

CITY OF NAPERVILLE
George Pradel, Mayor

DRAFT
2015 ANNUAL
ACTION PLAN



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Executive Summary

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

1. Introduction

The draft Annual Action Plan (AAP) describes the activities to be undertaken with the City's Community Development Block Grant (CDBG) funds during Program Year 2015 (April 1, 2015 – March 31, 2016). Program Year 2015 is also the first year of the five-year Consolidated Plan for 2015-2019. The AAP provides an analysis of challenges to improving and providing affordable and attainable housing, as well as strategies and recommendations for improving the City's response to a variety of priority needs.

2. Summarize the objectives and outcomes identified in the Plan

Naperville is a member of the DuPage County HOME Consortium, for which DuPage County is the lead entity. Therefore, Naperville is considered part of the 2015-2019 DuPage County Consolidated Plan. The Five-Year Consolidated Plan analyzes and establishes goals for the following key areas:

- Affordable housing
- Homeless needs
- Affirmative housing and market analysis
- Non-housing community development needs
- Lead based paint hazard reduction
- Anti-poverty strategies
- Coordination

For the purposes of this One-Year Action Plan, the City of Naperville will report on affordable housing, homeless, and non-homeless special needs housing objectives according to the DuPage County Five-Year Consolidated Plan. The City of Naperville has also adopted strategies to meet its needs for non-housing community development and anti-poverty objectives.

CDBG activities supporting consolidated plan objectives and outcomes are found in the following activity description tables. A minimum of 70% of activities will assist low to moderate-income people.

Total amount of funds available in 2015:

Projected CDBG 2015 Entitlement	\$400,000*	(projected amount)
Reprogrammed Funds	\$128,065	
Program Income	\$ 0	
Roll-over Funds	<u>\$ 88,000</u>	(projected amount)
Total	\$616,065	

***Contingency Provisions**

*At this time, final CDBG allocations have not been released by U.S. Department of Housing and Urban Development (HUD). Therefore, the projected \$400,000 CDBG allocation is an estimate. When the final allocation is known, funding amounts for proposed activities/projects will be adjusted to accurately reflect the actual allocation. In the meantime, the City of Naperville has included contingency provisions to address funding for proposed projects may differ from the amounts shown in the event that final amounts are either higher or lower than projected. These provisions can be found in section **AP-35 Projects**.

Summary of 2015 Proposed Activities:

Applicant Agency	Activity Name	Goal Addressed	Outcome Indicator	Funding (estimated)
Bridge Communities	Roof Replacement	Support essential services and facility improvements to enable homeless persons to access suitable living environments	134 persons	\$150,000
City of Naperville	Grant Administration	CDBG Administration	N/A	\$ 40,000
City of Naperville	Analysis of Impediments to Fair Housing Choice Study	Complete a study to be used to develop strategies to enhance access to housing for minorities and special needs households	N/A	\$ 22,140
Community Housing Advocacy and Development (CHAD)	Wakefield Home Renovation Project	Add to the inventory of decent affordable rental housing for families	6 persons	\$ 43,900
DuPage PADS	Olympus Place Bathroom Rehabilitation	Support essential services and facility improvements to enable homeless persons to access suitable living environments	18 persons	\$ 49,050
Family Shelter Service	Intermediate Housing Rehabilitation	Support essential services and facility improvements to enable victims of domestic abuse to access suitable living environments	10 persons	\$ 27,225
Illinois Independent Living Center/Katharine Manor Apartments	Window Replacement	Improve the quality of decent affordable rental housing for physically disabled persons	33 persons	\$ 75,000
Naperville Elderly Homes	Elevator Repair and Upgrades	Improve the quality of decent affordable rental housing for seniors	126 persons	\$ 27,000
Naperville Heritage Society	Naperville-Haight House ADA Ramp	Enhance overall accessibility by reducing architectural barriers in public facilities	50 persons	\$ 57,000
Naperville Park District	Alfred Rubin Riverwalk Community Center ADA Improvements	Enhance overall accessibility by reducing architectural barriers in public facilities	2,350 persons	\$ 45,000
Ray Graham Association	Home Renovations: Swift CILA	Support essential services and facility improvements to enable special needs persons to access suitable living environments	5 persons	\$ 59,750
Senior Home Sharing, Inc.	Home Protection and Accessibility	Add to the inventory of decent affordable rental housing for seniors	9 persons	\$ 20,000
			2,741 persons	\$616,065

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. In partnership with HUD, the City has reviewed and reprogrammed disallowed funds from previous program years. Program Year 2015 will mark the final allocation of funds from Naperville's General Fund to the CDBG program, in accordance with the repayment plan agreed on by the City and HUD. A total of \$256,130 was allocated to CDBG in Program Years 2013 and 2014 and the final allocation of \$128,065 will be made by July 1, 2015 for a total of \$384,195. To date, the City has completed reprogramming of \$161,767 of this amount and will complete reprogramming of the remaining \$222,428 by the end of Program Year 2015.

