June 9, 2020 Public Hearing Version

2020 – 2024 Housing and Community Development Consolidated Plan

Lake County Consortium

Lake County, Illinois
North Chicago, Illinois
Waukegan, Illinois

Contents

Executive Summary 1
ES-05 Executive Summary – 24 CFR 91.200(c), 91.220(b) 1
The Process 7
PR-05 Lead & Responsible Agencies - 91.200(b) 7
PR-10 Consultation - 91.100, 91.110, 91.200(b), 91.300(b), 91.215(l) and 91.315(l) 8
PR-15 Citizen Participation - 91.105, 91.115, 91.200(c) and 91.300(c) 30
Needs Assessment 43
NA-05 Overview 43
NA-10 Housing Needs Assessment - 24 CFR 91.405, 24 CFR 91.205 (a,b,c) 44
NA-15 Disproportionately Greater Need: Housing Problems - 91.405, 91.205 (b)(2) 55
NA-20 Disproportionately Greater Need: Severe Housing Problems - 91.405, 91.205 (b)(2) 59
NA-25 Disproportionately Greater Need: Housing Cost Burdens - 91.405, 91.205 (b)(2) 63
NA-30 Disproportionately Greater Need: Discussion - 91.205 (b)(2) 65
NA-35 Public Housing - 91.405, 91.205 (b) 67
NA-40 Homeless Needs Assessment - 91.405, 91.205 (c) 72
NA-45 Non-Homeless Special Needs Assessment - 91.405, 91.205 (b,d) 90
NA-50 Non-Housing Community Development Needs - 91.415, 91.215 (f) 93
Housing Market Analysis 97
MA-05 Overview 97
MA-10 Housing Market Analysis: Number of Housing Units - 91.410, 91.210(a)&(b)(2) 98
MA-15 Housing Market Analysis: Cost of Housing - 91.410, 91.210(a) 102
MA-20 Housing Market Analysis: Condition of Housing - 91.410, 91.210(a) 105
MA-25 Public And Assisted Housing - 91.410, 91.210(b) 109
MA-30 Homeless Facilities and Services - 91.410, 91.210(c) 111
MA-35 Special Needs Facilities and Services - 91.410, 91.210(d) 113

OMB Control No: 2506-0117 (exp. 06/30/2018)

MA-40 Barriers to Affordable Housing - 91.410, 91.210(e) 116

MA-45 Non-Housing Community Development Assets - 91.410, 91.210(f) 119

MA-50 Needs and Market Analysis Discussion 129

MA-60 Broadband Needs of Housing occupied by Low- and Moderate-Income Households - 91.210(a)(4), 91.310(a)(2) 133

MA-65 Hazard Mitigation - 91.210(a)(5), 91.310(a)(3) 136

Strategic Plan 138

SP-05 Overview 138

SP-10 Geographic Priorities - 91.415, 91.215(a)(1) 139

SP-25 Priority Needs - 91.415, 91.215(a)(2) 154

SP-30 Influence of Market Conditions - 91.415, 91.215(b) 162

SP-50 Public Housing Accessibility and Involvement - 91.415, 91.215(c) 178

SP-55 Strategic Plan Barriers to Affordable Housing - 91.415, 91.215(h) 179

SP-60 Homelessness Strategy - 91.415, 91.215(d) 184

SP-65 Lead-based Paint Hazards - 91.415, 91.215(i) 188

SP-70 Anti-Poverty Strategy - 91.415, 91.215(j) 189

SP-80 Monitoring - 91.230 191

Expected Resources 193

AP-15 Expected Resources - 91.420(b), 91.220(c)(1,2) 193

Annual Goals and Objectives 199

AP-35 Projects - 91.420, 91.220(d) 206

AP-38 Project Summary 208

AP-50 Geographic Distribution - 91.420, 91.220(f) 228

Affordable Housing 229

AP-55 Affordable Housing - 91.420, 91.220(g) 229

AP-60 Public Housing - 91.420, 91.220(h) 230

AP-65 Homeless and Other Special Needs Activities - 91.420, 91.220(i) 232

AP-75 Barriers to affordable housing - 91.420, 91.220(j) 235

AP-85 Other Actions - 91.420, 91.220(k) 237

Program Specific Requirements..... 239

AP-90 Program Specific Requirements - 91.420, 91.220(l)(1,2,4) 239

Executive Summary

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

1. Introduction

The intent of this county-wide *Consolidated Plan* is to identify housing and community development needs, goals, outcomes and strategies for Lake County, Illinois. It is also the intent of this document to implement, to the greatest extent possible, the goals of the Lake County Board's *Strategic Plan* --- such as Building Healthy, Inclusive & Resilient Communities and Addressing the Mental Health Crisis through Collaboration. This document serves as a major component toward the official application to the U.S. Department of Housing and Urban Development (HUD) for funding from three current HUD grant programs: Community Development Block Grant (CDBG), HOME Investment Partnership (HOME), and the Emergency Solutions Grant (ESG) Programs for program years 2020 -2024.

Three jurisdictions in Lake County receive Community Development Block Grant (CDBG) funds under the entitlement allocation: Lake County, as an urban county, and the Cities of North Chicago and Waukegan, each as independent entitlements. These three CDBG jurisdictions regularly coordinate with one another and collaborate on planning and implementation of CDBG funded community development activities. The City of North Chicago – while retaining its entitlement status – has opted for its CDBG funding from the U.S. Department of Housing and Urban Development (HUD) – Community Planning and Development Office to be administered by Lake County in accordance with the Lake County Consolidated Plan. The 2018-2020 joint agreement between Lake County and the City of North Chicago provides that North Chicago entitlement-funded activities under the 2020 – 2024 Housing and Community Development Consolidated Plan be pre-approved by the City of North Chicago prior to submission by Lake County to the U.S. Department of Housing and Urban Development. These three units of local government have also formed a HOME Consortium for the purposes of carrying out housing activities funded under the HOME Investment Partnerships Program. Lake County serves as the coordinating unit and Lead Agency for the administration of the Lake County Consortium. Lake County Community Development administers the HOME Program.

Lake County Community Development, in addition to administering HUD's Emergency Solutions Grant (ESG) program, serves as the collaborative applicant for Lake County's Continuum of Care. The Cities of North Chicago and Waukegan collaborate with Lake County on countywide homeless planning and support for homeless service and housing agencies.

To that end and as the following *Consolidated Plan* ---locally titled the "HUD Strategic Plan" ---- states, the highest priority needs continue to be the development of new affordable housing units, the revitalization of commercial districts which will foster economic opportunity and neighborhood stability, as well as general strengthening of low-income neighborhoods through comprehensive revitalization and investment. The graphic below illustrates proposed Goals and funding strategies that address the

OMB Control No: 2506-0117 (exp. 06/30/2018)

four Priority Needs identified in this Plan.

Lake County, IL: Strategic Plan for U.S. Department of Housing & Urban Development ("HUD Strategic Plan")		PRIORITY NEEDS			
		End Homelessness	Inclusive Growth	Housing Accessibility	Borderless Transit
GOALS	1 Improve homeless crisis response system				
	2 Assist People with Special Needs				
	3 Maximize Affordable Housing				
	4 Prioritize Pathways for Upward Economic Mobility				

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

Over the past year, Lake County completed a 2020 update of its comprehensive Analysis of Impediment of Fair Housing Choice ("AI") initially authored in 2014 ---prior to developing the 2015-19 Consolidated Plan focused on affordable housing in high opportunity areas. The 2020 AI Update confirmed similar dynamics: Geographic concentrations of poverty in Lake County coincide with geographic concentrations of several protected classes --- ethnicity, race, nation of origin and disability. Lake County's Housing & Community Development Commission concluded that it is once again of key importance that Lake County aligns investment of HUD funding over the new five-year (2020-24) cycle in ways that overcome impediments to fair housing choice. To continue overcoming impediments to fair housing choice, Lake County must invest its HUD funding in ways that both revitalize depressed communities and increases access for protected classes to quality housing and good jobs.

The ON TO 2050 long-range plan by Chicago Metropolitan Agency for Planning (CMAP) states that economic growth for the region requires growth to include areas and people who have been excluded from growth in the past: People with significant housing barriers are less likely to contribute to the economy. CMAP's ON TO 2050 plan highlights the principles of Inclusive Growth, Prioritized Investment and Resilience ---all of which are also themes of this Plan.

Priority Community Needs & Resulting HUD Strategic Plan Goals

3. Evaluation of past performance

OMB Control No: 2506-0117 (exp. 06/30/2018)

In each five-year plan, HUD provides the opportunity to address priority needs as defined by the community. In 2015-19, Lake County adopted HUD's three performance objectives – create suitable living environments, affordable housing and economic opportunity – as priority needs. Progress was moderate toward meeting these three needs, so ongoing work is required. In 2020-24, Lake County localized HUD's three performance objectives further to focus on four PRIORITY NEEDS identified in this Consolidated Plan:

- Ending Homelessness;
- Inclusive Growth;
- Housing Accessibility; and
- Borderless Transit (to increase access to jobs by low/Mod Residents & People w/Disabilities)[1]

These four priority needs are inter-related, multi-faceted and community-wide. Addressing these needs requires extensive public-private collaboration and retooling of existing systems. For example, former industrial areas of Lake County have aged housing stock that is affordable but was built without accessible features for people with disabilities and with schools hindered by low revenues from a declining tax base. Jobs in these areas have declined without a commensurate rise in public transit infrastructure to provide access to jobs elsewhere in the county.

The 2015-19 Consolidated Plan successfully targeted investment in affordable housing, economic development for low/moderate income workers and assistance for people with disabilities. These previous goals should be pursued with even greater focus:

- Assist People with Special Needs (e.g. **persons with disabilities, persons with HIV/AIDS, elderly persons, frail elderly persons, persons with alcohol and/ or drug addictions, victims of domestic violence and public housing residents**---as defined by HUD)
- Maximize Affordable Housing
- Prioritize Pathways for Economic Mobility

In addition, absolute focus is needed to finish Lake County's work on ending homelessness. During the past five years, Lake County and its HUD Continuum of Care, the Lake County Coalition for the Homeless, joined the Built for Zero national collaboration to end homelessness. Built for Zero provided extensive technical assistance and peer consultation that assisted in the establishment of Lake County's coordinated entry process and high-quality "by-name" list. Using data and actual client contact in a coordinated "entry" into the homeless services system, Lake County's homeless service providers are able to prioritize scarce housing resources for homeless people and families with the most critical needs. In 2020, Lake County was among the first ten communities in the United States to end veteran homelessness, after which it set its sights on ending chronic homelessness --- life-threatening condition --- as soon as possible. To now end chronic homelessness and then to end youth & family homelessness, this Plan clearly states and uplifts the goal to Improve the Homeless Crisis Response System in Lake County and more quickly move people who are homeless into housing.

OMB Control No: 2506-0117 (exp. 06/30/2018)

4. Summary of citizen participation process and consultation process

Lake County staff engaged numerous municipalities, agencies and associations in consultation on this Plan. Throughout these discussions, transportation and housing for clients and residents remained a focus. The Coalition for the Homeless and Lake County engaged CSH (formerly the Corporation for Supportive Housing) to perform a Gaps Analysis of the Homeless Crisis Response System in order to best assess ways to end chronic homelessness ASAP and then to end family and youth homelessness. Both agencies and clients were interviewed and surveyed as part of CSH's Gap Analysis project in the context of this Plan.

In response to Lake County's request for local technical assistance, the Chicago Metropolitan Agency for Planning (CMAP) provided feedback on this Plan at the HCDC's July 2019 meeting and according to CMAP, this HUD Strategic Plan is in alignment with Chicago's regional plan, On To 2050, authored by CMAP. In response to the June 2019 draft of this HUD Strategic Plan, CMAP reflected that a) “Resilience is often framed in terms of the environment, but ON TO 2050 takes a broader frame – resilience is about preparing for known and unknown challenges. People don’t plan to be homeless or to need emergency shelter. But having systems, programs and facilities in place to help address homelessness when the unknown, unplanned challenge arises for an individual or family is a critical part of creating a resilient Lake County; and b) Inclusive growth means investing in disinvesting areas and expanding opportunity…People experiencing homelessness or housing crises experience barriers to participating in the economy, often times having trouble keeping existing jobs or obtaining employment. Providing emergency shelter, the rapid rehousing initiative, and working to prevent homelessness helps include and keep individuals in a position where they can benefit from a growing economy; and c) the County is Prioritizing Investment where it most effective and can have the biggest impact according to a Gap Analysis of the Homeless Crisis Response system. Also, by allowing partner agencies that administer proven housing progress to apply just once in this five-year period is an efficiency gain and streamlines government, aligns nicely with the plan, and helps prioritize investment in programs that have been shown to work.”

5. Summary of public comments

As part of the citizen participation process, Lake County collaborated with the Lake County Coalition for the Homeless (LCCH) and Corporation for Supportive Housing (CSH) to conduct a thorough Gaps Analysis of the Homeless Crisis Response System. The Gaps Analysis process included multiple citizen participation activities, including: interviews with key stakeholders, a Survey of Homeless Needs distributed among residents and service providers, a Housing Placement Satisfaction Survey distributed to homeless services clients, and a Coordinated Entry Survey distributed to clients who had been housed through the Coordinated Entry process. This input was incorporated into a comprehensive Gaps Analysis of the Homeless Crisis Response System report, published June 2019, which identified 15 gaps and provided recommendations of how to address these needs of Lake County residents experiencing homelessness. The gaps which fit into three main categories: Initial Crisis Response (Points of Entry),

OMB Control No: 2506-0117 (exp. 06/30/2018)

Housing Interventions, and Administrative Improvements. These recommendations subsequently impacted the goal-setting process by helping Lake County to identify goals and priority needs.

In support of this Plan's second goal, to Assist People with Special Needs, CMAP observed that "accessibility improvements and rental assistance both support goals of inclusive growth" while also benefitting people with disabilities who "have double the unemployment rate as residents without disabilities, and a significant number of people with disabilities cite lack of transportation as a barrier to employment This is compounded for people with disabilities who live in economically disinvested areas (EDAs)." Goal #2 also supports improvements in transportation and housing strategy of building new accessible units, improving existing homes and locating housing in walkable neighborhoods where amenities are accessible for residents with disabilities and seniors.

This HUD Strategic Plan's third goal, maximize affordable housing, matches CMAP's recommendation to "create accessible housing" to remedy the "lack of sufficient housing options" which "makes our residential market vulnerable to shifting demand, helps reduce concentrated poverty, and improve affordability and accessibility for all residents."

CMAP's plan stressed that growing the regional economy inclusively will require leveraging the transportation system to better connect residents – particularly minority and low-income residents – to jobs and other amenities. Transportation improvements is a focal point of this HUD Strategic Plan's fourth goal, Create Pathways for Upward Economic Mobility. This can include improved transit from low- and moderate-income communities to the County's job corridors, microlending to minority businesses, and CDBG investment---as permitted by HUD---in economic development projects for the revitalization of low- and moderate-income business districts.

Additional public comments and survey results are provided as an appendix to this document.

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

All comments received to date were accepted.

