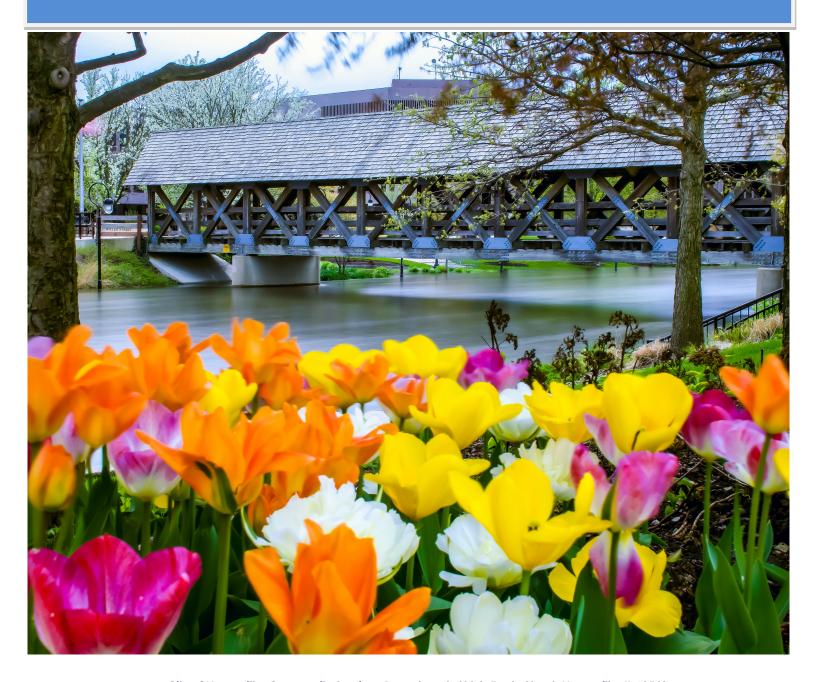
CITY OF NAPERVILLE Scott Wehrli, Mayor

COMMUNITY SERVICES DEPARTMENT

2022 CONSOLIDATED
ANNUAL
PERFORMANCE
AND
EVALUATION REPORT
(CAPER)





### **CR-05 - Goals and Outcomes**

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

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

Entitlement Funds: For PY 2022, the City of Naperville received \$531,150 in CDBG entitlement grant funds. These funds were allocated to 11 projects, including Grant Administration. Major initiatives included the following:

- 1) Affordable Rental Housing Rehabilitation \$30,456 to acquire a two-bedroom condominium for use as a permanently affordable rental unit in an apartment building providing affordable, accessible housing to low and moderate-income disabled homeowners and renters and \$32,172 to remove and replace an existing deteriorated concrete walkway at a 187-unit apartment complex providing affordable rental housing for low and moderate-income seniors.
- 2) Homeless Housing and Supportive Services \$62,698 for energy efficiency rehabilitation projects at two apartment buildings providing transitional housing and supportive services to formerly homeless households and \$188,000 to assist the purchase of a 130-unit former motel building for conversion into an Interim Housing Center providing temporary shelter, meals, case management and supportive services to homeless families and individuals transitioning back to permanent housing.
- 3) Special Needs Housing and Supportive Services \$48,810 to rehabilitate three CILA (Community Integrated Living Arrangement) homes in Naperville for three organizations providing housing and services to adults with severe physical and mental disabilities.
- 4) Non-Housing Community Development: Homeless \$63,920 to a public service preventing homelessness through emergency rent and utility assistance to persons at risk of homelessness.
- 5) Non-Housing Community Development: Public Services \$15,745 to provide on-site services to formerly chronically homeless persons living in supportive housing.
- 6) Non-Housing Community Development: Public Facilities \$28,200 to replace the dock plates at a food distribution center serving food banks and pantries in DuPage County, including those in Naperville.