Naperville will continue to request assistance from HUD staff as needed and comply with all HUD directives. In Program Year 2014, the City will achieve a timeliness ratio less than 1.5 times its annual grant allocation and is committed to maintaining timely expenditures of funds in Program Year 2015.

4. Summary of Citizen Participation Process and consultation process

This section will be included at the conclusion of the Citizen Participation process.

5. Summary of public comments

This section will be included at the conclusion of the public comment period.

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

This section will be included at the conclusion of the public comment period.

7. Summary

Program Year 2015 activities are expected to assist over 2,700 low and moderate-income people in Naperville through rental housing rehabilitation, homeless and special needs housing rehabilitation and public facility accessibility improvements. In addition, the development of a new Analysis of Impediments to Fair Housing Choice will provide a blueprint for future actions by the City to make decent affordable housing accessible and available to all residents.

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
Lead Agency – DuPage County Consolidated Plan (Program Years 2015-2019)	DUPAGE COUNTY	DuPage County Department of Community Services, Community Development Office
Lead Agency – Community Development Block Grant (CDBG) Program	NAPERVILLE	Transportation/Engineering/Development (TED) Business Group

Table 1– Responsible Agencies

Narrative:

DuPage County Role: DuPage County is the lead agency for the DuPage County HOME Consortium, of which Naperville is a member. As lead agency, DuPage County is responsible for preparing the Consolidated Plan, a document prepared every five years and submitted to the U.S. Department of Housing and Urban Development (HUD). The Plan analyzes affordable housing and community development needs and market conditions in the DuPage County Consortium area, consisting of DuPage County and the Will County portion of the City of Naperville. The Consolidated Plan is used to determine strategic goals and funding priorities for federal funding programs in partnership with citizens, local governments and nonprofit agencies. This Consolidated Plan covers Program Years 2015-2019.

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. Naperville receives an annual block 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. Grants are allocated by the U.S. Department of Housing and Urban Development on a formula basis.

The City of Naperville **Transportation/Engineering/Development Business Group (TED)** has full responsibility for implementing the CDBG program, including administering all grants and preparing the Annual Action Plan (AAP). The AAP outlines the actions, activities and programs that will take place during the year to address priority needs and goals. TED also prepares the Naperville sections of the Consolidated Plan which are included in this document.

Consolidated Plan Public Contact Information:

Naperville – Community Development Block Grant
(CDBG) Program/Consolidated Plan/AAP

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Community Planner/CDBG Coordinator
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Transportation/Engineering/Development (TED)
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DuPage County – DuPage County HOME Consortium
Consolidated Plan

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

1. Introduction

As the lead agency for development of the Consolidated Plan, DuPage County sought input from municipalities, townships, non-profit agencies, citizens and the DuPage Continuum of Care to identify needs and priorities of the Consolidated Plan. The City of Naperville consulted with the County and other municipalities through its membership in the HOME Advisory Group and the DuPage Continuum of Care (DuPage CoC). 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 the homeless in DuPage County. Naperville also participated in the Municipal Needs Survey sent to all municipalities in the county by DuPage County in March, 2014. Naperville's Transportation, Engineering and Development Business Group (TED) consulted with other City departments regarding Non-Housing Community Development Needs.

Naperville also maintains close contact with its own CDBG and Social Services Grant (SSG) grantees and with nonprofit agencies serving Naperville residents. As part of its Citizen Participation Plan, TED holds at least two public meetings/hearings per year to discuss the priorities and procedures of the CDBG and SSG programs. A City Council Workshop is held each fall to discuss proposed allocations for the two programs. The City also maintains informal contact with agencies and the public throughout the year.

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

The City of Naperville works closely with the DuPage County Consortium to coordinate strategic initiatives to meet housing, health, mental health, education, social services, and community development needs. The DuPage County Consortium coordinates the efforts of county-wide networks and coalitions by providing leadership; identifying priority needs, strategies, and funding opportunities; analyzing performance; and sharing knowledge with service providers, including the DuPage County Continuum of Care.

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 (DuPage CoC), 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 CoC 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 CoC.

In addition to participating in bi-annual DuPage CoC meetings, supporting agencies that provide assistance to the homeless is a high priority for both the City's CDBG and Social Services Grant programs. City staff works closely with subrecipients and grantees to implement the goals of the 2008 DuPage County Plan to End Homelessness, including homelessness prevention, outreach, rapid rehousing, maintaining/increasing affordable housing, providing supportive services and moving 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 recovering substance abusers; permanent 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.