7. Summary

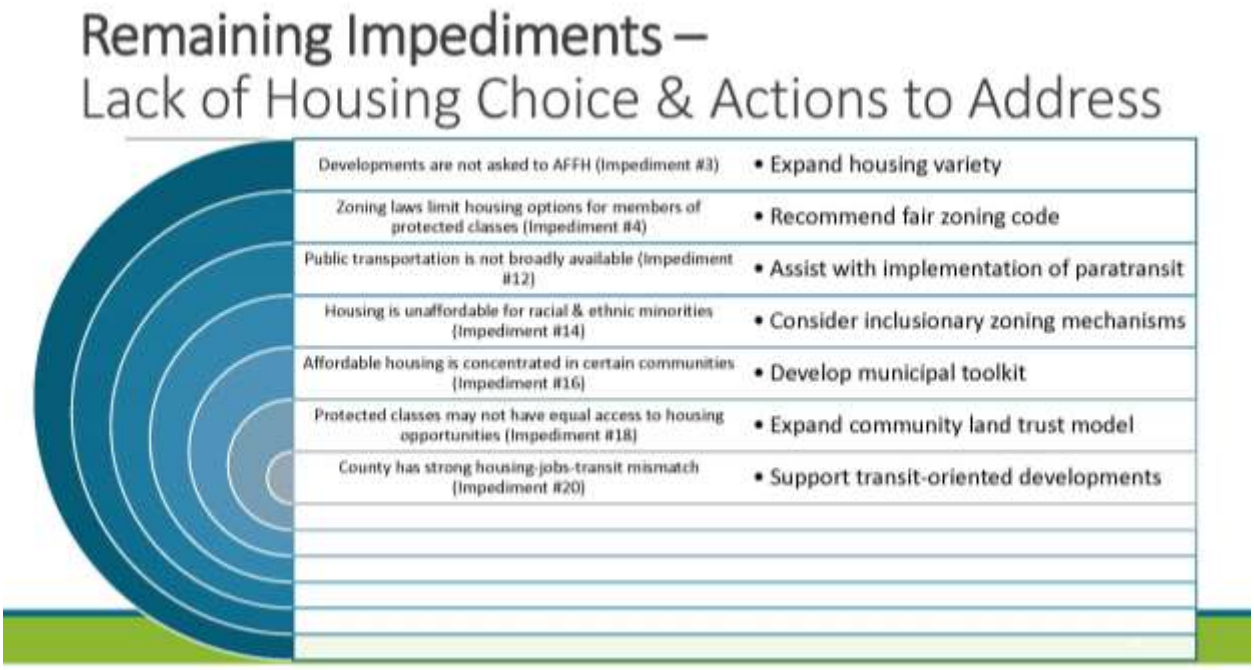
The foundation of this HUD Strategic Plan has been stakeholder engagement and community input supported by timely plans and studies recently authored by the Chicago Metropolitan Agency for Planning (CMAP) and the Corporation for Supportive Housing (CSH), the key findings of which are reinforced and reflected in Lake County's Analysis of Impediments to Fair Housing Choice. In its regional plan, CMAP headlines "Prioritized Investment" to "carefully target public resources to maximize regional benefits for mobility, the economic and quality of life for all residents". CSH's gap analysis of Lake County's Homeless Crisis Response System reveals key problems to fix. Overcoming the remaining impediments to Fair Housing Choice identified in Lake County's recent update were used by Lake County to formulate the goals, needs and funding strategies for HUD funding over the 2020-24

OMB Control No: 2506-0117 (exp. 06/30/2018)

timeframe. These specific impediments and high-level strategies to address them are summarized in the graphic below.

The goals and priority needs identified in this HUD Strategic Plan represent some of our community's most difficult problems to solve. Addressing these problems requires new partners, new agency capacity and new project sites that can come together over the next five years to achieve these goals. As the most impactful community development and affordable housing activities often involve a very lengthy project timeline, Lake County approached this Plan by inviting larger strategic, multi-staged projects that could result in the creation of the new development or service to fill housing and community development gaps in Lake County.

The HUD Strategic Plan continues to build on identified strategies to address impediments to fair housing choice in Lake County. The development strategies, named in the graphic below, will be strategies in the coming five years. Lake County will fund and support projects that align with these actions.



Development-Related Impediments to Fair Housing Choice in Lake County

OMB Control No: 2506-0117 (exp. 06/30/2018)

The Process

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

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

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

Agency Role	Name	Department/Agency
CDBG Administrator	LAKE COUNTY	Community Development
HOME Administrator	LAKE COUNTY	Community Development
ESG Administrator	LAKE COUNTY	Community Development

Table 1 – Responsible Agencies

Narrative

Lake County government was aided by Corporation for Supportive Housing (CSH) in preparing the homeless needs assessment portions of the Consolidated Plan. CSH's work was performed in cooperation with the Lake County Coalition for the Homeless---the Lake County Continuum of Care (CoC). Lake County submitted an application for Local Technical Assistance to the Chicago Metropolitan Agency for Planning (CMAP) asking for assistance developing its consolidated plan, considering the plan's alignment with CMAP's ON TO 2050, and help with community outreach. CMAP agreed to both familiarize the Housing & Community Development Commission with the content of the regional ON TO 2050 Plan and review for key stakeholders the Consolidated Plan's alignment with ON TO 2050.

Consolidated Plan Public Contact Information

BRENDA O'CONNELL

boconnell@lakecountyil.gov

847-377-2331

OMB Control No: 2506-0117 (exp. 06/30/2018)

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

1. Introduction

The Lake County Housing & Community Development Commission (HCDC) meets monthly to discuss community needs and priorities for funding from the U.S. Department of Housing & Urban Development (HUD). Public hearings are held at nearly every meeting for public and agency feedback on HCDC discussions, funding recommendations and action plans.

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

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

Coordination with Private and Governmental Health, Mental Health, and Service Agencies

In addition to the extensive collaboration between Lake County Community Development and the Lake County Coalition for the Homeless (see below), Lake County Community Development participates in various groups to ensure that the county plays a role in the efforts of community partners to improve services for Lake County's residents. Lake County Community Development staff participate in meetings of the regular governmental and non-governmental health and service agency groups, such as the Lake County Alliance for Human Services, Lake County Coordinated Transportation Services Committee, Live Well Lake County and the Mental Health Coalition among other committees. Staff also participate in events such as the full-day visioning workshop for a Lake County Crisis Care Model. Lastly, as a funder of many service agencies, Lake County maintains relationships and communication with agencies throughout the year including in-person monitoring of every funded service program annually.

Coordination with Housing Authorities

The Public Housing Agencies (PHAs) are required to submit Certificates of Consistency with the Consolidated Plan to Lake County for review prior to submitting PHA Annual Plans or 5-year plans. Likewise, Lake County consults with each PHA during the consultation and writing of the 5-Year Consolidated Plan. In addition to these regular communications, special projects often require collaboration between the PHAs and the County. Public Housing Agencies are eligible to apply for CDBG and HOME funding during the annual application round conducted by Lake County Community Development.

OMB Control No: 2506-0117 (exp. 06/30/2018)

Lake County has also partnered with the Lake County Coalition for the Homeless (LCCH) to assist both Lake County Housing Authority (LCHA) and Waukegan Housing Authority (WHA) to apply for additional Housing Choice Vouchers from the U.S. Department of Housing and Urban Development. This partnership resulted in a successful award of additional special-purpose Housing Choice Vouchers, known as Mainstream Vouchers, to both PHAs. The partnership also expanded coordination among the agencies for the purposes of administering the vouchers. The majority of the new Mainstream Vouchers are coordinated with LCCH's coordinated entry process to serve the clients currently in the homeless service system. Additionally, LCHA has become a member of the ServicePoint Referral Network, a network of public, governmental, and nonprofit Lake County service providers that are able to send and receive electronic referrals for the purposes of enhanced coordination among providers.

Coordination with Other Assisted Housing Providers

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

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

Community Development staffs the Continuum of Care, so substantial overlap of efforts and coordination do take place. Particular meetings at which content of this Plan were discussed are included in Table 2 below.

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

As part of the citizen participation process, Lake County collaborated with the Lake County Coalition for the Homeless (LCCH) and Corporation for Supportive Housing (CSH) to conduct a thorough Gaps Analysis of the Homeless Crisis Response System. The Gaps Analysis process included multiple citizen participation activities, including: interviews with key stakeholders, a Survey of Homeless Needs

OMB Control No: 2506-0117 (exp. 06/30/2018)

distributed among residents and service providers, a Housing Placement Satisfaction Survey distributed to homeless services clients, and a Coordinated Entry Survey distributed to clients who had been housed through the Coordinated Entry process. This input was incorporated into a comprehensive Gaps Analysis of the Homeless Crisis Response System report, published June 2019, which identified 15 gaps and provided recommendations of how to address these needs of Lake County residents experiencing homelessness. The gaps which fit into three main categories: Initial Crisis Response (Points of Entry), Housing Interventions, and Administrative Improvements. These recommendations subsequently impacted the goal-setting process by helping Lake County to identify goals and priority needs.

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

The Continuum of Care and Lake County Community Development most recently jointly updated ESG Policies and Procedures locally in the first quarter of 2019 and then again in response to the Coronavirus pandemic. The agreed-upon change was to lengthen the timing for permitted rental assistance in ESG-funded Rapid Rehousing programs. The change allows for an extension of assistance on a month-by-month basis up to 24 months in cases where there was an emergency loss of income.

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

OMB Control No: 2506-0117 (exp. 06/30/2018)

Table 2 – Agencies, groups, organizations who participated

1	**Agency/Group/Organization**	Lake County Coordinated Transportation Services Committee
	Agency/Group/Organization Type	Services-Elderly Persons Services-Persons with Disabilities Services-Health Services-Employment Other government - County Other government - Local Civic Leaders
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy Non-Homeless Special Needs Economic Development Anti-poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Community Development staff met with Division of Transportation staff about its draft Paratransit Market Study for the Lake County Region. Areas of improved coordination include partnering together to request support from the Rapid Transit Authority (RTA) to link transportation pulse points and availability to housing.
2	**Agency/Group/Organization**	City of Zion
	Agency/Group/Organization Type	Other government - Local
	What section of the Plan was addressed by Consultation?	Economic Development
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Community Development staff met with City of Zion staff to discuss the economic development and non-housing community development needs of the City. It is anticipated that the City will continue to engage Lake County Community develop to assist in the implementation the economic development strategies outlined in their 2016 Comprehensive Plan; pursue lakefront development, participate in Great Lakes Circle Tour. revitalize downtown and promote development of the Route 173 Corridor.
3	**Agency/Group/Organization**	WAUKEGAN HOUSING AUTHORITY
	Agency/Group/Organization Type	PHA

OMB Control No: 2506-0117 (exp. 06/30/2018)

	What section of the Plan was addressed by Consultation?	Public Housing Needs
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Community Development staff met with Waukegan Housing Authority staff to discuss the potential to collaborate on projects where the goals of the WHA and the goals of the 5-Year Consolidated Plan overlap. The anticipated outcome of this consultation is an increase in rental assistance resources available to low-income Lake County residents with disabilities, improved access to services, and improved coordination between the Waukegan Housing Authority, the Lake County Coalition for the Homeless, and Lake County Community Development.
4	**Agency/Group/Organization**	North Chicago Housing Authority
	Agency/Group/Organization Type	PHA
	What section of the Plan was addressed by Consultation?	Public Housing Needs
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Community Development staff met with North Chicago Housing Authority staff to discuss the potential to collaborate on projects where the goals of the NCHA and the goals of the 5-Year Consolidated Plan overlap. The anticipated outcome of this consultation is improved coordination between the North Chicago Housing Authority, the Lake County Coalition for the Homeless, and Lake County Community Development, which will improve the outcomes of existing programs.
5	**Agency/Group/Organization**	Lake County Workforce Development
	Agency/Group/Organization Type	Services-Employment
	What section of the Plan was addressed by Consultation?	Economic Development Anti-poverty Strategy

OMB Control No: 2506-0117 (exp. 06/30/2018)

	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	An in-person consultation was held between the Workforce Development Director, key staff of the organization and Lake County Community Development. Ideas for future collaborations were discussed that will be considered in the future including creating transportation subsidies for homeless individuals seeking employment resources and continued transit assistance to those households until they are self-sufficient in this regard. Additionally, a grant seeking partnership between the Homeless Coalition and Workforce Development was discussed wherein homelessness and workforce issues could be addressed in partnership.
6	**Agency/Group/Organization**	LAKE COUNTY HEALTH DEPARTMENT
	Agency/Group/Organization Type	Services - Housing Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Persons with HIV/AIDS Services-Victims of Domestic Violence Services-homeless Services-Health Health Agency Other government - County Grantee Department
	What section of the Plan was addressed by Consultation?	Lead-based Paint Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The Lake County Health Department (LCHD) was consulted on the existing programs for lead poisoning in Lake County. The LCHD provided data on the number of cases investigated and the trends they interpret from the data. Potential outcomes included an improved coordinated effort to target the areas where cases are most common.
7	**Agency/Group/Organization**	Lessons in Care
	Agency/Group/Organization Type	Services-Elderly Persons
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Non-Homeless Special Needs

OMB Control No: 2506-0117 (exp. 06/30/2018)

	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The Executive Director of Lessons in Care visited for a one hour in-person meeting to discuss the needs of the growing senior citizen population in Lake County. Needs such as resources for caregivers, housing and a central 'clearinghouse' for senior issues were a focus of the conversation.
8	**Agency/Group/Organization**	WARREN TOWNSHIP
	Agency/Group/Organization Type	Services-Children Services-Elderly Persons Other government - Local Civic Leaders
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy Homeless Needs - Families with children Economic Development Anti-poverty Strategy

OMB Control No: 2506-0117 (exp. 06/30/2018)

	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The Warren Township Supervisor was consulted via small group meeting between a local affordable housing developer and Lake County's Community Development Administrator--- on March 5, 2019. The need for affordable housing in the Gurnee/Warren Township area surpasses supply. Warren Township frequently receives calls asking for rental assistance. For families in existing rental housing stock, there is a need for financial counseling; the Township is often approached for emergency financial assistance to pay rent after families incurred a discretionary expense such as a vacation and/or holiday presents. The Township uses emergency/general assistance dollars to pay critical bills on behalf of employed residents. In terms of housing needs, the Gurnee area still needs more senior housing after seven new assisted living centers have been recently built including local examples of assisted living centers with long waiting lists and several cases of seniors trying to stay with family members who found that situation unsustainable. Due to the large numbers of seniors in the area, Warren Township has constructed a bond-financed $6 million addition to its Senior Center. Among younger families, township clients have reported quitting their jobs due to lack of childcare.
9	**Agency/Group/Organization**	The Alliance for Human Services in Lake County
	Agency/Group/Organization Type	Services - Housing Services-Children Services-Elderly Persons Services-Persons with Disabilities Regional organization Civic Leaders
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Non-Homeless Special Needs Anti-poverty Strategy

OMB Control No: 2506-0117 (exp. 06/30/2018)

