordable rental housing for low income seniors.
- **Housing for People with Special Needs:** \$56,000 in total to 2 non-profit housing providers, Little Friends, Inc. and UCP-Seguin, for rehabilitation work on their CILA facilities providing housing and services to individuals with severe physical and mental disabilities
- **Public Services for At-Risk, Homeless and Formerly Homeless Households:** \$60,000 to Loaves & Fishes CARES Program to provide emergency rent and utility assistance to families at risk of homelessness due to severe financial difficulties, \$20,250 to DuPage PADS to provide support services to chronically homeless persons with disabilities.

Social Services Grant (SSG) Program: The Social Services Grant (SSG) Program is another crucial component of the City's strategy to reduce the number of poverty-level families. For the Calendar Year 2025, a total of \$750,000 has been allocated to organizations and programs that provide assistance to low-income families. These programs include emergency rent and utility assistance, services to single parents, emergency housing, food assistance, employment counseling, substance abuse counseling,

mental health counseling, youth services and after-school programs.

Actions planned to develop institutional structure

Staff will work with other City departments, local service providers, and agencies from DuPage County and Will County to implement the Consolidated Plan goals and strategies for 2020-2024.

In addition to the formal structure inherent in administering CDBG funds, the City will pursue informal communication and coordination with public and private housing agencies, other governmental agencies, private businesses, non-profit community agencies and other organizations working to meet the housing assistance and support needs of low and moderate-income people in the community.

The City will work with local agencies to coordinate services to eliminate gaps, reduce duplication of programs, and emphasize efficient service delivery for local, state, and federal programs.

The City will continue to participate in the DuPage County HOME Advisory Commission and will increase participation in the Continuum of Care (CoC) and other organizations, such as Impact DuPage to learn and provide input on how implementation of homelessness and affordable housing programs can be improved county-wide.

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

The City will continue to work to strengthen relationships with DuPage County and with county-wide nonprofit social service agencies and housing providers, including the DuPage Housing Authority. Staff will work with these organizations to enhance coordination between public and private agencies and between non-profit agencies providing different services to the same clientele. Many non-profit agencies have already developed these partnerships and the City will consult with them to determine how we can help to enhance these efforts.

Discussion

N/A

Program Specific Requirements

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

Introduction

This section reports on Naperville's expected Program Income for Program Year 2024, the amount of funds that will be used for urgent needs, and the percentage of CDBG funds that will be used to benefit low- and moderate-income residents.

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:	0

Other CDBG Requirements

1. The amount of urgent need activities	0
2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan.	92.52%

Discussion

The City of Naperville does not anticipate receiving program income from any of the sources listed above during Program Year 2024 and the City does not anticipate classifying any activities as Urgent Need. This means that 92.52% of PY2025 CDBG funds will be used to benefit low and moderate-income residents.

Appendix - Alternate/Local Data Sources

Sort order	Type	Data Source Name	List the name of the organization or individual who originated the data set.	Provide a brief summary of the data set.	What was the purpose for developing this data set?	Provide the year (and optionally month, or month and day) for when the data was collected.	Briefly describe the methodology for the data collection.	Describe the total population from which the sample was taken.	Describe the demographics of the respondents or characteristics of the unit of measure, and the number of respondents or units surveyed.	How comprehensive is the coverage of this administrative data? Is data concentrated in one geographic area or among a certain population?	What time period (provide the year, and optionally month and day) is covered by this data set?	What is the status of the data set (complete, in progress, or planned)?
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