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

The City of Naperville does not receive ESG funds, but does provide feedback and assistance with the development of performance standards, evaluation, and development of policies and procedures for HMIS administration through its participation in the DuPage CoC.

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

The City of Naperville participated in the consultation process undertaken by DuPage County to solicit input to determine needs and priorities for the 2015-2019 Consolidated Plan. As described above, Naperville completed a Municipal Needs Survey estimating its five-year needs for Public Facilities, Public Improvements and Public Services.

The City maintains ongoing communication and consultation with housing and social service providers serving the City of Naperville, in addition to conducting its own public participation process described in the sections on the Citizen Participation Process. A list of agencies participating in this process is shown in Table 2 below:

Sort Order	Select Organization	Agency/Group/Organization Type	What section of the plan was addressed by consultation?	Briefly describe how the Agency / Group / Organization was consulted
1	360 Youth Services	Services - Youth	ConPlan/AAP	Public Meeting
2	Bridge Communities	Housing Services - Homeless	ConPlan/AAP	Public Meeting
3	Community Access Naperville	Services – Persons with Disabilities	ConPlan/AAP	Public Meeting
4	Community Housing Advocacy and Development (CHAD)	Housing	ConPlan/AAP	Public Meeting
5	DuPage Children’s Museum	Services – Children	ConPlan/AAP	Public Meeting
6	DuPage Habitat for Humanity	Housing	ConPlan/AAP	Public Meeting
7	DuPage PADS	Housing Services - Homeless	ConPlan/AAP	Public Meeting
8	DuPage Senior Citizens Council	Services – Elderly Persons	ConPlan/AAP	Public Meeting
9	Ecumenical Adult Care	Services – Elderly Persons	ConPlan/AAP	Public Meeting
10	Edward Foundation	Services – Substance Abuse	ConPlan/AAP	Public Meeting
11	Family Shelter Service	Housing Services – Homeless	ConPlan/AAP	Public Meeting
12	Illinois Independent Living Center (IILC)	Housing	ConPlan/AAP	Public Meeting
13	KidsMatter	Services - Youth	ConPlan/AAP	Public Meeting
14	Literacy DuPage	Services - Education	ConPlan/AAP	Public Meeting
15	Loaves and Fishes	Other – Food Pantry	ConPlan/AAP	Public Meeting
16	NAMI DuPage	Services – Mental Health	ConPlan/AAP	Public Meeting
17	Naper Heritage Society	Other – Public Facilities	ConPlan/AAP	Public Meeting
19	Naperville CARES	Services – Homeless	ConPlan/AAP	Public Meeting
20	Naperville Elderly Housing	Housing Services – Elderly Persons	ConPlan/AAP	Public Meeting
21	Naperville Park District	Services – Elderly Persons	ConPlan/AAP	Public Meeting
22	PACT, Inc.	Services – Persons with Disabilities	ConPlan/AAP	Public Meeting
23	Project HELP	Services – Children & Families	ConPlan/AAP	Public Meeting
24	Ray Graham Association	Housing Services – Persons with Disabilities	ConPlan/AAP	Public Meeting
25	Robert Crown Center	Services – Substance Abuse	ConPlan/AAP	Public Meeting
26	Samaritan Interfaith Counseling	Services – Mental Health	ConPlan/AAP	Public Meeting
27	Senior Home Sharing	Housing Services – Elderly Persons	ConPlan/AAP	Public Meeting
28	Teen Parent Connection	Services – Children	ConPlan/AAP	Public Meeting
29	The Light of the Heart	Services – Mental Health	ConPlan/AAP	Public Meeting
30	Turning Pointe Autism Foundation	Services – Persons with Disabilities	ConPlan/AAP	Public Meeting

31	YMCA Safe 'n Sound	Services – Children	ConPlan/AAP	Public Meeting
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Table 2– Agencies, groups, organizations who participated

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

The County attempted to consult with a wide variety of nonprofit agencies and local organizations to complete the Plan. All Naperville grantees and subrecipients who received or applied for funding over the past three years were invited to the City’s public meetings/hearings. 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?
2015-2019 DuPage County Consortium Consolidated Plan	DuPage County	Needs Assessment/Market Analysis/Goals and Objectives

Table 3 - Other local / regional / federal planning efforts

Narrative:

Naperville will continue to work with DuPage and Will Counties to implement the Consolidated Plan and will continue its efforts to collaborate with other local, regional, state, and federal agencies when appropriate to develop future projects, improve efficiency and reduce the duplication of efforts.