	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	At a convening of non-profit Executive Directors by the Lake County Alliance for Human Services, Lake County Community Development held an informal focus group on the service needs to be addressed in the County's 2020-24 HUD Strategic Plan. There was substantial interest in coordination of services by United Way 211 and the ServicePoint Referral Network. Lack of transportation was mentioned as a barrier to both services and jobs.
10	**Agency/Group/Organization**	Lake County Municipal League
	Agency/Group/Organization Type	Housing Other government - County Other government - Local Civic Leaders
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Economic Development
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Lake County Community Development consulted with the Lake County Municipal League (LCML) via telephone on 4/24/19. The topics discussed included the potential role for the Lake County Land Bank Authority (LCLBA) in the 2020-2024 HUD Strategic Plan. It was noted that affordable housing is a natural byproduct of Land Banking activities and that the LCLBA can serve as a redevelopment tool for many of Lake County's vacant and/or distressed properties.
11	**Agency/Group/Organization**	ANTIOCH TOWNSHIP
	Agency/Group/Organization Type	Other government - Local
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Non-Homeless Special Needs Market Analysis Anti-poverty Strategy

OMB Control No: 2506-0117 (exp. 06/30/2018)

	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	An in-person meeting was conducted with Antioch, Libertyville, Lake Villa and Wauconda townships. Input on future needs provided including Senior services, behavioral health and transportation. Future collaboration on shared goals could result. Townships would like improved coordination of transportation services as well as improved coordination of social services provided by the townships and elsewhere.
12	**Agency/Group/Organization**	Libertyville Township
	Agency/Group/Organization Type	Other government - Local
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Non-Homeless Special Needs Market Analysis Anti-poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	An in-person meeting was conducted with Antioch, Libertyville, Lake Villa and Wauconda townships. Input on future needs provided including Senior services, behavioral health and transportation. Future collaboration on shared goals could result. Townships would like improved coordination of transportation services as well as improved coordination of social services provided by the townships and elsewhere.
13	**Agency/Group/Organization**	Wauconda Township
	Agency/Group/Organization Type	Other government - Local

OMB Control No: 2506-0117 (exp. 06/30/2018)

	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Non-Homeless Special Needs Market Analysis Anti-poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	An in-person meeting was conducted with Antioch, Libertyville, Lake Villa and Wauconda townships. Input on future needs provided including Senior services, behavioral health and transportation. Future collaboration on shared goals could result. Townships would like improved coordination of transportation services as well as improved coordination of social services provided by the townships and elsewhere.
14	**Agency/Group/Organization**	LAKE VILLA TOWNSHIP
	Agency/Group/Organization Type	Other government - Local
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Non-Homeless Special Needs Market Analysis Anti-poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	An in-person meeting was conducted with Antioch, Libertyville, Lake Villa and Wauconda townships. Input on future needs provided including Senior services, behavioral health and transportation. Future collaboration on shared goals could result. Townships would like improved coordination of transportation services as well as improved coordination of social services provided by the townships and elsewhere.

OMB Control No: 2506-0117 (exp. 06/30/2018)

15	**Agency/Group/Organization**	Lake County Coalition for the Homeless
	Agency/Group/Organization Type	Services - Housing Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Persons with HIV/AIDS Services-Victims of Domestic Violence Services-homeless
	What section of the Plan was addressed by Consultation?	Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	At an in-person meeting of the Youth Homelessness Work Group of the Lake County Coalition for the Homeless, attendees were asked for opinions regarding the Consolidated Plan and encouraged to distribute and respond to a survey that would be incorporated into the plan. Attendees were also encouraged to attend future meetings where they could express input, such as the Housing and Community Development Commission meetings. This consultation is expected to result in increased input through the survey and improved coordination of services by youth service agencies and the County. At an in-person meeting of the Strategic Planning and System Performance Committee of the Lake County Coalition for the Homeless, member agency staff were asked for input on the homeless needs Gaps Analysis. The outcome of this consultation will be incorporated into the Gaps Analysis and Consolidated Plan for the purposes of improving coordination of homeless services.
16	**Agency/Group/Organization**	Illinois Department of Children and Family Services
	Agency/Group/Organization Type	Child Welfare Agency
	What section of the Plan was addressed by Consultation?	Public Housing Needs Homelessness Needs - Unaccompanied youth

OMB Control No: 2506-0117 (exp. 06/30/2018)

	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Community Development staff met with a staff member from the Illinois Department of Children and Family Services. This consultation is part of ongoing communication and collaboration improvement with the IDCFS. IDCFS staff indicated that the number of investigations and the number of youth in care has increased, as have the number of families who are homeless and children who are aging out of care. The staff member also indicated a need for Lake County residents to be more aware of the role IDCFS has in the community.
17	**Agency/Group/Organization**	Lake County Division of Transportation
	Agency/Group/Organization Type	Other government - County
	What section of the Plan was addressed by Consultation?	Homelessness Strategy Non-Homeless Special Needs Economic Development Market Analysis Anti-poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Representatives of the Lake County Division of Transportation met on multiple occasions with Community Development to discuss the County's needs as they relate to transportation and future planning. Plans to have consulting group work hand-in-hand with County decision makers to use CDBG-PS funding to improve transit in Lake County for low/mod income households was discussed. Work in this regard would be done in concert with recent a recent transit study completed for the County.
18	**Agency/Group/Organization**	Senior Services Coalition of Lake County
	Agency/Group/Organization Type	Regional organization
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Non-Homeless Special Needs

OMB Control No: 2506-0117 (exp. 06/30/2018)

	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Community Development attended a regular meeting of the SSCLC to gather input on the consolidated plan and their perspective on priorities for the County. Housing options were a main point of focus for the SSCLC. There are gaps in senior service housing options, in particular for those suffering from serious mental illness and others who could benefit from "supportive living" intermediate skill residences, that could be ameliorated by an infusion of County resources. Services to help seniors with paying bills and other supports to allow seniors to age in place were identified as potential spending targets.
19	**Agency/Group/Organization**	NORTH CHICAGO
	Agency/Group/Organization Type	Other government - Local
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Economic Development
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	City staff attended the needs assessment public hearing in April 2019. In addition, multiple one-on-one meetings were held to discuss the City's priority needs and how they could be addressed. The City expressed the needs for funding capital projects including bolstering their aging infrastructure.
20	**Agency/Group/Organization**	Village of Fox Lake
	Agency/Group/Organization Type	Other government - Local
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Economic Development Non-housing community development
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Village staff attended the needs assessment public meeting in February 2019. In addition, one-on-one discussions were held to discuss the Village's priority needs and how they could be addressed. The Village expressed the desire to invest in their downtown business district and was interested in technical assistance for local small business owners.
21	**Agency/Group/Organization**	Village of Round Lake Beach
	Agency/Group/Organization Type	Other government - Local

OMB Control No: 2506-0117 (exp. 06/30/2018)

	What section of the Plan was addressed by Consultation?	Economic Development Non-housing community development
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Village staff attended the needs assessment public meeting in February 2019. In addition, discussions were held to discuss the Village's priority needs and how they could be addressed. The Village expressed their need for continued improvements to their aging infrastructure system and flood prevention measures for homeowners.
22	**Agency/Group/Organization**	Community Youth Network
	Agency/Group/Organization Type	Services - Housing Services-Children
	What section of the Plan was addressed by Consultation?	Homelessness Needs - Unaccompanied youth
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Community Development staff met with Community Youth Network to discuss their priorities and plans for growth. The CYN staff indicated that the organization is interested in expanding and partnering with other youth organizations to better serve youth who need counseling, after school enrichment, and housing. The consultation is expected to improve coordination for services for Lake County youth.
23	**Agency/Group/Organization**	Mano a Mano Family Resource Center
	Agency/Group/Organization Type	Services-Health Services-Education Services-Employment
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs Economic Development Anti-poverty Strategy

OMB Control No: 2506-0117 (exp. 06/30/2018)

	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Mano a Mano representatives provided their input on what they felt Community Development should prioritize in the future in a face-to-face meeting. The growing foreign born and Spanish speaking population in Lake County could benefit from County spending to improve job readiness according to Mano a Mano representatives. Computer skills training, quality childcare and supports for citizenship assistance were also identified as important focusses for funding consideration by the MaM staff.
24	**Agency/Group/Organization**	Highland Park Community Nursery School & Day Care Center
	Agency/Group/Organization Type	Services-Children Services-Education Services-Employment
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs Economic Development Anti-poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The Highland Park ED met face-to-face with Community Development representatives to express her organization's concerns for the future and what priorities CD should consider for future planning. The organization has seen an increasing need for subsidized childcare for low/mod income households. As there is increasing need the pre-school suggests that increasing resources to offset the costs not covered elsewhere would ease the burdon on these low/mod income households and allow them to support their family via employment.
25	**Agency/Group/Organization**	Center for Enriched Living
	Agency/Group/Organization Type	Services-Elderly Persons Services-Persons with Disabilities Services-Employment
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs Economic Development

OMB Control No: 2506-0117 (exp. 06/30/2018)

	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Representatives from the Center for Enriched Living met face-to-face with Lake County representatives to express their opinion on what the spending priorities for Community Development should be in the upcoming consolidated plan. Investments in employment services for intellectually disabled Lake County residents was identified as a key potential focus for County investment. The dollars supporting these individuals result in lifelong results for those served because they are able to gain employment skills, not taught elsewhere, that result in jobs that provide satisfaction to both the employee and employer when executed well. Without investment, fewer employable people will find work.
26	**Agency/Group/Organization**	Great Lakes Adaptive Sports Association
	Agency/Group/Organization Type	Services-Persons with Disabilities
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Representatives from GLASA met with Lake County representatives to discuss, face-to-face, the priorities they believe the County should include in their upcoming consolidated plan. GLASA staff proposed further investment in disability services such as those provided by GLASA. If service dollars were not possible, then capital investments in equipment would be helpful to the organization.
27	**Agency/Group/Organization**	Erie Family Health Center Inc.
	Agency/Group/Organization Type	Services-Health
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs Anti-poverty Strategy

OMB Control No: 2506-0117 (exp. 06/30/2018)

	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Representatives from Erie's Waukegan facility met face-to-face with Lake County representatives to discuss their organization's future and the needs they see in the Community. Their numbers are growing and they suggested that continued investment in their behavioral health services will support the growth they're seeing. They have become an efficient provider of counseling and psychiatric services for low/mod income households which is not the case County-wide. Investment in their programs could result in better health outcomes for Lake County's low/mod income residents.
28	**Agency/Group/Organization**	CITY OF WAUKEGAN
	Agency/Group/Organization Type	Housing PHA Other government - Local Civic Leaders
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Community Development participated in a conference call with the Mayor of the City of Waukegan, the Director of CDBG Programs and the Executive Director of the Waukegan Housing Authority. The Mayor asked for Lake County HOME and CDBG dollars to be co-invested with Waukegan HOME and CDBG investment over the coming years in the redevelopment of Barwell Manor ---currently a Waukegan public housing authority site. The buildings and the areas need investment, revitalization and better housing choices.
29	**Agency/Group/Organization**	PRAIRIE STATE LEGAL SERVICE
	Agency/Group/Organization Type	Services - Housing Services-Victims of Domestic Violence Service-Fair Housing Services - Victims

OMB Control No: 2506-0117 (exp. 06/30/2018)

	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Non-Homeless Special Needs
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Prairie State Legal Services (PSLS) was interviewed by CSH for the stakeholder interview portion of the homeless needs gap analysis. PSLS shared with CSH that it assists with any civil legal problem- DV/family law, housing law but does not handle criminal or traffic law. The most common case at PSLS is housing-related, especially eviction-related legal services.
30	**Agency/Group/Organization**	LAKE COUNTY SHERIFF'S ADULT
	Agency/Group/Organization Type	Publicly Funded Institution/System of Care Other government - County
	What section of the Plan was addressed by Consultation?	Homelessness Strategy Homeless Needs - Chronically homeless Non-Homeless Special Needs
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Outreach staff of the Lake County Sheriff's Office was interviewed by the CSH team for the homeless needs gap analysis. Staff reported that Lake County is working on a crisis center and is assessing sites for the crisis center. Deputies are seeing more people who are homeless in mostly the north part of the county. Homelessness is present but more hidden in the southern half of Lake County.
31	**Agency/Group/Organization**	Fremont Township
	Agency/Group/Organization Type	Services - Housing Services-Persons with Disabilities Services-homeless Civic Leaders
	What section of the Plan was addressed by Consultation?	Homelessness Strategy Homeless Needs - Families with children

OMB Control No: 2506-0117 (exp. 06/30/2018)

	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The Fremont Township Supervisor and Case Manager were interviewed by CSH for the homeless needs gap analysis. They reported a lack of availability of housing and services for people in their township who are homeless. Emergency support services are lacking, including lack of case management services. Referrals to the homeless service system are a challenge.
32	**Agency/Group/Organization**	WAUKEGAN TOWNSHIP
	Agency/Group/Organization Type	Services - Housing Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Persons with HIV/AIDS Services-homeless Services-Employment Other government - Local Civic Leaders
	What section of the Plan was addressed by Consultation?	Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The primary case manager of Waukegan Township was interviewed by CSH as a key stakeholder for the homeless needs gap analysis. Waukegan Township manages both Eddie Washington and Staben House shelters. The Case Manager reported that Day Centers for people who are homeless are lacking. Once PADS closes for the day, there is nothing offered until that night when PADS opens again. As a result, people who are homeless congregate at McDonalds or libraries.
33	**Agency/Group/Organization**	LAKE COUNTY HOUSING AUTHORITY
	Agency/Group/Organization Type	PHA

OMB Control No: 2506-0117 (exp. 06/30/2018)

	What section of the Plan was addressed by Consultation?	Public Housing Needs Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Community Development staff met with Lake County Housing Authority staff to discuss the potential to collaborate on projects where the goals of the LCHA and the goals of the 5-Year Consolidated Plan overlap. The anticipated outcome of this consultation is an increase in rental assistance resources available to low-income Lake County residents with disabilities, improved access to services, and improved coordination between the Lake County Housing Authority, the Lake County Coalition for the Homeless, and Lake County Community Development.

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

For-profit companies were not consulted as they are the jurisdiction of Lake County Partners, a staff member of which represents Lake County Partners and its members' interests.

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

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Continuum of Care	Lake County Coalition for the Homeless	In support of both the Continuum of Care and this Strategic Plan, Lake County Community Development hired Corporation for Supportive Housing (CSH) to analyze gaps in Lake County's homeless services and crisis response system. The goals and recommendations of the CSH Gap Analysis overlap substantially with the goals of this Strategic Plan.

OMB Control No: 2506-0117 (exp. 06/30/2018)

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Paratransit Market Study	Division of Transportation	The study looks at the strengths and weaknesses of the transportation system in Lake County. Transportation issues have a direct impact on employment, housing, social services, recreation and most other activities of daily living for Lake County residents. Our goals for improving Lake County must include transportation considerations as it is the means of access for most activities.
Healthcare Access in Northern Lake County	Healthcare Foundation of Northern Lake County	This study looks at healthcare and access issues that impact residents living in Northern Lake County which is the same region most of the investment in social services is required. The people discussed in this study are the same as those Community Developments plan will seek to affect.
On to 2050	Chicago Metropolitan Agency for Planning	The regional comprehensive plan "On to 2050" identified 3 principles that guided every recommendation made in the plan. The principles included; inclusive growth, resilience and prioritized investment. Inclusive growth is a direct overlap between "On to 2050" and this plan. Both CMAP and Lake County have prioritized efforts providing opportunity for all residents.