# 7) Administration/Planning - \$61,100 was allocated to Administration/Planning expenses

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

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

Goal	Category	Source / Amount	Indicator	Unit of Measure	Expected  - Strategic Plan	Actual – Strategic Plan	Percent Complete	Expected  - Program Year	Actual – Program Year	Percent Complete
Administration & Planning	Planning & Administration	CDBG:	Other	Other	1	1	100.00%	1	1	100.00%
Affordable Owner-Occupied Housing	Affordable Housing	CDBG:	Homeowner Housing Rehabilitated	Household Housing Unit	34	0	0.00%			
Affordable Rental Housing	Affordable Housing	CDBG:	Rental units rehabilitated	Household Housing Unit	302	32	10.60%	187	0	0.00%
Affordable Rental Housing	Affordable Housing	CDBG:	Other	Other	1	1	100.00%	1	1	100.00%
Homeless Housing and Supportive Services	Homeless	CDBG:	Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit	Households Assisted	146	79	54.11%	69	53	76.81%

Homeless Housing and Supportive Services	Homeless	CDBG:	Homeowner Housing Added	Household Housing Unit	0	0		0	0	
Homeless Housing and Supportive Services	Homeless	CDBG:	Homeowner Housing Rehabilitated	Household Housing Unit	0	0		0	0	
Homeless Housing and Supportive Services	Homeless	CDBG:	Housing for Homeless added	Household Housing Unit	0	0		0	0	
Homeless Housing and Supportive Services	Homeless	CDBG:	Housing for People with HIV/AIDS added	Household Housing Unit	0	0		0	0	
Non-Housing Community Development: Accessibility	Non-Housing Community Development	CDBG:	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	3000	0	0.00%			
Non-Housing Community Development: Homeless	Non-Housing Community Development	CDBG:	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	1500	95	6.33%			

Non-Housing Community Development: Homeless	Non-Housing Community Development	CDBG:	Public service activities for Low/Moderate Income Housing Benefit	Households Assisted	0	0		280	95	33.93%
Non-Housing Community Development: Infrastructure	Non-Housing Community Development	CDBG:	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	80	0	0.00%			
Non-Housing Community Development: Pub. Facilities	Non-Housing Community Development	CDBG:	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	1050	14079	1,340.86%			
Non-Housing Community Development: Pub. Facilities	Non-Housing Community Development	CDBG:	Other	Other	0	0		10000	0	0.00%
Non-Housing Community Development: Pub. Services	Non-Housing Community Development	CDBG:	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	91	0	0.00%			

Non-Housing Community Development: Pub. Services	Non-Housing Community Development	CDBG:	Public service activities for Low/Moderate Income Housing Benefit	Households Assisted	0	0		11	0	0.00%
Non-Housing Community Development: Pub. Services	Non-Housing Community Development	CDBG:	Businesses assisted	Businesses Assisted	20	20	100.00%			
Special Needs Housing and Supportive Services	Non-Homeless Special Needs	CDBG:	Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit	Households Assisted	28	16	57.14%	14	0	0.00%
Special Needs Housing and Supportive Services	Non-Homeless Special Needs	CDBG:	Rental units rehabilitated	Household Housing Unit	0	0		0	0	
Special Needs Housing and Supportive Services	Non-Homeless Special Needs	CDBG:	Homeowner Housing Rehabilitated	Household Housing Unit	0	0		0	0	
Special Needs Housing and Supportive Services	Non-Homeless Special Needs	CDBG:	Housing for Homeless added	Household Housing Unit	0	0		0	0	

Special Needs			III. San Car Barrela	11					
Housing and	Non-Homeless	CDBG:	Housing for People	Household	_			_	
Supportive	Special Needs	\$	with HIV/AIDS	Housing	0	0	0	0	
Services			added	Unit					

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

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

Entitlement Funds: Naperville's CDBG projects have emphasized preservation and rehabilitation of existing affordable units, both owner and renter occupied. The City has focused the most resources on rehabilitating and acquiring rental housing, since the majority of low and moderate income residents are renters. The City has also provided significant support to homelessness prevention, transitional housing rehabilitation and public services for people in both interim and supportive housing, as these residents are most likely to be living in poverty and in danger of returning to homelessness. The City has also given high priority to assisting residents with disabilities by supporting special needs housing rehabilitation and acquisition, services for people with special needs, and eliminating archiectural barriers in public facilities.

Program Year 2022 was the third year of the 2020-2024 Consolidated Plan. Projects funded by the City of Naperville for PY 2022 focused on six of the eight goals outlined in the plan: (1) Affordable Rental Housing, (2) Homeless Housing and Supportive Services, (3) Special Needs Housing and Supportive Services, (4) Non-Housing Community Development Homelessness Prevention, (5) Non-Housing Community Development Public Services, (6) Non-Housing Community Development Public Facilities. Completion of projects within the program year was impacted by late receipt of the PY 2022 allocation amount and funds. Two projects were able to be completed within the program year and all other projects continue are underway with anticipated completion in PY 2023.