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

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

Naperville residents, public service organizations, and other interested parties are encouraged to participate in the development of the Consolidated Plan, Annual Action Plans and evaluation of the annual performance report through public meetings and public hearings held at various stages of plan development. The City of Naperville opened its Program Year 2015 Community Development Block Grant (CDBG) public participation process and call for projects by holding a public meeting/pre-application information session from 10:00 a.m. – 12:00 noon on Wednesday, September 17, 2014 at the Naperville Municipal Center. The public meeting and call for projects also included the city-funded Social Services Grant (SSG) program for Fiscal Year 2016 (May 1, 2015-April 30, 2016). City staff provided an overview of both programs and presented information on the Annual Action Plan (AAP) process, including program priorities, funds available, timetables, application procedures, evaluation criteria and changes from the previous year. A total of 44 participants attended and had the opportunity to comment and ask questions regarding community development priorities, plans and programs. City staff was also available to answer additional questions and provide technical assistance with applications prior to the application due date on Wednesday, October 15, 2014.

A City Council Workshop was held from 5:00 p.m. to approximately 8:00 p.m. on Monday, November 24, 2014 to review the applications and proposed funding recommendations. The council had the opportunity to ask questions about specific proposals and their relationship to community development priorities, as well as the rationale for specific funding recommendations. Although public comments were not taken, the meeting was fully open to the public and approximately 50 people attended. The workshop was also broadcast on cable TV channel WCNC.

Both the public meeting/pre-application information session and City Council Workshop were publicized in advance on the City's website, <http://www.naperville.il.us>, and through press releases to local media outlets. Materials presented at the public meeting, including PowerPoint presentations and applications, were available on the website on the day following the meeting. In addition, previous applicants for funding received direct emails advertising the information session and call for projects.

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 Sunday, January 4, 2015. 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 2015 Annual Action Plan and Naperville section of the Program Years 2015-2019 DuPage County Consortium Consolidated Plan were posted on the City of Naperville website, www.naperville.il.us, at the Naperville Municipal Center and at three Naperville public library locations from Wednesday, January 7, 2015 to Friday, February 6, 2015. A public hearing to hear citizen comments on the plan will be held at 7:00 p.m., Tuesday, February 3,

2015. The full DuPage County Consolidated Plan is available on the County’s website, www.dupageco.org/Community_Services/Community_Development_Commission/1310/, with hard copies available at the County Complex, 421 N. County Farm Road, Room 3-100, Wheaton, IL 60187.

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 44 people attended the public meeting/information session on September 17, 2014, not including city staff.	Attendees asked numerous questions regarding programs, evaluation criteria and application submission. All questions were answered in as much detail as possible.	No comments or questions were declined.	
2	City Council Workshop	Non-targeted, broad community	The workshop, held on November 24, 2014, was attended by approximately 50 people, plus city staff and elected officials.	The meeting was not open for public comment.	Not applicable.	
3	Public Hearing	Non-targeted, broad community	To be held on February 3, 2015.	To be added.	Not applicable.	www.naperville.il.us

Table 4– Citizen Participation Outreach

Annual Action Plan

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

Introduction:

As a metropolitan city with over 50,000 residents, Naperville qualifies as an entitlement community for the federal Community Development Block Grant (CDBG) Program. Entitlement communities receive annual grants from the U.S. Department of Housing and Urban Development (HUD) to carry out a wide range of community development activities directed towards revitalizing neighborhoods, increasing economic development, and providing improved 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 threat to the health or welfare of the community. Grantees have wide 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 the use of CDBG funds based on the priorities set forth in the five-year Consolidated Plan developed by DuPage County with Naperville's input.

Allocations for each CDBG entitlement grantee are determined annually by HUD following adoption of the federal budget by Congress. At this writing, the City of Naperville has not received its Program Year 2015 (April 1, 2015 – March 31, 2016) allocation. However, based on prior year's funding levels, the City estimates that it will receive approximately \$400,000. No program income is anticipated, though the City does anticipate that approximately \$88,000 in funds from prior year activities that came in under budget will also be available. In addition, the City will transfer \$128,065 from its General Fund to a fund to be used for CDBG projects. These funds are available as part of an agreement with HUD to repay CDBG funds used for ineligible projects from prior years. The Program Year 2015 repayment will be the third and final installment of a total repayment amount of \$384,195. Two previous general fund transfers of \$128,065 were made in both Program Years 2013 and Program Year 2014. The total amount of CDBG funds available for Program Year 2015 from these three sources – annual allocation, unspent funds and repayment funds - is estimated to be \$616,065. ***This number is subject to change depending on the actual allocation amount received from HUD and actual expenditures for activities currently underway. Please see the Contingency Provisions under AP-35 Projects for information on how funding priorities will be addressed in the event that the final HUD allocation is different from the projected allocation of \$400,000.***

Other federal resources that may be available to Naperville residents include funds from the Section 8 Housing Choice Voucher Program, Social Security Disability (SSI) Program, HOME Investment Partnerships Act (HOME), Emergency Solutions Grant (ESG), Homeless Continuum of Care programs, Permanent Housing for the Handicapped Program, Emergency Community Services Homeless Grant Program, Low-Income Home Energy Assistance Program (LIHEAP) and Low-Income Housing Tax Credits (LIHTC). These programs are available to low and moderate income individuals and households directly,

and to non-profit organizations, private developers and local governments for programs to assist these persons. The funds are administered by DuPage County, federal, state and local agencies. Actual dollar amounts available are dependent on income eligibility and funding availability.