Table 3 – Other local / regional / federal planning efforts

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

Units of local government were invited to participate in this plan. McHenry County was consulted on its experience with recent changes to its own homeless crisis response system and facilities.

OMB Control No: 2506-0117 (exp. 06/30/2018)

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

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

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

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

As part of the citizen participation process, Lake County collaborated with the Lake County Coalition for the Homeless (LCCH) and Corporation for Supportive Housing (CSH) to conduct a thorough Gaps Analysis of the Homeless Crisis Response System. The Gaps Analysis process included multiple citizen participation activities, including: interviews with key stakeholders, a Survey of Homeless Needs distributed among residents and service providers, a Housing Placement Satisfaction Survey distributed to homeless services clients, and a Coordinated Entry Survey distributed to clients who had been housed through the Coordinated Entry process. This input was incorporated into a comprehensive Gaps Analysis report with recommendations of how to address the needs of Lake County residents experiencing homelessness. These recommendations subsequently impacted the goal-setting process by helping Lake County to identify goals and priority needs.

OMB Control No: 2506-0117 (exp. 06/30/2018)

Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
1	Newspaper Ad	Minorities Non-English Speaking - Specify other language: Spanish Persons with disabilities Non-targeted/broad community	A newspaper ad was published on March 18, 2019 advertising the public hearings for the preparation of the 2020-24 Consolidated Plan. The publication was made in both English and Spanish language newspapers.	None	None	

OMB Control No: 2506-0117 (exp. 06/30/2018)

2	Public Hearing	Minorities Persons with disabilities Non-targeted/broad community	The first Public Hearing on the 2020-24 Consolidated Plan was held on April 17, 2019 in Libertyville, Illinois. In addition to 14 Lake County Housing & Community Development commissioners and staff, the Hearing was attended by David Fries of Catholic Charities; Ben Richards of the Waukegan Park District; Kori Larson of Glenkirk; Amanda Levinson of Arden Shore; Clint Van Winkle of Independence Center; Rob Anthony of Community Partners for Affordable Housing;	Diana Helt, of Great Lakes Adaptive Sports Association (GLASA), explained that her agency provides physical activity, health and wellness programing for people with physical disabilities. She was pleased to note, during the Analysis of Impediments (AI) presentation, that important issues affecting those with disabilities would continue to be included within the diversity discussion. Ms. Helt said that it was imperative that those with disabilities be considered when it came to provision of housing and programmatic access. She noted that GLASA has benefited from Community Development Block Grant awards, which has allowed great strides within the areas youth becoming involved in physical	Comments were accepted.	

OMB Control No: 2506-0117 (exp. 06/30/2018)

			Tim DeBruler of The DeBruler Company; Diana Helt of Great Lakes Adaptable Sports Association; Anna Viveros of Prairie State Legal Services; Richard Koenig of Housing Opportunity Development Corporation; and Nimrod Warda of the City of North Chicago.	activity, leading to accomplishments with their academic and career objectives. Anna Viveros, of Prairie State Legal Services (PSLS), informed the Housing and Community Development Commission of the agency's mission to assist the elderly, the disabled and low-income citizens with legal issues concerning housing need and fair housing. PSLS investigates complaints of housing discrimination, illegal housing practices and habitability problems. The agency is working closely with Community Development staff to gather and analyze data for the 2019 AI. She then spoke about the testing that PSLS carries out to determine if discrimination is being practiced by housing providers.		

OMB Control No: 2506-0117 (exp. 06/30/2018)

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
3	Public Meeting	Minorities Persons with disabilities Non-targeted/broad community	A public meeting was held on May 15, 2019 which included a presentation of the Chicago Metropolitan Agency for Planning (CMAP) regional Comprehensive Plan "On to 2050". As part of the presentation a survey was conducted that included topics related to the 3 principle ideas of the plan; Inclusive Growth, Resilience and Prioritized Investment. A total of twenty-three (23) persons participated in the survey.	In response to two housing-related questions, the audience responded that housing cost burden is Lake County's biggest challenge. The second biggest challenge reported is the lack of access to public transportation and resulting housing-job-transit mismatch in Lake County.	All comments were accepted.	

OMB Control No: 2506-0117 (exp. 06/30/2018)

4	Public Hearing	Minorities Persons with disabilities Non-targeted/broad community	The second Public Hearing on the 2020-24 Consolidated Plan was held on May 15, 2019 in Waukegan, Illinois. In addition to 16 Lake County Housing & Community Development commissioners and staff, the Hearing was attended by Dora Maya and Dil Dybas of Arden Shore; Katie Holley of A Safe Place; Jane Grover of Chicago Metropolitan Agency for Planning; Duke Ortiz of Mano a Mano; Ben Richards of the Waukegan Park District; Robbie Gorman of Mercy Housing Lakefront and Ken Barber of	Mr. Ken Barber of the Adelante Center for Entrepreneurship, spoke about how his mission was to help communities with economic challenges through entrepreneurship, community development and living wage job creation. Mr. Barber stated that he hopes that economic development will continue to be a priority for the upcoming Consolidated Plan.	Comments were accepted.	

OMB Control No: 2506-0117 (exp. 06/30/2018)

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)
			Adelante Center for Entrepreneurship.			
5	Internet Outreach	Residents of Public and Assisted Housing staff of nonprofit and government agencies, residents and advocates	There were 40 responses to the Survey of Homeless Needs from non-profit organizations, service providers, government agencies, concerned citizens, advocates, for-profit businesses, foundations, and charitable organizations.	Comments were confidential. Survey results were analyzed by a third party, the Corporation for Supportive Housing, and incorporated into the recommendations of the Gaps Analysis report provided to Lake County Community Development.	Comments were accepted.	
6	Personally approached	Clients of coordinated entry	There were six responses to the Housing Placement Satisfaction Survey.	Clients indicated that programs should have more focus on the individual, more focus on housing, more outreach workers, better communication with case managers, and more time with case managers.	Comments were accepted.	

OMB Control No: 2506-0117 (exp. 06/30/2018)

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)
7	Internet Outreach	Housing Providers	There were 11 responses to the Coordinated Entry Survey.	Survey results were analyzed by a third party, the Corporation for Supportive Housing, and incorporated into the recommendations of the Gaps Analysis report provided to Lake County Community Development.	Comments were accepted.	

OMB Control No: 2506-0117 (exp. 06/30/2018)

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)
8	Public Meeting	Non-targeted/broad community affordable housing developers	A public meeting of the Lake County Affordable Housing Advisory & Recommendation Committee (ARC) was held on May 31, 2019 with ARC members, staff and several housing providers in attendance.	The ARC discussed the need for the 2020-24 Consolidated Plan to continue the previous plan's focus on affordable housing by combining the previous three housing goals (Rehabilitate/Create/Support Families in Affordable Housing) into one major goal to maximize affordable housing in as many ways possible. The ARC discussed the difficulty of creating new permanent supportive housing in the last five-years, so received training from CSH on the Pay for Success model of expanding permanent supportive housing.	Comments were accepted.	

OMB Control No: 2506-0117 (exp. 06/30/2018)

9	Public Hearing	Non-targeted/broad community	The third Public Hearing on the 2020-24 Consolidated Plan was held on June 12, 2019 in Libertyville, Illinois. In addition to 20 Lake County Housing & Community Development commissioners and staff, the Hearing was attended by Beverly Mull of Scholars Soaring Cultural Center; Scott Goldstein of Teska Associates; Mandi Florip or Lake County Municipal League; Robbie Gorman of Mercy Housing Lakefront; Dulce Ortiz of Mano a Mano; Amanda Levinson and Dora Maya of Arden Shore; Kathleen	Ms. Beverly Mull of Scholars Soaring Cultural Center spoke about the need for youth literacy and educational programming; specifically in the City of Zion. She spoke directly about a project she is undertaking that consist of the construction of a new facility that would be dedicated to serving youth. Ms. Harriet Levy of the Center for Enriched Living (CEL) spoke about the ongoing need for funding dedicated for persons with disabilities. CEL has received CDBG funding in the past and Ms. Levy spoke about how those funds have had a positive impact on the persons attending CEL. Ms. Dulce Ortiz of Mano a Mano spoke about the increased needs for immigrant services in Lake County. Specifically there is a direct need for immigrants with	Comments were accepted.	

OMB Control No: 2506-0117 (exp. 06/30/2018)

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)
			O'Conner of Libertyville Township; Harriet Levy of Center for Enriched Living; Katie Holley of A Safe Place; Rob Anthony of Community Partners for Affordable Housing; Ben Richards of the Waukegan Park District and Stephanie Brown of Lake County Department of Transportation.	limited English proficiency and formal education. Mano a Mano is one of the few providers in Lake County to serve this growing population and she spoke about how the immigrant population is at greater risk to live in poverty. She expressed her hope that the population that her organization serves is accounted for in the Consolidated Plan.		

OMB Control No: 2506-0117 (exp. 06/30/2018)

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)
11	Public Meeting	Homeless Assistance Agencies	A public meeting of the Homeless Assistance Advisory & Recommendation Committee (ARC) was held on February 14 in Libertyville to discuss major homeless assistance projects in the 2020-24 Plan.	Lake County Coalition for the Homeless summarized the Gap Analysis of its Homeless Crisis Response System and outlined working models for needs identified such as an improved Resource Center and a Family Shelter. Agencies new to working with homeless youth in Lake County, The Harbour and ChildServ, presented their proposed projects for the 2020-24 timeframe. Thresholds, a provider of housing and services for people with mental health issues proposed to develop site-based permanent supportive housing, potentially in an integrated setting.	Comments were accepted.	

OMB Control No: 2506-0117 (exp. 06/30/2018)

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)
12	Public Meeting	Housing Developers	A public meeting of the Affordable Housing Advisory & Recommendation Committee (ARC) was held on February 14 in Libertyville to discuss major affordable housing projects in the 2020-24 Plan.	Community Partners for Affordable Housing (CPAH) proposed to work on new rental housing and proven housing programs---downpayment assistance, owner-occupied rehab and the community land trust model. The DeBruler Companies presented new senior housing in Mundelein and several agencies new to housing---Nicasa, Mano a Mano and Urban Muslim Minority Alliance (UMMA)---expressed desires to expand housing options for clients and public alike.	Comments were accepted.	

Table 4 – Citizen Participation Outreach

OMB Control No: 2506-0117 (exp. 06/30/2018)

Needs Assessment

NA-05 Overview

Needs Assessment Overview

As social scientist Alex Kotlowitz writes, "home is essential for maintenance of the inner spirit" and Lake County is proactive in this HUD Strategic Plan to address all residents' need for a home.

In its 2016 housing report, the Joint Center for Housing Studies at Harvard University projected that the percentage of severely cost-burdened households will increase 11 percent by 2025. In a broad sense, the national and local conversations about housing and poverty have intensified with today's housing crisis making headlines across the political spectrum. As a result, the need for better affordable housing is on the "radar screen" pressing some local government leaders to begin exploring local solutions. During the May 2019 meeting of Lake County's Housing & Community Development Commission (HCDC), member responses to the question, "What are the two biggest housing challenges in Lake County?", the biggest housing challenges in Lake County were identified as "supply of affordable housing units", "Housing--jobs--public transit mismatch" and housing "cost burden".

The data in the following Needs Assessment and Market Analysis section illustrate the heavy cost burden of housing in Lake County. This burden sharpens for ethnic and racial minorities and for people living in low- and moderate-income areas, to whom even "affordable" housing is often out of reach. Numbers of people newly homeless reached over 60% of the past year's level of inflow (>1,100 people) into Lake County's homeless service system. Never has the need for housing been more pronounced than today, over a decade since the 2008 housing crash halted new development and significant improvements to existing housing stock. Foreclosures in Illinois persist and push families into homelessness or into crowded affordable housing. The need for larger rental units remains acute, with homeless families remaining unhoused for months at a time due to lack of large, affordable rental units in Lake County.

OMB Control No: 2506-0117 (exp. 06/30/2018)

NA-10 Housing Needs Assessment - 24 CFR 91.405, 24 CFR 91.205 (a,b,c)

Summary of Housing Needs

HUD defines households as "cost-burdened" if they spend more than 30% of their household income on housing costs, which can create strain on household finances and reduce a household's ability to pay for other basic needs. This is particularly true if a household is low-to-moderate income. Households that spend more than 50% of their household income on housing are "*severely* cost-burdened." Housing assistance such as subsidized housing is a resource that helps low-to-moderate income families reduce the costs of housing and reduce the likelihood of becoming cost-burdened.

According to the 2011-2015 American Community Survey, in Lake County, 30.6% of owner-occupants with a mortgage and 19.1% of owner-occupants without a mortgage are cost-burdened. A significantly higher percentage of renters are cost-burdened; 49.5% of renter-occupied households pay more than 30% of their household income in rent. While the American Community Survey does not provide information about households that spend more than 50% of their household income on housing, many of the tables in this Needs Assessment provide information on severe cost burden as well as cost burden.

Of the six housing problems identified in the *Housing Needs Summary Tables* below, the greatest number of both renters (13,013) and owners (19,186) indicated that they were *severely* cost burdened, spending greater than 50% of their income on housing costs. Housing cost burden greater than 30% of income (and none of the above problems) was the second most reported housing problem, affecting 12,280 of renters and 17,628 of owners.

The prevalence of severe cost burden and cost burden signify a need for more affordable housing, especially for subgroups that are more likely to experience cost burden, such as renters.