# CR-10 - Racial and Ethnic composition of families assisted

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

	CDBG
White	38
Black or African American	48
Asian	9
American Indian or American Native	0
Native Hawaiian or Other Pacific Islander	0
Total	95
Hispanic	22
Not Hispanic	73

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

## **Narrative**

Approximately 40% of families assisted were white, 51% were black or African American, 9.5% were Asian. Hispanic ethnicity for all races accounted for approximately 23% of all families assisted.

# CR-15 - Resources and Investments 91.520(a)

## Identify the resources made available

Source of Funds	Source	Resources Made Available	Amount Expended During Program Year
CDBG	public - federal	531,150	300,768

**Table 3 - Resources Made Available** 

#### Narrative

In PY 2022, Naperville received a CDBG Entitlement Grant of \$531,150 to fund PY 2022 projects. No new allocations of CARES Act funds for program income were received in PY 2022. Due to project delays caused by the COVID-19 pandemic and projects from previous program years still underway, no prior year funds were included in PY 2022 resources.

CDBG funds expended on eligible CDBG projects in PY 2022 totaled approximately \$1,061,122. Although the program year began April 1, 2022, the City did not receive its PY 2022 funding agreement until September 2022. Therefore, all PY 2022 funds spent during the program year were expended between September 2022 and the end of the program year on March 31, 2023. A breakdown of the PY 2022 expenditures by program year is provided in Attachment 2.

## Identify the geographic distribution and location of investments

Target Area	Planned Percentage of Allocation	Actual Percentage of Allocation	Narrative Description
			Incorporated City of
City of Naperville	59	59	Naperville, IL

Table 4 – Identify the geographic distribution and location of investments

#### **Narrative**

Two PY 2022 projects, CD2203 DuPage PADS Hotel Acquisition Interim Housing project and CD2208 Northern Illinois Food Bank Dock Plate Replacement project are located outside the City. The location of CD2203 is in Downers Grove, Illinois. The project serves individuals whose last reported address was within Naperville. The location of CD2208 is in Geneva, Illinois. The project serves food pantries and banks across DuPage County, including in Naperville. All other PY 2020, PY 2021, PY 2022 and COVID expenditures during the program year were expended for projects located within the incorporated boundaries of the City of Naperville.

#### Leveraging

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

**Matching Requirements:** None of the projects completed during the program year were subject to matching requirements.

**Publicly Owned Land or Property:** None of the projects completed during the program year involved publicly owned land or property.

Leveraging Additional Resources: PY 2022 funded projects from all years leveraged \$1,061,122 in CDBG funds with other funds from a variety of sources reported by subrecipients to successfully conduct their projects. These funding sources included unrestricted general operating funds, bank loans, donations, public and private grants, special event fundraising and other philanthropy. All project management activities needed to complete the projects including procurement, supervision, accounting, income verification and statistical report preparation were carried out by staff of the subrecipient agencies.

# CR-20 - Affordable Housing 91.520(b)

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

	One-Year Goal	Actual
Number of Homeless households to be		
provided affordable housing units	50	53
Number of Non-Homeless households to be		
provided affordable housing units	9	0
Number of Special-Needs households to be		
provided affordable housing units	9	0
Total	68	53

Table 5 – Number of Households

	One-Year Goal	Actual
Number of households supported through		
Rental Assistance	280	95
Number of households supported through		
The Production of New Units	0	0
Number of households supported through		
Rehab of Existing Units	187	0
Number of households supported through		
Acquisition of Existing Units	1	1
Total	468	96

Table 6 - Number of Households Supported

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

Entitlement Funds: The affordable housing goals shown above represent goals included in the PY 2022 Annual Action Plan. The PY 2022 Annual Action Plan included funding for the affordable housing activities summarized below:

**Homeless and Formerly Homeless Households Supported -** \$62,698 was allocated for rehabilitation projects at two 8-unit apartment buildings providing transitional housing and social services to formerly

homeless households and was projected to impact 9 households. The project was delayed due to prioritization of prior year funding projects that were delayed due to COVID. The project is not yet completed. In addition, \$188,000 was allocated for assisting the purchase of a hotel for conversion into an Interim Housing Center projected to impact 50 homeless households, with 53 households reported at project completion.