Anticipated Resources:

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Reminder 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	400,000	0	88,000	488,000	1,600,000	As a Community Development Block Grant (CDBG) entitlement community, the City of Naperville estimates a Program Year 2015 allocation of approximately \$400,000. Approximately \$216,000 in additional funds is also anticipated: \$88,000 from unspent funds from prior years and \$128,065 in reprogrammed funds for disallowed activities (see below).
General Fund	public - local	Acquisition Economic Development Housing Public Improvements Public Services	128,065	0	0	128,065	0	In addition to the annual CDBG allocation and unspent CDBG prior year funds, \$128,065 in general fund monies will be allocated to CDBG activities as repayment for CDBG funds used for ineligible projects from prior years. The PY2015 repayment will be the third and final installment in a total repayment amount of \$384,195. Previous general fund transfers of \$128,065 were made in PY2013 and PY2014.

Table 5 - Expected 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 HOME Consortium Consolidated Plan. Although there are no specific matching requirements for CDBG-funded projects, project evaluation criteria also include the extent to which CDBG funds are leveraged against other funds.

CDBG subgrantees make use of a wide variety of state, local, corporate, foundation and 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 (CILA) 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.

An extremely important local funding source is the City of Naperville's Social Services Grant (SSG) Program. An annual allocation of \$500,000 from the City's General Fund is used to fund the SSG which provides direct grants to social service organizations that assist Naperville residents. Grants may be used for program costs, salaries, supplies and materials. The call for projects for the SSG takes place at the same time as the CDBG call for projects and the applications and evaluation criteria are similar. Applications for SSG funding that meet CDBG requirements may be funded under that program depending on funding availability. For 2015-2016, four organizations receiving a total of \$156,025 in CDBG funds for capital improvements will also receive \$55,050 in SSG funds for program support. Another 20 organizations will receive \$444,950 in SSG funds to support a wide variety of services available to the low and moderate-income clientele of organizations receiving CDBG funds. These services include employment counseling, emergency financial assistance, education/literacy, food assistance, home repairs, mental health counseling, parenting skills/child abuse prevention, senior services, youth services, substance abuse prevention and recovery, supportive housing services and special recreation.

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

Two projects will address the need to ensure that all public facilities are fully ADA-compliant:

- 1) Naperville Heritage Society: Naper-Haight House ADA Ramp – Accessibility improvements to a museum building located on city-owned land.
- 2) Naperville Park District: Alfred Rubin Riverwalk Community Center ADA Improvements – Accessibility improvements to a park district facility housing a senior center and senior services.

Discussion:

The City of Naperville seeks to ensure that CDBG funds are used to their maximum effectiveness by making cost reasonableness and efficient leveraging of CDBG funds part of the evaluation criteria for proposed projects. Applications are competitive and the greater the degree of leveraging, the higher the number of points awarded to the project.

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	Geog. Area	Priority Needs Addressed	Funding	Goal Outcome Indicator
1	Affordable Housing: Rehab Rental Units	2015	2015	Affordable Housing	Citywide	Housing Rehabilitation: Affordable Rental Units	\$226,275	174 individuals
2	Suitable Living Environment: Homeless Housing	2015	2015	Homeless	Citywide	Homeless Housing: Transitional/ Permanent Housing	\$165,900	162 individuals
3	Suitable Living Environment: Special Needs Housing	2015	2015	Non-Homeless Special Needs	Citywide	Housing Rehabilitation: Special Needs	\$59,750	5 individuals
4	Viable Urban Communities: Accessibility	2015	2015	Non-Housing Comm. Devel.	Citywide	ADA Compliance: Public Facilities/Senior Facilities	\$102,000	2,400 individuals

Table 6 – Annual Goals Summary

Goal Descriptions:

- **Preserve Affordable Housing: Rehab Rental Units** – To improve the quality of affordable rental housing.
- **Provide a Suitable Living Environment: Homeless Housing** – To support essential services and facility improvements to enable homeless persons to access suitable living environments.
- **Provide a Suitable Living Environment: Special Needs Facilities** - To support essential services and facility improvements to enable persons with special needs to access suitable living environments.
- **To Create Viable Urban Communities: Public Facilities** – To enhance the overall accessibility of for disabled persons by reducing architectural barriers in public facilities.