Demographics	Base Year: 2009	Most Recent Year: 2015	% Change
Population	644,356	706,413	10%
Households	216,297	243,894	13%
Median Income	$66,973.00	$77,469.00	16%

Table 5 - Housing Needs Assessment Demographics

Alternate Data Source Name:
2000 Census (Manually Input)
Data Source Comments:

Number of Households Table

	0-30% HAMFI	>30-50% HAMFI	>50-80% HAMFI	>80-100% HAMFI	>100% HAMFI
Total Households	24,566	24,945	36,534	23,302	134,428

OMB Control No: 2506-0117 (exp. 06/30/2018)

	0-30% HAMFI	>30-50% HAMFI	>50-80% HAMFI	>80-100% HAMFI	>100% HAMFI
Small Family Households	8,740	8,643	14,514	10,210	77,768
Large Family Households	2,412	3,656	4,950	2,719	14,302
Household contains at least one person 62-74 years of age	4,042	5,046	7,443	4,651	26,903
Household contains at least one person age 75 or older	3,918	4,473	5,385	2,580	7,803
Households with one or more children 6 years old or younger	5,255	5,695	6,558	4,312	16,092

Table 6 - Total Households Table

Data Source: 2011-2015 CHAS

Housing Needs Summary Tables

1. Housing Problems (Households with one of the listed needs)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Substandard Housing - Lacking complete plumbing or kitchen facilities	429	210	183	60	882	29	44	163	63	299
Severely Overcrowded - With >1.51 people per room (and complete kitchen and plumbing)	170	188	150	95	603	50	58	99	130	337

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
Overcrowded - With 1.01-1.5 people per room (and none of the above problems)	812	994	585	119	2,510	262	603	479	429	1,773
Housing cost burden greater than 50% of income (and none of the above problems)	8,537	3,407	965	104	13,013	6,748	5,676	5,106	1,656	19,186
Housing cost burden greater than 30% of income (and none of the above problems)	1,469	5,391	4,298	1,122	12,280	950	3,621	7,859	5,198	17,628
Zero/negative Income (and none of the above problems)	1,312	0	0	0	1,312	776	0	0	0	776

Table 7 – Housing Problems Table

Data Source: 2011-2015 CHAS

OMB Control No: 2506-0117 (exp. 06/30/2018)

2. Housing Problems 2 (Households with one or more Severe Housing Problems: Lacks kitchen or complete plumbing, severe overcrowding, severe cost burden)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Having 1 or more of four housing problems	9,957	4,773	1,875	383	16,988	7,084	6,386	5,822	2,277	21,569
Having none of four housing problems	3,880	7,419	10,919	6,160	28,378	1,512	6,422	17,868	14,521	40,323
Household has negative income, but none of the other housing problems	1,312	0	0	0	1,312	776	0	0	0	776

Table 8 – Housing Problems 2

Data Source: 2011-2015 CHAS

3. Cost Burden > 30%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
NUMBER OF HOUSEHOLDS								
Small Related	4,672	4,040	2,272	10,984	2,386	2,972	5,612	10,970
Large Related	1,318	1,555	501	3,374	811	1,220	1,730	3,761
Elderly	2,237	1,703	1,156	5,096	3,260	4,477	4,108	11,845
Other	2,885	2,435	1,463	6,783	1,581	1,044	1,793	4,418
Total need by income	11,112	9,733	5,392	26,237	8,038	9,713	13,243	30,994

Table 9 – Cost Burden > 30%

Data Source: 2011-2015 CHAS

4. Cost Burden > 50%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
NUMBER OF HOUSEHOLDS								
Small Related	3,958	1,288	334	5,580	2,090	1,888	2,296	6,274
Large Related	993	547	30	1,570	696	654	368	1,718
Elderly	1,758	915	471	3,144	2,733	2,527	1,767	7,027
Other	2,575	857	193	3,625	1,485	768	666	2,919
Total need by income	9,284	3,607	1,028	13,919	7,004	5,837	5,097	17,938

Table 10 – Cost Burden > 50%

Data Source: 2011-2015 CHAS

5. Crowding (More than one person per room)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Single family households	876	1,056	469	102	2,503	282	450	372	325	1,429
Multiple, unrelated family households	75	135	248	79	537	35	185	197	229	646
Other, non-family households	50	0	10	25	85	0	20	0	0	20
Total need by income	1,001	1,191	727	206	3,125	317	655	569	554	2,095

Table 11 – Crowding Information - 1/2

Data Source: 2011-2015 CHAS

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
Households with Children Present	0	0	0	0	0	0	0	0

Table 12 – Crowding Information – 2/2

Data Source Comments:

Describe the number and type of single person households in need of housing assistance.

Low-to-moderate income families who are cost-burdened are in need of housing assistance. According to the 2011-2015 ACS 5-Year Estimates, 22.1% of householders are 1-person households, representing 18.3% of owner-occupied housing units and 33.1% of renter-occupied housing units. In Lake County, 30.6% of owner-occupants with a mortgage and 19.1% of owner-occupants without a mortgage are cost-burdened. A significantly higher percentage of renters are cost-burdened; 49.5% of renter-occupied households pay more than 30% of their household income in rent.

While the ACS data does not indicate what percentage of 1-person households are cost-burdened, it can be assumed that there are a significant number of single-person households that could benefit from housing assistance. As 1-person households comprise 18.3% of Lake County's 179,785 owner-occupied units and 33.1% of Lake County's 62,641 renter-occupied units, which are cost burdened at the rates described above, there are likely thousands of single-family households in need of housing assistance.

Estimate the number and type of families in need of housing assistance who are disabled or victims of domestic violence, dating violence, sexual assault and stalking.

The U.S. Census Bureau does not provide information on the number of families who are disabled or survivors of domestic violence (dv) that are cost-burdened and therefore in need of housing assistance. To estimate the number of families who may benefit from housing assistance, Lake County has extrapolated from census data on poverty and HMIS data on DV survivors. The Census utilizes nationwide "poverty thresholds" (or "poverty line") to calculate poverty at a population level. These are not utilized to determine financial eligibility for programs, such as the "poverty guidelines" utilized by other U.S. Departments. Additionally, the poverty definition utilizes money income before taxes and does not include noncash benefits such as public housing assistance or Medicaid.

Lake County utilizes the HOME Income Limits to determine eligibility for housing funded by HOME Investment Partnership Program funding. HOME Limits are determined based on the median income of households in the area. Households with incomes at or below 30% of the Area Median Income (AMI) are considered "Extremely Low Income (ELI)," households with incomes at or below 50% AMI are considered "Very Low Income (VLI)," and households with incomes at or below 80% AMI are considered "Low Income." All HOME-funded housing units must be reserved for low-income households, or those below 80% AMI. The Public Housing Agencies in Lake County utilize the Section 8 Limits, which defines "Extremely Low Income" as families whose income does not exceed the higher of the Federal poverty level or 30% of the area median income. Therefore, while poverty level can be used to determine numbers of households that could benefit from housing assistance, there are many more households that would be eligible for housing assistance through the HOME program or Section 8 programs than only those at or below the poverty level. The U.S. Census Bureau Poverty Threshold (weighted) for 2015 is $12,082 for a family of one, $15,391 for a family of two, $18,871 for a family of three, and $24,257 for a family of four.

OMB Control No: 2506-0117 (exp. 06/30/2018)

8.2% of Lake County residents (civilian noninstitutionalized population) have a disability. The data indicates that those living with a disability are far more likely than those living without a disability to have an income less than 100% of the poverty level, at rates of 15.4% and 9.1%, respectively. This equals an approximate 8,664 residents living with a disability with an income below 100% of the poverty level and approximately 57,124 residents living without a disability with an income below 100% of the poverty level. Similarly, those living with a disability are more likely to be unemployed (17%, or 4,326 individuals) than the general population (7.9%, or 42,944 individuals over 16). This indicates that those living with a disability are more likely to be in need of housing assistance.

According to HUD, individuals or families who are fleeing or attempting to flee domestic violence and who lack resources and support networks to obtain other permanent housing" are considered "Category 4" homeless. This includes those fleeing or attempting to flee dating violence, sexual assault, or stalking. For safety purposes, domestic violence shelters do not track their clients in the Homeless Management Information System, so it is difficult to estimate the exact number of domestic violence survivors who utilize housing programs such as emergency shelter, permanent supportive housing, and rapid rehousing. Due to the limited number of shelter beds, a portion of DV survivors are diverted from emergency shelter. Approximately 137 out of the 1375 (10%) people diverted in the Federal FY2019 reported a history of DV. 40 of those were actively fleeing their abuser upon intake.

What are the most common housing problems?

The Comprehensive Housing Affordability Strategy (CHAS), which is a U.S. Department of Housing and Urban Development (HUD) custom tabulation of the U.S. Census Bureau's American Community Survey (ACS) data, identifies four housing problems and four severe housing problems. The four housing problems include: incomplete kitchen facilities, incomplete plumbing facilities, more than 1 person per room, and cost burden greater than 30%. The four severe housing problems include: incomplete kitchen facilities, incomplete plumbing facilities, more than 1.5 persons per room, and cost burden greater than 50%.

The *Housing Needs Summary Tables 1. Housing Problems* of the NA-10 breaks these into categories of housing problem: substandard housing (lacking complete plumbing or kitchen facilities), severely overcrowded (>1.51 people per room), overcrowded (1.01-1.5 people per room), housing cost burden greater than 50% of income, housing cost burden greater than 30% of income, and zero/negative income. For the purposes of this discussion, any household with a housing cost burden greater than 50% of income will be referred to as severely cost-burdened.

Of the six housing problems identified in the table, the greatest number of both renters (13,013) and owners (19,186) indicated that they were severely cost burdened, spending greater than 50% of their income on housing costs. Housing cost burden greater than 30% of income (and none of the above problems) was the second most reported housing problem, affecting 12,280 of renters and 17,628of owners.

It is important to note that the *Housing Problems* table only includes the number of owners or renters that have the housing problem indicated and **no other housing problems**. The numbers of cost-burdened renters and owners is far greater than that indicated in the table. According to the 2011-2015 CHAS Summary Level Data for Lake County, the total number of owners with cost burden and severe cost burden is 31,440 and 21,730, respectively; much higher than the 17,628 and 19,186 in the *Housing Problems* table. Similarly, the total number of renters with cost burden and severe cost burden is 14,365 and 14,000, respectively; higher than the 12,280 and 13,013 in the *Housing Problems* table. This indicates that a high number of families who are experiencing cost burden or severe cost burden are also experiencing additional housing problems, such as overcrowding or substandard housing.

The prevalence of this issue is echoed in the 2011-2015 ACS 5-Year Estimates data, which indicates that 30.6% of owner-occupants with a mortgage, 19.1% of owner-occupants without a mortgage, and 49.5% of renter-occupied households pay more than 30% of their household income in rent.

While housing cost burden or severe housing cost burden are more common than other housing problems, this does not mean that this is the only issue present. The *Housing Problems* table shows that 882 renters and 299 owners reported substandard housing, 603 renters and 337 owners reported severe overcrowding, 2,510 renters and 1,773 owners reported overcrowding, and 1,312 renters and 776 owners reported a zero or negative income. Again, these numbers include only households that had the indicated issue and no other housing problems. On the 2011-2015 CHAS Summary Level Data, a total of 85,725 households report at least one of four housing problems; this number exceeds the 70,599 households on the *Housing Problems* table that report one issue but no other issues.

Are any populations/household types more affected than others by these problems?

According to the *Cost Burden > 30%* table and *Cost Burden > 50%* tables in this section, whether households rent or own may have an influence on the type of families more likely to be cost burdened or severely cost-burdened.

In terms of cost-burden, of renters, there are generally more families with lower incomes that are cost-burdened than families with higher incomes, regardless of whether that family is a small related, elderly, or other. Large related households are the exception with more cost-burdened households in the 30-50% AMI range than in the 0-30% AMI range. This pattern does not hold true for owners, which generally have more cost-burdened households at higher incomes than at lower incomes. Small related and large related households both have the highest number of cost burdened households in the 50-80% range and less in lower income levels. Elderly families have the highest number in the 30-50% range, and other households have the highest number in the 50-80% income level, though unlike with small and large related families, they do not decrease in number as income decreases.

In terms of severe cost-burden, of renters, there are more families with lower incomes that are severely cost-burdened than families with higher incomes, regardless of whether that family is a small related, large related, elderly, or other. This pattern holds true for most family types that are owners as well; as

OMB Control No: 2506-0117 (exp. 06/30/2018)

with renters, there are more large related, elderly, and other owner families who are severely cost burdened at lower incomes than at higher incomes. In terms of small related families, however, there are more small related owner families with incomes at 50-80% AMI that are severely cost-burdened than families with incomes at 30-50% AMI or 0-30% AMI.

It is important to note that the tables include total *numbers* of families and not *percentages*; while there may be more of one type of family (e.g. small related) or income level of family (e.g. 50-80% AMI) that is severely cost-burdened, this does not necessarily mean that that type or income level of family is overall more likely to severely cost burdened than another. For instance, there are more severely cost-burdened owners in small related families with incomes 50-80% AMI than severely cost-burdened owners in small related families with incomes at 0-30% AMI. This does not mean 50-80% income families are more likely to be affected by severe cost burden than families with less income (0-30% AMI); rather, this may indicate that there are overall fewer families with less income (0-30% AMI) that are homeowners.

Describe the characteristics and needs of Low-income individuals and families with children (especially extremely low-income) who are currently housed but are at imminent risk of either residing in shelters or becoming unsheltered 91.205(c)/91.305(c)). Also discuss the needs of formerly homeless families and individuals who are receiving rapid re-housing assistance and are nearing the termination of that assistance

Those who are served in Homelessness Prevention and Diversion programs are considered to be at imminent risk of residing in shelters or becoming unsheltered. In Federal FY 2019 (10/1/2018-9/30/2019), 597 people were served in Homelessness Prevention programs and 472 people were served in Diversion programs (1040 unduplicated people total), including 236 households with children and 173 households without children. The households included 372 adult females and 139 adult males. Approximately 19% of households included persons with disabilities and 17% had a history of domestic violence. 68% of households served identified as African American and 17% identified as Hispanic/Latino.

Rapid rehousing is targeted so that the intervention will be most effective. 70% of RRH households successfully exit to permanent housing. For those clients who are nearing the termination of assistance and not likely to successfully exit, their needs are met with ongoing case management for up to 16 months.

If a jurisdiction provides estimates of the at-risk population(s), it should also include a description of the operational definition of the at-risk group and the methodology used to generate the estimates:

For the purposes of this section, Lake County is defining the “at-risk” group as all families and individuals that participated in Homelessness Prevention or Diversion Programs in Federal Fiscal Year 2018. The at-

OMB Control No: 2506-0117 (exp. 06/30/2018)

risk population was determined by reviewing Homeless Management Information System (HMIS) data on Homelessness Prevention and Diversion Programs operating in Lake County. With the exception of Domestic Violence agencies, all Lake County Continuum of Care agencies participate in HMIS, which is a software application that stores client information of all the persons served by homelessness programs in the area. Client-level information is entered into the database to ensure that the numbers represent discrete users.

Specify particular housing characteristics that have been linked with instability and an increased risk of homelessness

There are no particular housing characteristics which have been linked with instability and an increased risk of homelessness; however, the data shows that some groups are overrepresented in the population of Lake County residents who are homeless or at imminent risk of homelessness.

For more information on the population of homeless Lake County residents, please see the “NA-40 Homeless Needs Assessment” section below.

For the purposes of this section, Lake County is considering all families served by Homelessness Prevention and Diversion programs as “at-risk” of homelessness. The data shows that several groups are overrepresented, including women, people with disabilities, and African Americans. Census data indicates that these subgroups of Lake County residents are also more likely to experience poverty.

The 1040 people served in FY2019 included 372 adult females and 139 adult males, a female-to-male ratio of 2.68. According to the 2010 Census, the female-to-male ratio of Lake County residents is 352,343:351,119, or 1.00. This indicates that females are more likely than males to be at imminent risk of homelessness. According to the 2011-2015 American Community Survey, households headed by single females are more likely to be in poverty: 29.3% of families with a single female head of household have household income less than 100% of the poverty level, compared to 8.7% of families in general. Similarly, 13.8% of families with single female householders have incomes less than 50% of the poverty level, compared to 3.3% of families in general.