**Special Needs Housing and Supportive Services** - \$48,810 was allocated to rehabilitate 3 CILA homes for organizations providing housing and services to adults with severe physical and mental disabilities. The organizations are Little Friends (\$14,100, projecting 4 households served), Ray Graham Association (\$14,100 projecting 1 household served) and UCP Seguin (\$20,610 projecting 4 households served). All 3 projects were delayed due to the late start of the program year and all 3 are underway and not yet completed.

**Households supported through Rental Assistance:** \$63,920 in PY 2022 funds was allocated to a public service to prevent homelessness by providing emergency rent, mortgage and utility assistance to persons at risk of homelessness, with a goal of assisting 280 individuals. Due to the program year start being delayed until September, 95 individuals have been assisted to date and \$12,913 remains to be expended for the project.

**Households supported through Production of New Units:** None. The City of Naperville generally does not use CDBG funds to support the production of new housing units. Naperville is a largely built out community with high land and construction costs; therefore, production of new units with CDBG funds would not be cost-efficient.

**Households Supported through Rehab of Existing Units -** \$32,172 was allocated to rehabilitate concrete walkways and masonry at a 187-unit apartment complex providing affordable rental housing for low-and moderate-income seniors. The project was delayed due to the late start of the program year impacting weather and is now underway.

**Households Supported through Acquisition of Existing Units -** \$30,456 was allocated to acquire a two-bedroom condominium and preserve it as permanently affordable rental housing for individuals with physical disabilities. The purchase was completed, and the unit is secured.

#### Discuss how these outcomes will impact future annual action plans.

PY 2022 Projects continued the City's focus on preservation and rehabilitation of existing affordable units, primarily rental units, occupied by vulnerable low- and moderate-income populations. These populations primarily include people who are homeless and formerly homeless, people with physical and mental disabilities and senior citizens. Projects approved in succeeding years of this Consolidated Plan will continue to emphasize affordable rental housing preservation and rehabilitation as affordable rental units. The City will continue to support affordable housing for special needs households and the development of transitional housing and permanent supportive housing for individuals who were

homeless. Increased emphasis will be focused on housing preservation through rehabilitation for lowand moderate-income homeowners and the development of new affordable units and acquisitions of affordable units where feasible.

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

Number of Households Served	CDBG Actual	HOME Actual
Extremely Low-income	49	0
Low-income	5	0
Moderate-income	0	0
Total	54	0

Table 7 – Number of Households Served

#### **Narrative Information**

N/A

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

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

Outreach to homeless and at-risk residents in Naperville is challenging, because there are relatively few visibly unhoused and unsheltered people. Homelessness prevention and other emergency assistance services are crucial for reducing homelessness both because they provide financial assistance to address immediate rent/mortgage needs and because of the opportunities they present to assess the needs of the individuals and connect them to appropriate services. For this reason, the City partners with CDBG subrecipients DuPage PADS and Loaves & Fishes Community Services in order to reduce and end homelessness in Naperville.

In PY 2002, the City of Naperville allocated \$63,920 in CDBG funds, supplemented by local Social Service Grant funds, to Loaves & Fishes Community Services' Emergency Financial Assistance program. Other programs, including provision of supportive services to individuals in emergency housing were assisted through the City's Social Service Grant. These funded projects provide supportive services designed to prevent future crises and episodes of homelessness. In addition, the City engages and funds social service agencies that provide assistance to very low-income individuals and people who are homeless with food assistance, affordable mental health services and to support unaccompanied youth who are homeless. These agencies routinely conduct individual needs assessments for clients and provide referrals and linkage to other relevant agencies and services.

### Addressing the emergency shelter and transitional housing needs of homeless persons

A total of \$62,698 in PY 2022 CDBG entitlement funds was allocated to Bridge Communities, Inc. for rehabilitation projects at two 8-unit apartment buildings providing transitional housing and social services to formerly homeless households. Bridge Communities also completed a window and door replacement project with PY 2020 funds during the PY 2022 program year and a full upgrade of their IT and web infrastructure at its transitional housing apartments using COVID funding. COVID funding has also assisted 360 Youth Services in operating their Youth Emergency Shelter for young people ages 18-24 who are experiencing homelessness with a total grant of \$98,981.

Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: likely to become homeless after being discharged from publicly funded institutions and systems of care (such as health care facilities, mental health facilities, foster care and other youth facilities, and corrections programs and institutions); and, receiving assistance from public or private agencies that

#### address housing, health, social services, employment, education, or youth needs

The DuPage County Continuum of Care (COC) emphasizes homelessness prevention through the provision of a comprehensive array of services that begin by "preventing homelessness whenever possible" and end with "ensuring every resident has their basic needs of food, clothing and housing met along with achieving their maximum level of self-sufficiency." We continually fund the partners of the DuPage County Continuum of Care, including DuPage PADS, 360 Youth Services, Bridge Communities, Kids Above All, Loaves & Fishes Community Services and Ray Graham Association to ensure a comprehensive community-based approach to ending homelessness in Naperville.

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

In addition to rehabilitation of transitional housing buildings through \$62,698 in funding allocated to Bridge Communities, the City also allocated \$15,745 in CDBG entitlement funds to DuPage PADS to support the provision of on-site wraparound supportive services for formerly chronically homeless individuals living at Olympus Place, a supportive housing complex in Naperville designed to allow formerly chronically homeless individuals to live independently and maintain their housing.

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

### Actions taken to address the needs of public housing

There were no traditional public housing developments located in Naperville during Program Year 2022. The City of Naperville stretches across both DuPage and Will Counties. DuPage County residents are served by the DuPage Housing Authority and Will County residents are served by the Housing Authority of Joliet. The DuPage Housing Authority provides project-based vouchers to residents in some incomerestricted complexes in Naperville, but does not own or operate these buildings.

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

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

#### Actions taken to provide assistance to troubled PHAs

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

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

Actions taken to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment. 91.220 (j); 91.320 (i)

Barriers to affordable housing include a lack of affordable land for new construction, failure to include affordable units in new developments and a lack of complete understanding of how public policies involving land development impact affordable housing. The Naperville City Council adopted the Naperville Land Use Master Plan in March 2022 which includes future land use designation in which affordable housing would be appropriate as a principal use. The plan also recommends pursuit of the following zoning text amendments in an effort to increase affordable units in Naperville: (1) Add residential uses as a supporting land use within commercial zoning districts; (2) Amend the zoning code to add new housing types, such as accessory dwelling units, tiny homes and microunits, and reduce required parking requirements to accommodate higher-density development; and (3) Proposed increases to the maximum residential densities allowed by Zoning Code.

In addition, the Naperville City Council approved the "Addressing Unmet Housing Needs" report recommending and currently achieving milestones on the following goals: (1) Develop a working relationship with affordable housing developers; (2) Develop a strategy to leverage publicly owned land to address housing challenges; (3) Develop a specific plan to preserve naturally occurring affordable housing; (4) Establish additional resources to assist populations with special housing needs; (5) Establish a revolving rehabilitation loan fund targeted towards low-income seniors who currently own in Naperville to make necessary repairs to their home and age in place; (6) Establish a Housing Trust Fund specifically targeted towards helping veterans, seniors, special needs and first responders in purchasing a home; (7) implement an inclusionary zoning ordinance.

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

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

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

Our recent affordable housing studies have increased understanding of the demographic and socioeconomic characteristics of underserved populations in Naperville and their housing and social service needs. Our CDBG and SSG funding priorities specifically address underserved needs through grants to social service providers serving Naperville residents.

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

The City of Naperville experiences relatively few incidents of lead poisoning due to the large volume of newer housing in the City, built after 1978, and effective regulations that address this issue for older housing stock. The Illinois Department of Public Health Childhood Lead Poisoning Prevention Program has primary responsibility for the education and screening activities related to lead hazards. They provide four types of services described below and will continue to provide these services in the City of Naperville.

- (1) Public Information-The Illinois Department of Public Health provides information to the public about the dangers of lead poisoning and how residents can address issues in their own homes. Flyers are provided on request and distributed through the Childhood Lead Prevention Program.
- (2) Testing for Lead Hazards in the Home-Testing is done in cases where a lead hazard is suspected, or when a child's blood level meets the threshold to require the environmental testing.
- (3) Screening for Elevated Blood Levels-Where tests produce evidence of children being exposed to lead hazards, the Illinois Department of Public Health screens children for lead poisoning.
- (4) Counseling-When lead hazards are present or when there are positive tests for lead poisoning, counseling for the family is made available.

Planning to meet the cost of lead-based services is difficult since there are no benchmarks for anticipating the full need or cost of any repair that occurs based on testing or screening. DuPage County and the City of Naperville provide reference materials and/or referrals to residents who believe they may have exposure to lead paint as part of their projects. In PY 2022, there were no projects that required lead paint testing or abatement.