Table 28 – Goal Descriptions

AP-35 Projects - 91.420, 91.220(d)

Introduction:

Proposed activities and outcomes for Program Year 2015 are summarized below:

Summary of 2015 Proposed Activities:

Sort #	Applicant Agency	Activity Name	Goal Addressed	Goal Outcome Indicator	Funding (estimated)
1	Bridge Communities, Inc.	Roof Replacement	Support essential services and facility improvements to enable homeless persons to access suitable living environments.	134 persons	\$150,000
2	City of Naperville	Grant Administration	CDBG Administration	N/A	\$ 40,000
3	City of Naperville	Analysis of Impediments to Fair Housing Choice Study	Complete a study to be used to develop strategies to enhance access to housing for minorities and special needs households.	N/A	\$ 22,140
4	Community Housing Advocacy and Development (CHAD)	Wakefield Home Renovation Project	Add to the inventory of decent affordable rental housing for families.	6 persons	\$ 43,900
5	DuPage PADS	Olympus Place Bathroom Rehabilitation	Support essential services and facility improvements to enable homeless persons to access suitable living environments.	18 persons	\$ 49,050
6	Family Shelter Service	Intermediate Housing Rehabilitation	Support essential services and facility improvements to enable victims of domestic abuse to access suitable living environments.	10 persons	\$ 27,225
7	Illinois Independent Living Center/Katherine Manor	Window Replacement	Improve the quality of decent affordable rental housing for physically disabled persons.	33 persons	\$ 75,000
8	Naperville Elderly Homes	Elevator Repair and Upgrades	Improve the quality of decent affordable rental housing for seniors.	126 persons	\$ 27,000
9	Naperville Heritage Society	Naperville-Haight House ADA Ramp	Enhance overall accessibility by reducing architectural barriers in public facilities.	50 persons	\$ 57,000
10	Naperville Park District	Alfred Rubin Riverwalk Community Center ADA Improvements	Enhance overall accessibility by reducing architectural barriers in public facilities.	2,350 persons	\$ 45,000
11	Ray Graham Association	Home Renovations: Swift CILA	Support essential services and facility improvements to enable special needs persons to access suitable living environments.	5 persons	\$ 59,750
12	Senior Home Sharing, Inc.	Home Protection and Accessibility	Add to the inventory of decent affordable rental housing for seniors	9 persons	\$ 20,000
				2,741 persons	\$616,065

Table 7 – Project Information

Contingency Provisions

Per HUD NOTICE CPD-14-015 HUD has provided Grantees “Guidance on Submitting Consolidated Plans and ConPlan/Annual Action Plans for Fiscal Year (FY) 2015.” This guidance instructs grantees not to submit their Consolidated plan and/or Annual Action Plan until after HUD announces the Program Year 2015 formula allocation amounts.

Since the amount of Naperville’s actual Program Year 2015 grant allocation is unknown at the time of posting of the draft plan (January 7, 2015), the anticipated CDBG allocation of \$400,000 is an estimate, and in the event that the final CDBG allocation is higher or lower than \$400,000, the City of Naperville may add, subtract or transfer amounts among identified projects, as noted below, without publishing a substantial amendment. In the event that actual grant amounts are more or less than anticipated, contingency provisions include:

- **In the event that the final grant allocation exceeds \$400,000**, the City may undertake the following changes in proposed activities:
 - Increase the funding amount for Activity #2 , Grant Administration to an amount up to but not exceeding \$10,000 for a total funded amount of \$50,000, with total administration costs to remain within the 20% HUD cap on administrative activities/planning activities;
 - Increase the funding amount for Activity #3 , Analysis of Impediments to Fair Housing Choice up to but not exceeding \$2,860 for a total maximum funded amount of \$25,000, with total administration costs to remain within the 20% HUD cap on administrative/planning activities;
 - Add Activity #13 , Naperville CARES, Emergency Rent/Utility Assistance, in an amount up to but not exceeding \$42,000, with total public services costs to remain within the 15% HUD cap on public service activities;
- **In the event that the final grant allocation is less than \$400,000**, the proposed funding amounts for all activities will be proportionally decreased to match the actual allocation amount.

HUD has issued a “*Waiver of 24 CFR 570.200(h) regarding FY 2015 Action Plans Community Development Block Grant (CDBG) Program*”. This waiver allows CDBG grantees to incur eligible costs prior to the award of Program Year 2015 funding. In the event that the award of Program Year 2015 funding is delayed, the City intends to utilize this waiver to the extent necessary to treat the

effective date of the grant agreement as the program year start date (April 1, 2015) or the date that the Consolidated Plan and/or Annual Action Plan (with actual allocation amounts) is received by HUD, *whichever is earlier*.