13% of those served in HP or Diversion programs have a disability. According to the 2011-2015 American Community Survey, those with a disability are more likely to be in poverty than those without a disability. 15.4% of those with a disability have a household income less than 100% of the poverty level, compared to 9.1% of those without a disability. 7.3% of Lake County residents with a disability have a household income less than 50% of the poverty level, compared to 3.8% of those without a disability.

Blacks and African Americans are also overrepresented in the group of Lake County residents at-risk of homelessness. 64% of people served by Homelessness Prevention and Diversion Programs identified as African American, while the population of Lake County is approximately 7.9% black or African American (2011-2015 ACS). Additionally, 2011-2015 American Community Survey data indicates Black and African American residents are more likely to be in poverty. 9.6% of the Lake County population for

OMB Control No: 2506-0117 (exp. 06/30/2018)

whom poverty status is determines have household incomes less than 100% of the poverty level, while 26.9% of those who identify as Black or African American alone have household incomes less than 100% of the poverty level.

Discussion

The prevalence of severe cost burden and cost burden signify a need for more affordable housing. 2011-2015 American Community Survey data indicates that some subgroups are more likely to experience cost burden, such as renters. In Lake County, 30.6% of owner-occupants with a mortgage and 19.1% of owner-occupants without a mortgage are cost-burdened. A significantly higher percentage of renters are cost-burdened; 49.5% of renter-occupied households pay more than 30% of their household income in rent.

Lake County's HMIS data also indicates that some subgroups are more likely to be at-risk of homelessness, such as people with a disability, families with a history of domestic violence, households with single female heads of household, and Blacks and African Americans. 2011-2015 American Community Survey data indicates that these subgroups are more likely than the general population to experience poverty in Lake County.

NA-15 Disproportionately Greater Need: Housing Problems - 91.405, 91.205 (b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

Introduction

This section discusses the four housing problems, which are: lacks complete kitchen facilities, lacks complete plumbing facilities, more than one person per room, and cost burden greater than 30%.

According to 24 CFR 91.205, "disproportionately greater need exists when the percentage of persons in a category of need who are members of a particular racial or ethnic group in a category of need is at least 10 percentage points higher than the percentage of persons in the category as a whole." The categories of need include 0-30% AMI, 30-50% AMI, 50-80% AMI, and 80-100% AMI. Therefore, any racial or ethnic group within an income category which is experiencing housing problems at a rate which is more than 10 percentage points higher than the rate experienced by everyone in that income category will have disproportionately greater need.

Please note that in the following section, HUD's use of the term "jurisdiction" covers the entire geography of Lake County, including both unincorporated and incorporated areas.

0%-30% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	19,451	2,961	2,088
White	10,198	1,499	1,371
Black / African American	3,624	704	268
Asian	722	149	175
American Indian, Alaska Native	24	0	0
Pacific Islander	0	0	0
Hispanic	4,611	594	255

Table 13 - Disproportionally Greater Need 0 - 30% AMI

Data Source: 2011-2015 CHAS

*The four housing problems are:
1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4.Cost Burden greater than 30%

OMB Control No: 2506-0117 (exp. 06/30/2018)

30%-50% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	20,172	4,786	0
White	10,740	2,898	0
Black / African American	2,127	357	0
Asian	677	118	0
American Indian, Alaska Native	4	14	0
Pacific Islander	0	0	0
Hispanic	6,420	1,306	0

Table 14 - Disproportionally Greater Need 30 - 50% AMI

Data Source: 2011-2015 CHAS

*The four housing problems are:
1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4.Cost Burden greater than 30%

50%-80% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	19,866	16,637	0
White	13,088	9,837	0
Black / African American	1,236	1,259	0
Asian	927	463	0
American Indian, Alaska Native	65	39	0
Pacific Islander	0	0	0
Hispanic	4,375	4,758	0

Table 15 - Disproportionally Greater Need 50 - 80% AMI

Data Source: 2011-2015 CHAS

*The four housing problems are:
1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4.Cost Burden greater than 30%

80%-100% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	8,973	14,376	0
White	6,618	9,730	0
Black / African American	444	1,130	0
Asian	552	524	0
American Indian, Alaska Native	0	15	0
Pacific Islander	0	0	0
Hispanic	1,363	2,711	0

Table 16 - Disproportionally Greater Need 80 - 100% AMI

Data Source: 2011-2015 CHAS

*The four housing problems are:
1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4.Cost Burden greater than 30%

Discussion

Lake County as a whole experiences one or more housing problems at a rate of 79.4%, 80.8%, 54.4%, and 38.4% for income categories of 0-30%, 30-50%, 50-80%, and 80-100%, respectively. According to the tables, which are populated by 2011-2015 CHAS data, some racial or ethnic groups experience disproportionately greater need.

For the 0-30% AMI category, American Indians/Alaskan Natives have a disproportionately greater need. Lake County as a whole (both incorporated and unincorporated areas), within the 0-30% AMI category, experiences one or more housing problems at a rate of 79.4%. American Indians/Alaskan Natives within the 0-30% AMI category experience one or more housing problems at a rate of 100%, which is 20.6 percentage points higher than the entire County. Note that the sample size is small, as only 24 households who identify as American Indian or Alaskan Native are represented in this data.

For the 30-50% AMI category, no racial or ethnic group experiences a disproportionately greater need when it comes to housing problems. All racial and ethnic groups experience housing problems at a percentage lower than or within 10 percentage points higher than Lake County as a whole.

For the 50-80% AMI category, Asians have a disproportionately greater need. Countywide, the 50-80% AMI category experiences one or more housing problems at a rate of 54.4%. Asians within the 50-80% AMI category experience one or more housing problems at a rate of 66.7%, a 12.3 percentage point difference.

For the 80-100% AMI category, Asians have a disproportionately greater need. Countywide, the 80-100% AMI category experiences one or more housing problems at a rate of 38.4%. Asians within the 80-100% AMI category experience one or more housing problems at a rate of 51.3%, a 12.9 percentage point difference.

It is important to note that comparing racial or ethnic groups within an income category does not take into account if any racial or ethnic group is overrepresented in that income category. In terms of statistics, a group is overrepresented if they form a disproportionally large percentage of a given data set. For instance, according to the 2011-2015 American Community Survey, 7.9% of Lake County's total population identifies as black or African American; however, 18.8% of the households in the 0-30% AMI category which experience one or more housing problem identifies as black or African American. Therefore, while black and African American households do not have "disproportionately greater need" by HUD's standard, they are overrepresented in the Lake County population of households 0-30% AMI with one or more housing problems.

NA-20 Disproportionately Greater Need: Severe Housing Problems - 91.405, 91.205 (b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

Introduction

This section discusses the four severe housing problems, which are: lacks complete kitchen facilities, lacks complete plumbing facilities, more than 1.5 persons per room, and cost burden greater than 50%.

According to 24 CFR 91.205, "disproportionately greater need exists when the percentage of persons in a category of need who are members of a particular racial or ethnic group in a category of need is at least 10 percentage points higher than the percentage of persons in the category as a whole." The categories of need include 0-30% AMI, 30-50% AMI, 50-80% AMI, and 80-100% AMI. Therefore, any racial or ethnic group within an income category which is experiencing housing problems at a rate which is more than 10 percentage points higher than the rate experienced by everyone in that income category will have disproportionately greater need.

Please note that in the following section, HUD's use of the term "jurisdiction" covers the entire geography of Lake County, including both unincorporated and incorporated areas.

0%-30% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	17,041	5,392	2,088
White	9,072	2,654	1,371
Black / African American	3,074	1,249	268
Asian	701	169	175
American Indian, Alaska Native	14	10	0
Pacific Islander	0	0	0
Hispanic	3,973	1,227	255

Table 17 – Severe Housing Problems 0 - 30% AMI

Data Source: 2011-2015 CHAS

*The four severe housing problems are:
1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4.Cost Burden over 50%

OMB Control No: 2506-0117 (exp. 06/30/2018)

30%-50% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	11,159	13,841	0
White	6,657	7,004	0
Black / African American	865	1,633	0
Asian	470	329	0
American Indian, Alaska Native	4	14	0
Pacific Islander	0	0	0
Hispanic	3,088	4,649	0

Table 18 – Severe Housing Problems 30 - 50% AMI

Data Source: 2011-2015 CHAS

*The four severe housing problems are:
1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4.Cost Burden over 50%

50%-80% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	7,697	28,787	0
White	5,294	17,615	0
Black / African American	347	2,152	0
Asian	325	1,076	0
American Indian, Alaska Native	45	59	0
Pacific Islander	0	0	0
Hispanic	1,626	7,519	0

Table 19 – Severe Housing Problems 50 - 80% AMI

Data Source: 2011-2015 CHAS

*The four severe housing problems are:
1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4.Cost Burden over 50%

80%-100% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	2,660	20,681	0
White	1,616	14,714	0
Black / African American	104	1,470	0
Asian	248	841	0
American Indian, Alaska Native	0	15	0
Pacific Islander	0	0	0
Hispanic	659	3,401	0

Table 20 – Severe Housing Problems 80 - 100% AMI

Data Source: 2011-2015 CHAS

*The four severe housing problems are:
1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4.Cost Burden over 50%

Discussion

The jurisdiction as a whole experiences one or more severe housing problems at a rate of 69.5%, 44.6%, 21.1%, 11.4%, for income categories of 0-30%, 30-50%, 50-80%, and 80-100%, respectively. As household income increases, the rates of severe housing problems decrease.

According to the tables, which are populated by 2011-2015 CHAS data:

Within the 0-30% AMI category, there is no racial or ethnic group that experiences a disproportionately greater need when it comes to severe housing problems. All racial and ethnic groups experience severe housing problems at a percentage lower than or within 10 percentage points higher than the jurisdiction as a whole.

Within the 30-50% AMI category, Asians have a disproportionately greater need. The jurisdiction as a whole within the 30-50% AMI category experiences one or more severe housing problems at a rate of 44.6%. Asians within the 30-50% AMI category experience one or more severe housing problems at a rate of 58.8%, a difference of 14.2.

Within the 50-80% AMI category, American Indians/Alaskan Natives have a disproportionately greater need. The jurisdiction as a whole within the 50-80% AMI category experiences one or more severe housing problems at a rate of 21.1%. American Indians and Alaskan Natives within the 50-80% AMI

category experience one or more severe housing problems at a rate of 43.3%. This is 22.2 percentage points higher than the jurisdiction as a whole.

For the 80-100% AMI category, Asians have a disproportionately greater need. The jurisdiction as a whole within the 80-100% AMI category experiences one or more severe housing problems at a rate of 11.4%. Asians within the 80-100% AMI category experience one or more severe housing problems at a rate of 22.8%

As mentioned above, it is important to note that comparing racial or ethnic groups within an income category does not take into account if any racial or ethnic group is overrepresented in that income category.

NA-25 Disproportionately Greater Need: Housing Cost Burdens - 91.405, 91.205 (b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

Introduction

This section compares the cost burden of housing across racial and ethnic groups. The cost of housing is assessed by what portion of the household income is used for housing costs. Those who spend less than 30% of their income on housing costs are not considered cost-burdened. Those who spent 30-50% of their household income on housing costs are considered cost-burdened. Those who spend more than 50% of their household income on housing costs are considered severely cost-burdened.

According to 24 CFR 91.205(b)(2), "disproportionately greater need exists when the percentage of persons in a category of need who are members of a particular racial or ethnic group in a category of need is at least 10 percentage points higher than the percentage of persons in the category as a whole." Therefore, if any racial or ethnic group experiences cost burden or severe cost burden at a rate more than 10 percentage points higher than the jurisdiction as a whole, that racial or ethnic group has a disproportionately greater need.

Please note that in the following section, HUD's use of the term "jurisdiction" covers the entire geography of Lake County, including both unincorporated and incorporated areas.

Housing Cost Burden

Housing Cost Burden	<=30%	30-50%	>50%	No / negative income (not computed)
Jurisdiction as a whole	159,447	46,104	36,112	2,147
White	120,532	30,580	23,541	1,399
Black / African American	8,362	3,627	4,238	283
Asian	10,027	2,271	1,747	190
American Indian, Alaska Native	190	45	18	0
Pacific Islander	44	0	0	0
Hispanic	18,865	9,180	6,169	255

Table 21 – Greater Need: Housing Cost Burdens AMI

Data Source: 2011-2015 CHAS

Discussion

OMB Control No: 2506-0117 (exp. 06/30/2018)

The jurisdiction as a whole experiences housing cost burden (30-50%) at a rate of 19.1%. No racial or ethnic group experiences housing cost burden at a rate greater than 29.1%, so no racial or ethnic group has disproportionately greater need.

The jurisdiction as a whole experiences severe housing cost burden (>50%) at a rate of 14.9%. The Black and African American racial group experiences severe housing cost burden at a rate of 26.1%, 11.2 percentage points higher than the jurisdiction as a whole. Therefore, the Black and African American racial group has a disproportionately greater need when it comes to severe housing cost burden.

NA-30 Disproportionately Greater Need: Discussion - 91.205 (b)(2)

Are there any Income categories in which a racial or ethnic group has disproportionately greater need than the needs of that income category as a whole?

The jurisdiction as a whole experiences one or more housing problems at a rate of 79.4%, 80.8%, 54.4%, and 38.4% for income categories of 0-30%, 30-50%, 50-80%, and 80-100%, respectively, and one or more *severe*housing problems at a rate of 69.5%, 44.6%, 21.1%, 11.4%, for income categories of 0-30%, 30-50%, 50-80%, and 80-100%, respectively.

Please note that in this section, HUD's use of the term "jurisdiction" covers the entire geography of Lake County, including both unincorporated and incorporated areas.

According to HUD's definition of disproportionately greater need, the tables (populated by 2011-2015 CHAS data) indicate that:

- Within the 0-30% income category, **American Indians and Alaskan Natives** have disproportionately greater need (+20.6 percentage points) in terms of **housing problems** and **no racial or ethnic group** has disproportionately greater need in terms of **severe housing problems**.
- Within the 30-50% income category, **no racial or ethnic group** has disproportionately greater need in terms of **housing problems** and **Asians** have disproportionately greater need (+14.2 percentage points) in terms of **severe housing problems.**
- Within the 50-80% income category, **Asians** have disproportionately greater need (+12.3 percentage points) in terms of **housing problems** and **American Indians and Alaskan Natives** have disproportionately greater need (+22.2 percentage points) in terms of **severe housing problems.**
- Within the 80-100% income category, **Asians** have disproportionately greater need in terms of both **housing problems** (+12.9 percentage points) and **severe housing problems** (+11.4 percentage points)**.**

As noted above, it is important to note that comparing racial or ethnic groups within an income category does not take into account if any racial or ethnic group is overrepresented in that income category.

If they have needs not identified above, what are those needs?

Please refer to Lake County's Analysis of Impediments to Fair Housing Choice (AI) report, which expands on the housing and other needs of Lake County's residents.

Are any of those racial or ethnic groups located in specific areas or neighborhoods in your community?