The City has implemented policies to ensure that the CDBG program is in full compliance with reducing lead-based paint hazards. The age of the structures where work will be performed is verified before the project starts. Work on structures built before 1978 requires compliance with regulations and appropriate steps are conducted to remediate the lead paint hazard and follow HUD's Lead Safe Housing Rule.

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

Naperville's poverty rate is 4% (US Census, Quick Facts). Though this rate is less than 5% of the population, it means that more than 6,000 Naperville residents are living in poverty. The City targets its

anti-poverty efforts and funding towards its most vulnerable populations including homeless households, persons at risk of homelessness and individuals who are formerly homeless in need of supportive housing, extremely low-income households and households in crisis. At this time, the long-term impact of the COVID-19 pandemic is still unknown though the City will monitor these effects going forward and make adjustments to our funding priorities accordingly.

In addition to CDBG funding, the City also allocated \$500,000 in Social Service grant funding to agencies serving the community needs identified in the Consolidated Plan. Funded programs are designed to promote self-sufficiency, assist families in crisis and provide resources for underserved groups including senior citizens and persons with disabilities. Actions undertaken in PY 2022 include the allocation of \$63,920 to Loaves & Fishes Community Services for their Emergency Financial Assistance Program providing rent/mortgage and utility assistance to prevent evictions and utility shutoffs. All clients are provided with counseling and referral services to assist in building self-sufficiency, \$62,698 to Bridge Communities for rehabilitation of transitional housing facilities that ensure safe housing and supportive services for families to gain self-sufficiency, and \$15,745 to DuPage PADS to provide wraparound supportive services to formerly chronically homeless individuals and maintain self-sufficiency.

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

The City consults with local housing and social service agencies to eliminate gaps in services, reduce duplication of programs and emphasize efficient service delivery for local, state and federal programs. The City granted \$500,000 to fund social service projects that met the City's funding priorities through the Social Service Grant fund. The fund provides both the City and social service agencies with greater financial flexibility to fund public service projects. The City also regularly allocates the maximum percentage of CDBG funding for services that are allowable from each year's CDBG allocation. The City also participates in the DuPage County HOME Advisory Commission for county-wide affordable housing program planning and execution.

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

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

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

City staff worked with a consultant to develop a new Analysis of Impediments to Fair Housing Choice

which was accepted by the City Council May 2017. The Human Rights & Fair Housing Commission (formerly the Housing Advisory Commission) has implemented recommendations of this study including conducting an annual progress review and setting implementation priorities. The recommendations in the analysis included development of an affordable housing plan. In 2019 the City Council retained the firm of SB Friedman to conduct a housing needs assessment and in 2020, the Council approved the Addressing Unmet Housing Needs report and adopted the Affordable Housing Plan in March 2023.

# CR-40 - Monitoring 91.220 and 91.230

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

All of the City's subrecipients are monitored throughout the program year, though on-site monitoring did not take place in PY 2020 or PY 2021 due to the COVID-19 pandemic. On-site monitoring resumed in PY 2022. Prior to project approval, subrecipients are required to submit documentation demonstrating their capacity to manage and complete the project including completeness of their standard procedures, financial soundness, ability to document compliance with a National Objective, and compliance with the Civil Rights Act, EEO, ADA and other federal laws and regulations.

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

Capital improvement projects are coordinated with the CDBG Administrator to ensure compliance with procurement standards and labor provisions. A pre-construction conference is held with the CDBG Administrator, subrecipient and contractor prior to starting on-site work to explain all applicable labor requirements and to discuss the responsibilities of each party. Each request for payment is reviewed by the CDBG Administrator, Accounts Payable Supervisor and the Director of the Community Services Department/City Clerk.

On-site monitoring visits are conducted with subrecipients following completion of the project. Subrecipients are notified in writing in advance of a visit and are sent a written follow up letter of any findings or recommendations. Monitoring visits focus on completeness of documentation. In addition, ongoing monitoring is maintained with subrecipients, where necessary, to ensure compliance with relocation, acquisition and other long-term requirements aside from construction.