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

To prepare the Consolidated Plan, DuPage County conducted extensive research including data analysis of census data and surveys of both municipal and non-profit agencies. This data was used to develop high and low priorities, and goals and objectives. All projects meet the national objectives of the CDBG program and are designed to address the needs of low and moderate-income persons in one of the following categories:

- **Families in Crisis** – projects that meet the needs of families in critical circumstances; including basic needs such as food, clothing, medical care, etc.
- **Housing/Homeless** – projects providing housing to low-income households and homeless persons.
- **Elderly** – projects that meet the needs of the elderly.
- **People with Disabilities** – projects providing services to people with disabilities, including housing.

The projects meet these needs by achieving one of the following goals:

- **Provide Decent Housing: Rehab Rental Units** – To improve the quality of affordable rental housing.
- **Provide a Suitable Living Environment: Homeless Housing** – To support essential services and facility improvements to enable homeless persons to access suitable living environments.
- **Provide a Suitable Living Environment: Special Needs Facilities** - To support essential services and facility improvements to enable persons with special needs to access suitable living environments.
- **To Create Viable Urban Communities: Public Facilities** – To enhance the overall accessibility of for disabled persons by reducing architectural barriers in public facilities.

Applicant organizations were also required to demonstrate that their projects addressed a documented community need, demonstrated reasonable costs, and leveraged CDBG funds against other public or private funding. Organizations were required to document their experience and past performance, as well as their current capacity to successfully complete the proposed project in a timely fashion.

The primary obstacles to meeting underserved needs are the unavailability and uncertainty of adequate funding for projects which is compounded by the difficulties of funding housing-related projects in a high-cost community such as Naperville. These issues are addressed at greater length in the section on Actions planned to address obstacles to meeting underserved needs.

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:

The City of Naperville will not direct assistance to specific geographic areas during the 2015 program year. Projects selected for funding represent several neighborhoods and were chosen for their ability to meet the national objectives of the CDBG program and the goals of the Consolidated Plan. All of the projects will primarily or exclusively benefit low and moderate income individuals with emphasis on low-income renters, homeless persons transitioning to permanent housing, and persons with special needs.

Geographic Distribution

Target Area	Percentage of Funds
N/A	N/A

Table 8 - Geographic Distribution

Rationale for the priorities for allocating investments geographically:

The City of Naperville has not directed assistance to any specific geographic area for Program Year 2015.

Discussion

The City of Naperville will continue to monitor conditions in areas with concentrations of low-income and minority households and will consult with city agencies and social service organizations serving households in these areas to determine how best to assist these households.

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

Introduction:

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

- Meeting Underserved Needs
- Fostering and Maintaining Affordable Housing
- Reducing Lead-Based Paint Hazards
- Reducing the Number of Poverty-Level Families
- Developing Institutional Structure
- Enhancing Coordination Between Public and Private Housing and Social Service Agencies

Actions planned to address obstacles to meeting underserved needs:

The City will closely review the new Consolidated Plan for Program Years 2015-2019 and will consider its priorities for CDBG allocations accordingly. 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.

City staff will continue to participate in the DuPage County HOME Advisory Commission to learn about available services and advise the commission about Naperville's specific needs. The City will also review the recommendations of a report on ADA compliance in public facilities being prepared by Naperville's Advisory Commission on Disabilities.

Knowledge obtained from the above sources will be 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. This year, the City received eligible applications for CDBG funding totaling \$1,082,225.00, of which only \$616,065.00 could be funded. This amount will be further reduced after Program Year 2015 when the City completes its repayment agreement with HUD. The actual amount of the CDBG allocation fluctuates from year to year and is influenced by factors beyond the City's control. 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:

The City of Naperville is expected to reach residential build-out within the next five to ten years. The high cost of developing land makes the construction of affordable housing a challenge in the undeveloped areas of the City. Undeveloped farmland in the Naperville area has sold for as high as \$80,000 per acre, which forces developers to build larger homes for over \$300,000 in order to break

even or make a profit. With a median home value of \$377,400 (2013 American Community Survey) acquiring affordable existing units is also a challenge, even in lower-cost areas of the City. To address some of the barriers to the provision of affordable housing, the Staff will undertake the following strategies:

- Develop a new Analysis of Impediments to Fair Housing Choice. The City's most recent Analysis of Impediments to Fair Housing Choice was developed in 2007. The City has committed to updating this study in Program Year 2015 and has allocated a total of \$25,000 in CDBG and SSG funds to hire a consultant to conduct the study and develop recommendations based on it. Once the results of the study are available, staff will work to develop programs, educational materials and incentives based on its recommendations.
- Update Current Affordable Housing Technical Assistance Materials. – The City will update existing technical assistance materials, including the Affordable Housing Toolkit and other items available on the City of Naperville website.
- Work with the Housing Advisory Commission to Plan an Educational Event Promoting Affordable Housing. TED Business Group staff will work with the City's Housing Advisory Commission to plan a Housing Fair for Spring, 2015. The fair will include speakers on a variety of affordable housing-related topics, including affordable homeownership, avoiding foreclosure, credit repair, home maintenance, grants and assistance, fair housing, and tenant/landlord rights and responsibilities.
- Work with local agencies to assess the current demand for affordable owner and renter units in the City of Naperville. Working in collaboration with local agencies will result in creative solutions for the affordable housing challenges that the City of Naperville is facing as it approaches build-out. By identifying the existing demand for affordable units in the City, City staff and local agencies can work together to meet these needs.
- Work with interested developers and community partners on proposed affordable housing developments. The City should ensure that developers are aware of the density bonuses and other provisions within the Municipal Code granted for developments inclusive of affordable units. Staff may research other programs and incentives to promote the preservation and development of affordable housing.

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 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. The City has an arrangement with DuPage County to assist the City in lead-based paint abatement. All CDBG-funded projects will also take the potential presence of asbestos into consideration.

Most of the potential lead-based paint hazards in Naperville are restricted to the older area of the City where the majority 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:

According to the most recent U.S. census data (2009-2013 American Community Survey Five-Year Estimates), only about 4.1 percent of Naperville residents had incomes below the poverty level. However, this percentage represents an increase from the 2010 U.S. Census, which recorded a poverty rate of 3.4 percent, and from the 2000 U.S. Census, which showed a poverty rate of only 2.2 percent. In addition, certain population groups had a significantly higher poverty rate: For female-headed households with children under 18, the poverty rate was 16.9 percent. This figure equates to over 400 families below the poverty level. To assist poverty-level families, Naperville will implement the following strategies in Program Year 2015:

- Community Development Block Grant (CDBG) Program: A total of \$43,900 in CDBG funds will be allocated to a project to rehabilitate a vacant single-family home which will be rented to a low-income family at an affordable rate. Another \$165,900 will be allocated to three projects to improve housing for homeless families working to achieve self-sufficiency and return to permanent housing. Together, the four projects will assist 168 individuals.
- Social Services Grant (SSG) Program: The Social Services Grant (SSG) Program is a crucial component of the City's strategy to reduce the number of poverty-level families. For the 2016 Fiscal Year, a total of \$500,000 will be allocated to organizations and programs that provide assistance to low-income families. These programs include emergency rent and utility assistance, emergency housing, food assistance, employment counseling, substance abuse counseling, mental health counseling, youth services and after-school programs.

In addition to funding specific activities, the City will take the following actions:

- Affordable Housing: Work with social service providers, other governmental and local agencies to encourage the provision of additional transitional housing units, affordable rental housing units and affordable housing units for homeownership. The latter will help empower residents who are ready to move on from transitional units and make the units available for other residents in need.
- Homelessness Prevention: Work with social service providers, other governmental and local agencies to further identify the needs of those threatened with poverty and to find resources to meet those needs. This will involve referral for counseling, assistance in paying rent, or

providing transportation.

- Neighborhood Improvements: Work with the Naperville Police Department, affordable housing providers and local agencies to implement the Community Policing Through Environmental Design (CPTED) program in low-income and high crime areas. Monitor conditions these areas and work with city agencies and social service organizations to develop neighborhood-based programs to assist these families.
- Youth and Family Services: Work to provide services for low-income youth, including after-school programs.

Actions planned to develop institutional structure:

The City of Naperville Transportation, Engineering and Development (TED) Business Group will work with city departments, local service providers, and agencies from DuPage County and Will County to implement the new Consolidated Plan goals and strategies for 2015-2019.

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 Homelessness Continuum of Care and the DuPage County HOME Advisory Commission to learn and provide advice on how homelessness and affordable housing programs are implemented 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. We will work closely with these organizations to enhance coordination between public and private agencies and between nonprofit agencies providing different services to the same clientele. Many nonprofit agencies have already developed these partnerships and the City will consult with them to determine how we help to enhance these efforts.

Discussion:

See individual sections above.

Program Specific Requirements

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

Introduction

Community Development Block Grant Program (CDBG)

Reference 24 CFR 91.220(I)(1)

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

1. The total amount of program income that will have been received before the start of the next program year and that has not yet been reprogrammed
 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
 3. The amount of surplus funds from urban renewal settlements
 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.
 5. The amount of income from float-funded activities
- Total Program Income

Other CDBG Requirements

1. The amount of urgent need activities

Discussion

- The City of Naperville does not anticipate receiving program income prior to Program Year 2015.
- The City of Naperville has not used section 108 loan guarantees.
- The City of Naperville will not receive surplus funds from urban renewal settlements.
- All grant funds anticipated to be returned to the line of credit have been included in a prior statement or plan.
- The City of Naperville will not receive income from float-funded activities.
- The City of Naperville does not anticipate any urgent need activities.