According to the 2012 ACS 5-year estimates, there are several neighborhoods with higher concentrations of both Asians and American Indians/Alaskan Natives. Please refer to Lake County's Analysis of Impediments to Fair Housing Choice (AI) report to review maps that illustrate the neighborhoods with higher concentrations of racial and ethnic groups.

NA-35 Public Housing - 91.405, 91.205 (b)

Introduction

Public housing agencies are important partners in the preservation and development of quality affordable housing and Lake County welcomes and encourages collaboration between public housing agencies and other organizations that help Lake County residents in need.

Totals in Use

Program Type									
	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project - based	Tenant - based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
# of units vouchers in use	0	0	596	2,510	190	2,174	18	128	0

Table 22 - Public Housing by Program Type

***includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition**

Data Source: PIC (PIH Information Center)

Characteristics of Residents

Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers				
				Total	Project - based	Tenant - based	Special Purpose Voucher	
							Veterans Affairs Supportive Housing	Family Unification Program
Average Annual Income	0	0	12,703	13,234	15,119	13,263	15,744	9,587
Average length of stay	0	0	5	6	3	6	1	2

OMB Control No: 2506-0117 (exp. 06/30/2018)

Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers				
				Total	Project - based	Tenant - based	Special Purpose Voucher	
							Veterans Affairs Supportive Housing	Family Unification Program
Average Household size	0	0	2	2	1	2	1	3
# Homeless at admission	0	0	0	0	0	0	0	0
# of Elderly Program Participants (>62)	0	0	257	537	153	380	2	2
# of Disabled Families	0	0	133	659	7	636	3	13
# of Families requesting accessibility features	0	0	596	2,510	190	2,174	18	128
# of HIV/AIDS program participants	0	0	0	0	0	0	0	0
# of DV victims	0	0	0	0	0	0	0	0

Table 23 – Characteristics of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)

Race of Residents

Program Type									
Race	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project - based	Tenant - based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
White	0	0	370	1,213	147	980	7	79	0
Black/African American	0	0	203	1,251	33	1,167	11	40	0

OMB Control No: 2506-0117 (exp. 06/30/2018)

Program Type									
Race	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project - based	Tenant - based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
Asian	0	0	13	22	9	13	0	0	0
American Indian/Alaska Native	0	0	7	16	0	9	0	7	0
Pacific Islander	0	0	3	8	1	5	0	2	0
Other	0	0	0	0	0	0	0	0	0
*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition									

Table 24 – Race of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)

Ethnicity of Residents

Program Type									
Ethnicity	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project - based	Tenant - based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
Hispanic	0	0	71	184	5	151	0	28	0
Not Hispanic	0	0	525	2,326	185	2,023	18	100	0
*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition									

Table 25 – Ethnicity of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)

OMB Control No: 2506-0117 (exp. 06/30/2018)

Section 504 Needs Assessment: Describe the needs of public housing tenants and applicants on the waiting list for accessible units:

Of the 382 households on North Chicago Housing Authority's waitlist for vouchers, 21 households have a member with a disability.

Of the 163 households on Waukegan Housing Authority's waitlist for vouchers, 16 households have a member with a disability.

Of the 2193 households on Lake County Housing Authority's waitlist for vouchers, 308 households have a member with a disability. On the ADA-specific public housing waiting list, there are 427 households waiting for one of 28 units that are mobility accessible, 133 households waiting for one of 14 units that are hearing accessible, and 164 households waiting for one of 14 units that are visual accessible.

What are the number and type of families on the waiting lists for public housing and section 8 tenant-based rental assistance? Based on the information above, and any other information available to the jurisdiction, what are the most immediate needs of residents of public housing and Housing Choice voucher holders?

North Chicago Housing Authority has 176 households on the waiting list for public housing units and 382 households on the housing choice voucher (section 8 tenant-based rental assistance) waiting list. North Chicago Housing Authority has indicated that residents of public housing and tenant-based units are in need of supportive services. Additionally, the most immediate need of voucher holders is more quality affordable units in North Chicago that will accept the housing choice voucher at a price that is attainable.

Waukegan Housing Authority has 488 households on the waiting list for public housing units and 163 households on the housing choice voucher (section 8 tenant-based rental assistance) waiting list. Waukegan Housing Authority has indicated that residents of public housing and tenant-based units are in need of supportive services such as legal help, counseling, and childcare.

Lake County Housing Authority has 4,410 households on the waiting list for public housing units and 2,193 households on the housing choice voucher (section 8 tenant-based rental assistance) waiting list. Lake County Housing Authority has indicated that residents of public housing are in need of access to healthcare, transportation, and support services. Residents of housing choice vouchers are in need of assistance in securing a unit in low poverty areas, transportation, daycare, and utility assistance.

How do these needs compare to the housing needs of the population at large

The supportive service needs are similar to the needs of the population at large; however, the housing authority policies prevent housing problems that many of the public face, such as overcrowding, substandard conditions, and housing cost burden.

OMB Control No: 2506-0117 (exp. 06/30/2018)

Discussion

The high number of households on the waiting lists for public housing units and housing choice vouchers indicate that housing cost is a significant problem for thousands of households in Lake County. In addition to the needs described above, some of Lake County's Public Housing Agencies have recently experienced challenges in providing quality housing and programs to public housing residents and housing choice voucher holders. These challenges, identified during HUD audits, have been publicized in local newspapers. A HUD Office of Inspector General audit of the Lake County Housing Authority found issues with the implementation of the Family Self-Sufficiency Program and Housing choice Voucher Program, including incomplete paperwork and errors in the calculations of incomes or balances. Similarly, a HUD Office of Inspector General audit of North Chicago Housing Authority found that a number of units that had recently passed housing quality inspections had inspection violations, some of which comprised significant issues. Lake County recognizes that Public Housing Agencies are crucial to providing much needed subsidies and programs, and is committed to partnering with the local housing authorities to improve the implementation of programs that help Lake County's low-income residents.

NA-40 Homeless Needs Assessment - 91.405, 91.205 (c)

Introduction:

The Lake County Coalition for the Homeless is Lake County's Continuum of Care (CoC), which is also funded by the Department of Housing and Urban Development (HUD). The Final Rule Defining Homeless established the definitions that must be used for all Continuum of Care Programs.

HUD Definitions:

At-risk of Homelessness

Individuals and families who:

1. Have an annual income below 30 percent of median family income for the area, as determined by HUD, and
2. Do not have sufficient resources or support networks, immediately available to prevent them from moving to an emergency shelter or place not meant for habitation, and
3. Exhibit one or more risk factors of homelessness, including recent housing instability or exiting a publicly funded institution or system of care such as foster care or a mental health facility

Chronically homeless

1. A homeless individual with a disability who lives in a place not meant for human habitation, a safe haven, or in an emergency shelter, and has been homeless and living there for at least 12 months continuously or at least 12 months on at least 4 separate occasions in the last 3 years, or
2. An individual who has been residing in an institutional care facility, including a jail, substance abuse or mental health treatment facility, hospital, or other similar facility, for fewer than 90 days and met all of the criteria in paragraph (1) of this definition, before entering that facility; or
3. A family with an adult head of household (or if there is no adult in the family, a minor head of household) who meets all of the criteria in paragraph (1) or (2) of this definition, including a family whose composition has fluctuated while the head of household has been homeless.

OMB Control No: 2506-0117 (exp. 06/30/2018)

Homeless (includes four categories)

1. Literally Homeless: An individual or family who lacks a fixed, regular, and adequate nighttime residence, such as those living in emergency shelters, transitional housing, or places not meant for habitation, including an individual exiting an institution where he or she resided for 90 days and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution, or
2. Imminent Risk of Homelessness: An individual or family who will imminently lose their primary nighttime residence (within 14 days), provided that no subsequent housing has been identified and the individual/family lacks support networks or resources needed to obtain housing, or
3. Homeless under other Federal Statutes: Unaccompanied youth under 25 years of age, or families with children and youth who qualify under other Federal statutes, such as the Runaway and Homeless Youth Act, have not had a lease or ownership interest in a housing unit in the last 60 or more days, have had two or more moves in the last 60 days, and who are likely to continue to be unstably housed because of disability or multiple barriers to employment, or
4. Fleeing/Attempting to Flee DV: An individual or family who is fleeing or attempting to flee domestic violence, dating violence, sexual assault, stalking, or other dangerous or life-threatening conditions that relate to violence against the individual or a family member, and has no other residence, and lacks the resources or support networks to obtain other permanent housing.

Sheltered is used to describe a literally homeless individual or family who is living in an emergency shelter or transitional housing.

Unsheltered is used to describe a literally homeless individual or family who is living in a place not meant for human habitation, such as a car, tent, or outdoors.

Homeless Needs Assessment

Population	Estimate the # of persons experiencing homelessness on a given night		Estimate the # experiencing homelessness each year	Estimate the # becoming homeless each year	Estimate the # exiting homelessness each year	Estimate the # of days persons experience homelessness
	Sheltered	Unsheltered				
Persons in Households with Adult(s) and Child(ren)	0	95	408	230	191	94

OMB Control No: 2506-0117 (exp. 06/30/2018)

Population	Estimate the # of persons experiencing homelessness on a given night		Estimate the # experiencing homelessness each year	Estimate the # becoming homeless each year	Estimate the # exiting homelessness each year	Estimate the # of days persons experience homelessness
	Sheltered	Unsheltered				
Persons in Households with Only Children	0	0	0	0	0	0
Persons in Households with Only Adults	32	125	669	426	278	67
Chronically Homeless Individuals	7	18	126	27	35	87
Chronically Homeless Families	0	1	10	1	1	96
Veterans	0	1	38	33	21	15
Unaccompanied Child	3	15	4	2	0	7
Persons with HIV	0	2	7	1	3	93

Table 26 - Homeless Needs Assessment

Data Source Comments:

Data Limitations:

HUD requires all Continuums of Care to manage an HMIS database, which is a software application that stores client information of all the persons served by homelessness programs in the area. The information in the tables below details data collected in HMIS. It is important to note the limitations of the data.

First, the HMIS data described below includes only that for literally homeless clients, which is the first category in the definition of homeless above. There are many more individuals and families in need of housing assistance than just those that are literally homeless according to HUD's definition.

Second, for safety purposes, Domestic Violence agencies do not participate in HMIS.

Third, the estimates of sheltered and unsheltered homeless are based on the Point in Time (PIT) Count. The PIT Count is required by HUD and is a once annual count of all sheltered and unsheltered literally homeless people in a community on a given day in January. The PIT Count produces

useful data and is the only measure of unsheltered homeless individuals; however, it is important to note the methodology's limitations and recognize that the PIT Count does not fully capture the breadth of homelessness in any community.

HUD CoC System Performance Measures (SPMs) Analysis

Increasingly, HUD has relied on objective data to evaluate and fund local communities through the Continuum of Care Notice of Funding Availability (CoC NOFA). System performance data, along with data from the PIT count and HIC are becoming integral to the Con Plan and CAPER processes. The System Performance Measures (SPMs) are seven priority measures identified by HUD to evaluate a community's homeless response system. The measures touch on three core themes of an ideal homeless response system: to make homelessness rare, brief, and non-recurring (only one time). SPMs are submitted yearly, along with PIT, HIC, APRs, and LSA (formerly AHAR) as part of a large and comprehensive data-reporting package required of communities.

The SPMs in brief:

1. Length of time persons remain homeless
2. Extent to which persons who exit homelessness (are housed) do not return to homelessness
3. Number of homeless persons (participating in HMIS)
4. Employment and income growth for homeless persons in CoC Program-funded projects
5. Number of persons who become homeless for the first time
6. Homelessness prevention and housing placement of persons defined by category 3 of HUD's homeless definition in CoC Program-funded projects
7. Successful permanent housing placement

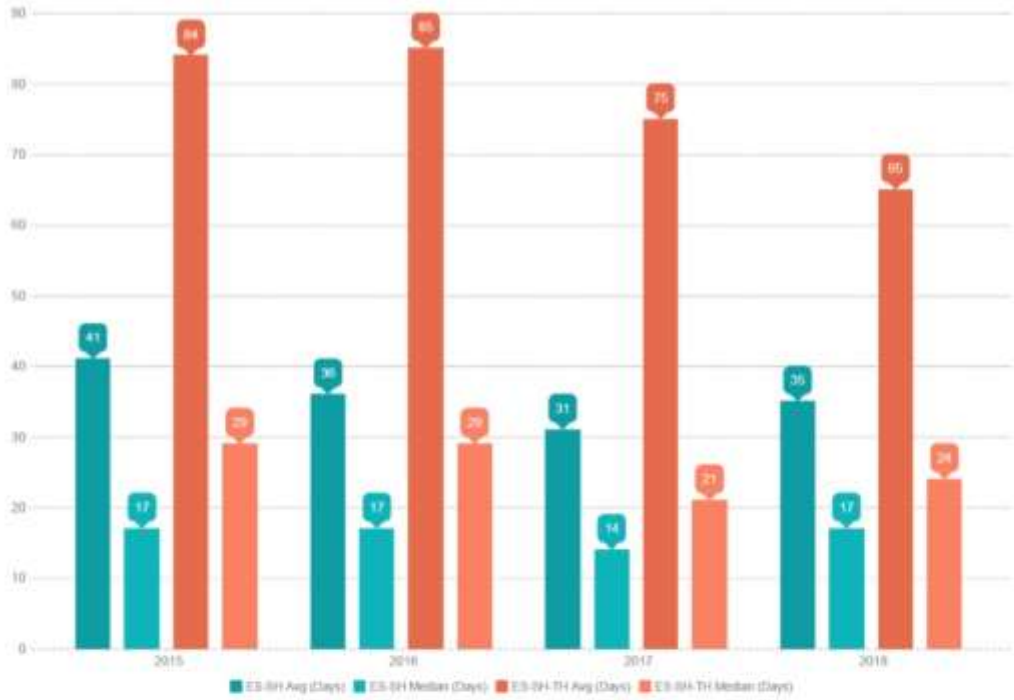
The following analysis will focus mainly on measures 1, 2, 5 (including 3), and 7. Measure 4 is a subset of programs in the community and may not provide a large enough picture of income and benefits in the community for this context. Measure 6 focuses on homeless prevention and housing placement of persons who are homeless as defined by category 3.

Category 3 homelessness is a rather complex definition25 of unaccompanied youth or families with minor children who are homeless by another federal statute or have a distinctive history of housing instability, but still do not meet category 1, literal homelessness or category 2, imminent

OMB Control No: 2506-0117 (exp. 06/30/2018)

risk of homelessness. Under HUD rules, CoC funding cannot be used to serve this population without written approval as provided in 24 CFR 578.89.

It should be noted that in no small part are these numbers affected by HMIS data quality and the quality of the HIC, PIT, SPM, and the other HUD reports, which are complex and consequential prerequisites to many funding sources. Lake County has demonstrably improved its data quality over the last few years to make these analyses possible. Few communities can report a complete HMIS shelter bed coverage or an HMIS staff dedicated to quality reporting, training, and capacity building in the community.