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

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

Naperville's Citizen Participation Plan requires the City to provide citizens, public agencies, and other interested parties with reasonable notice and an opportunity to comment on performance reports. To ensure that citizens, public agencies and other interested parties have reasonable opportunity to examine the Consolidated Annual Performance and Evaluation Report (CAPER), the City takes the following actions upon completion of the draft report: (1) Publish a summary of the performance report as a display advertisement in the Naperville Sun newspaper. This ad describes the performance report and specifies where copies of the full report may be examined, (2) Ensure copies of the report are available at three Naperville Public Library locations, the Community Services Department in City Hall and on the City of Naperville website. Once the report has been made available for public comment, the City allows a 15-day period for citizens, public agencies and interested parties to respond. Comments may be submitted in writing to the CDBG Administrator as well as verbally at a public hearing to be held at the conclusion of the public comment period. A summary of comments is attached to the final performance report.

For Program Year 2022, the public comment period and public hearing notice will be published in the Naperville Sun on Thursday, June 1, 2023 and the public comment period will open. The public hearing on the CAPER will be held at the regularly scheduled City Council meeting at 7:00 PM on June 20, 2023.

# CR-45 - CDBG 91.520(c)

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

The City of Naperville did not change any of its program objectives during PY 2022. The City will continue to implement the Analysis of Impediments to Fair Housing and use the affordable housing preservation strategies recommendation in the Affordable Housing Plan to determine future policy and programmatic objectives.

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

No

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

# CR-45 - CDBG 91.520(c)

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

The City of Naperville did not change any of its program objectives during PY 2022. The City will continue to implement the Analysis of Impediments to Fair Housing and use the affordable housing preservation strategies recommendation in the Affordable Housing Plan to determine future policy and programmatic objectives.

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

No

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

# CR-58 - Section 3

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

Total Labor Hours	CDBG	HOME	ESG	HOPWA	HTF
Total Number of Activities	11	0	0	0	0
Total Labor Hours	0				
Total Section 3 Worker Hours	0				
Total Targeted Section 3 Worker Hours	0				·

Table 8 – Total Labor Hours

Qualitative Efforts - Number of Activities by Program	CDBG	HOME	ESG	HOPWA	HTF
Outreach efforts to generate job applicants who are Public Housing	0				
Targeted Workers	, ,				
Outreach efforts to generate job applicants who are Other Funding	0				
Targeted Workers.					
Direct, on-the job training (including apprenticeships).	0				
Indirect training such as arranging for, contracting for, or paying tuition for, off-site training.	0				
Technical assistance to help Section 3 workers compete for jobs (e.g., resume assistance, coaching).	0				
Outreach efforts to identify and secure bids from Section 3 business concerns.	0				
Technical assistance to help Section 3 business concerns understand and bid on contracts.	0				
Division of contracts into smaller jobs to facilitate participation by Section 3 business concerns.	0				
Provided or connected residents with assistance in seeking employment including: drafting resumes, preparing for interviews, finding job opportunities, connecting residents to job placement services.	0				
Held one or more job fairs.	0				
Provided or connected residents with supportive services that can provide direct services or referrals.	0				
Provided or connected residents with supportive services that provide one or more of the following: work readiness health screenings, interview clothing, uniforms, test fees, transportation.	0				
Assisted residents with finding child care.	0				
Assisted residents to apply for, or attend community college or a four year educational institution.	0				
Assisted residents to apply for, or attend vocational/technical training.	0				
Assisted residents to obtain financial literacy training and/or coaching.	0				
Bonding assistance, guaranties, or other efforts to support viable bids from Section 3 business concerns.	0				
Provided or connected residents with training on computer use or online technologies.	0				
Promoting the use of a business registry designed to create opportunities for disadvantaged and small businesses.	0				
Outreach, engagement, or referrals with the state one-stop system, as designed in Section 121(e)(2) of the Workforce Innovation and Opportunity Act.	0				

Other.	1 0		
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Table 9 – Qualitative Efforts - Number of Activities by Program

#### Narrative

Program Year 2022 activities are listed below:

- 1 Bridge Communities Transitional Housing Rehabilitation
- 2 DuPage PADS Olympus Place Supportive Housing Program
- 3 DuPage PADS Building (Motel) Acquisition for Interim Housing Center
- 4 Illinois Independent Living Center Apartment Acquisition
- 5 Little Friends, Inc. CILA Rehabilitation
- 6 Loaves & Fishes CARES Program Emergency Financial Assistance
- 7 Naperville Elderly Homes Concrete Walkway Replacement/Masonry Work
- 8 Northern Illinois Food Bank Dock Plate Replacement at West Suburban Center
- 9 Ray Graham Association Starling CILA Basement and Bedroom Remodel
- 10 UCP Seguin You Hold the Key Project, Phase IV
- 11 City of Naperville Grant Administration