90
80
70
60
50
40
30
20
10
0
41
17
84
29
36
17
85
29
31
14
75
21
36
17
66
24
2015
2016
2017
2018
ES-RH Avg (Days)
ES-RH Median (Days)
ES-RH-TH Avg (Days)
ES-RH-TH Median (Days)

o

Measure 1: Average and Median Lengths of Stay in ES and ES+TH 2015-2018

Measure 1: Length of Time Persons Remain Homeless

Measure 1 has two parts, both calculating the average and median length of time persons are homeless. The first part is for those in emergency shelter (ES) and safe haven programs, the other part includes persons in transitional housing (TH) programs.

This measure provides the average and median of the total number of days people spend in an ES, SH, or TH, regardless of the number of program enrollments, within the year.

The averages are higher than the medians in the above graph. The difference is especially pronounced once transitional housing is added. There may be a few causes related to either data quality, service population and project type, or a mixture of the two.

From a data quality perspective, it may be a quite common error where open records in HMIS of persons or families who have moved on from a program are not “closed” in HMIS. As time goes on, these “open” records become outliers and drive up the average. Additionally, some TH programs not being publicly funded may affect the usual checks for data quality through the APR process and the HMIS administrator tools to request corrections from providers. From a program perspective, TH programs may serve participants up to 24 months, so a higher length of stay compared to shorter-term ES programs is not unusual.

This metric has an important, but narrow view of length of time homeless. Communities may adopt other metrics to gain a more comprehensive view, which would require project or client level data. Additional metrics may include HMIS data or PHA data and cover process steps, which may be reduced by adopting or changing policies, barrier busting, and communication among stakeholders. Below are some examples of these process metrics:

Questions for HMIS:

- How many assessments are conducted? How many unduplicated persons were assessed?

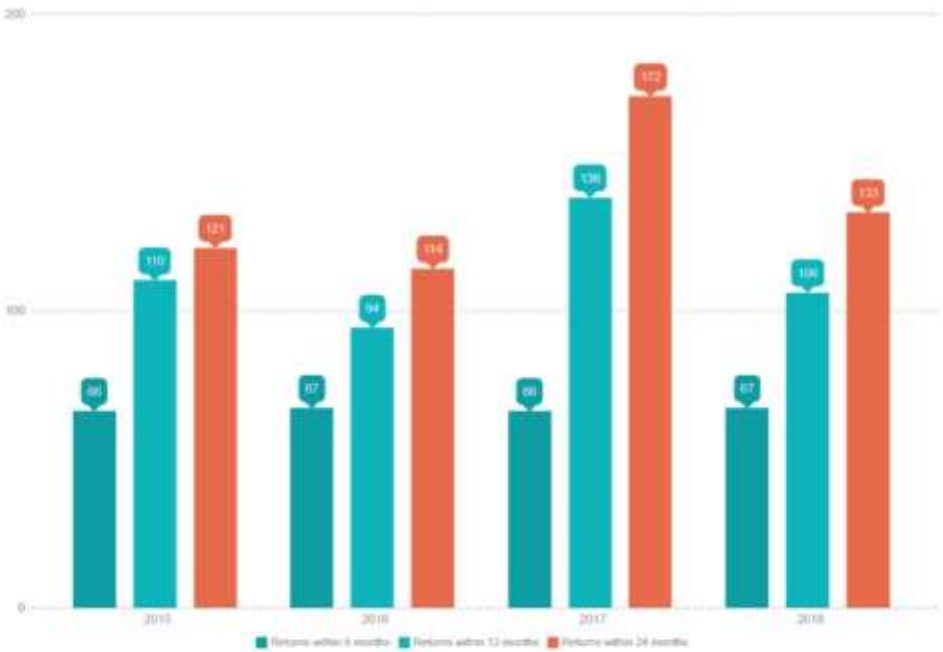
OMB Control No: 2506-0117 (exp. 06/30/2018)

- How many days from RRH program entry to RRH move-in?
- How long persons remain on an RRH subsidy?
- How many days from PSH program entry to PSH move-in?

Questions for PHAs

- How many vouchers applied for/issued to persons experiencing homelessness?
- How many days from voucher application to issuance?
- How many days from voucher issuance to move-in?

OMB Control No: 2506-0117 (exp. 06/30/2018)


200
100
0
86
110
121
87
94
114
86
136
172
87
106
123
2015
2016
2017
2018

o

Measure 2: Returns to Homelessness within 6, 12, and 24 months, 2015-2018

Year	2015	2015	2016	2016	2017	2017	2018	2018
	Nat'l Avg.	Lake County	Nat'l Avg.	Lake County	Nat'l Avg.	Lake County	Nat'l Avg.	Lake County
Returns within 6 months	10%	14%	10%	12%	9%	11%	N/A	11%
Returns within 12 months	14%	24%	14%	17%	14%	23%	N/A	17%
Returns within 24 months	20%	26%	20%	21%	20%	28%	N/A	21%

Table 27 - Measure 2: National Averages vs Lake County Outcomes

Measure 2: Extent to which persons who exit homelessness do not return to homelessness

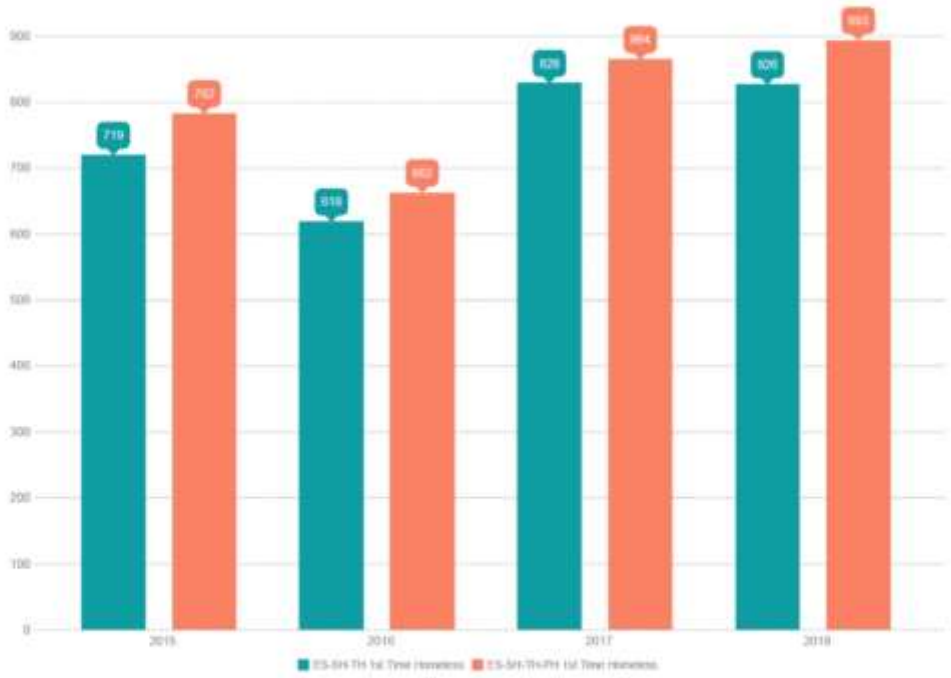
The client universe that makes up this measure is all those who participated in an HMIS program *and* exited to a permanent housing destination (*e.g.,* rental situation, permanent supportive housing, family and friends) in the two years *prior* to the SPM report period. For example, for the FY 2018 report period, the look back would start FY 2016. After the universe is calculated, the measure looks for a subsequent record in HMIS to see if that person or family "returned" to the system. Dividing the returned group by the universe produces the return rate percent.

It is important to note when reviewing this metric that there is a "lag" as the above chart and table shows the results of placements from up to two years ago. Additionally, the national trend shows an increase in rates of return as time advances, consistent with the trend in Lake County, though the rates in Lake County are higher than the national average.

As with all these metrics, a two-pronged analysis of data quality and program performance should be conducted. Timeliness and accuracy of data entry are especially critical to this metric because of the two-year look back. If a record is left open or entered after the event occurred and not properly backdated, it may lead to errors. At a system-level, it is difficult to observe these issues and identify them for correction. Often, continued training and support along with provider engagement are the most effective tools in improving data quality.

Deeper analysis of client data on a population-level and a project-level will help identify potential program or policy gaps. For example, looking at the adults only households to households with minor children. How do the rates of return for these populations compare? How do they compare from 6-months to 24 months? What are the range of services offered to each population? Which cohorts of programs have higher rates of return? Particularly among Homeless Prevention (HP), Rapid Re-Housing (RRH) and Permanent Supportive Housing (PSH), which provide direct financial assistance to participants. How long are participants receiving RRH or HP rental subsidies? How is level of need determined for financial assistance?

OMB Control No: 2506-0117 (exp. 06/30/2018)



o

Measure 5: Number of Persons who Become Homeless for the First Time ES-SH-TH vs. ES-SH-TH-PH

	2015	2015	2016	2016	2017	2017	2018	2018
	#	%	#	%	#	%	#	%
ES-SH-TH 1st Time Homeless	719	58%	618	58%	828	69%	826	67%
ES-SH-TH-PH 1st Time Homeless	782	63%	662	63%	864	72%	893	73%
Total HMIS Count	1232		1059		1199		1227	

Table 28 - Measure 5: Numbers and Percentages, 2015-2018

Measure 5: Number of Persons who Become Homeless for the First Time

First time homeless looks at all persons who *entered* an HMIS program during the report year and looks back two years to determine if the same persons had prior engagements with an HMIS program. If no record is found, they would be considered homeless for the first time. Dividing first time homeless records (Measure 5) by the total HMIS count of persons homeless (Measure 3), a rate is determined.

The two parts of this measure observe crisis interventions (ES, Safe Haven (SH), and TH) and crisis interventions, plus permanent housing interventions (ES, SH, TH, RRH, and PSH).

This measure is to assess the homeless response systems ability to ensure persons experience homeless is non-recurring. The vision of "functional zero" put forward by HUD in creating a system to end homelessness is not necessarily that no one will ever experience homelessness ever again. "Functional zero" is about creating a system that rapidly responds to a person's housing instability, preventing homelessness, providing tailored and appropriate crisis services, and quickly returning someone to housing. A higher rate of persons experiencing homelessness for the first time, coupled with a relatively static number of total persons experiencing homelessness is not necessarily negative in building toward functional zero and ideal system where homelessness is a one-time experience or prevented altogether.

Measure 7: Successful Permanent Housing Placement

OMB Control No: 2506-0117 (exp. 06/30/2018)

Also broken into two parts, the first (7a) measuring successful permanent housing placement from Street Outreach (SO) projects and the other (7b) measuring successful placement in from ES, Safe Haven (SH), TH, and RRH (7b1) or retention of permanent housing from RRH or PSH projects (7b2).

Year	2018	2017	2016	2015
Total Persons Exiting Street Outreach (SO)	104	62	0	0
Total Persons Exited SO to Temporary Destinations	38	11	0	0
Total Persons Exited SO to Permanent Destinations	39	35	0	0
Percent with Successful SO Outcome	74%	74%	N/A	N/A

Table 29 - Measure 7a: Successful Permanent Housing Placement from Street Outreach 2015-2018

Measure 7a: Successful Permanent Housing Placement from Street Outreach

The first Street Outreach (SO) project started in FY 2017, which is why there is no information for FY 2015 or FY 2016. A successful outcome for a SO project includes a placement directly into permanent housing or a placement into a temporary situation, like an emergency shelter bed or transitional housing, as most persons encountered in the project will be unsheltered.

The rate of permanent placement in both reporting years is impressive, especially considering the very small scale of the one operating SO project; literally a one-person operation. The SO project achieved a 56 percent PH placement rate in 2017 and a 38 percent PH placement rate in 2018. While these are indeed very positive outcomes, it should be noted that the successful SO depends on positive relationships and trust between the SO program and crisis service providers, permanent housing providers, and above all, persons experiencing homelessness who are served by the SO project. It also relies on an adequate infrastructure of crisis and permanent services in a community in a system where all interventions coordinate, combine, and enhance each other.

Indicate if the homeless population is: Has No Rural Homeless

OMB Control No: 2506-0117 (exp. 06/30/2018)

If data is not available for the categories "number of persons becoming and exiting homelessness each year," and "number of days that persons experience homelessness," describe these categories for each homeless population type (including chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth):

Not applicable; data is available for "number of persons becoming and exiting homelessness each year," and "number of days that persons experience homelessness."

OMB Control No: 2506-0117 (exp. 06/30/2018)

Nature and Extent of Homelessness: (Optional)

Race:	Sheltered:	Unsheltered (optional)
White	116	19
Black or African American	87	12
Asian	1	1
American Indian or Alaska Native	0	0
Pacific Islander	0	0
Ethnicity:	**Sheltered:**	**Unsheltered (optional)**
Hispanic	170	26
Not Hispanic	50	6

Data Source Comments: HMIS

Estimate the number and type of families in need of housing assistance for families with children and the families of veterans.

Families: All low-income families who are cost burdened or severely cost burdened are in need of housing assistance; however, for the purposes of this section, families in need of housing includes those at imminent risk of homelessness and those who are literally homeless.

- As discussed in section "NA-10 Housing Needs Assessment" above, families at imminent risk of homelessness includes all families served by Homelessness Prevention and Diversion Programs. In Federal FY 2019, 236 households with children were served, equaling approximately 58% of all households served by these programs.
- Families who are literally homeless includes all those who are living in a shelter (sheltered) or a place not meant for human habitation (unsheltered). In FY 2019, 408 persons (approximately 143 families) in family households with both adults and children experienced homelessness, equaling approximately 38% of all individuals who experienced homelessness. This number includes youth families, where the head of household is under age 25.
- The 2019 PIT Count found 26 sheltered families (95 individuals) with both adults and children, equaling approximately 38% of all sheltered individuals found. The 2019 PIT Count found 0 unsheltered families.
- Additionally, the Regional Office of Education reported 1,336 homeless students in 2019.

Veterans: All low-income veterans who are cost burdened or severely cost burdened are in need of housing assistance; however, for the purposes of this section, veterans in need of housing includes those at imminent risk of homelessness and those who are literally homeless.

- As discussed in section “NA-10 Housing Needs Assessment” above, families at imminent risk of homelessness includes all families served by Homelessness Prevention and Diversion Programs. In Federal FY 2019, 11 veterans were served, equaling approximately 1% of all individuals served by these programs.
- Families who are literally homeless includes all those who are living in a shelter (sheltered) or a place not meant for human habitation (unsheltered). In FY 2019, 38 veterans experienced homelessness.
- The 2019 PIT Count found 2 sheltered and 0 unsheltered literally homeless veterans.
- On December 31, 2018, Community Solutions certified Lake County as achieving Functional Zero for veterans; Lake County is the 10th community in the nation to achieve this. This means that outflow is greater than inflow of homeless veterans and Lake County has created a system that successfully and quickly responds to veteran homelessness. Additionally, the current by-name lists of individuals experiencing chronic or veteran homelessness has been certified as high quality, meaning it meets the 10 criteria required to ensure high data quality and a coordinated outreach strategy. The Coalition received certifications from both the United States Interagency Council on Homelessness and the Built for Zero Campaign, and announced an end to veteran homelessness in Lake County on July 2, 2019.

Describe the Nature and Extent of Homelessness by Racial and Ethnic Group.

The table above includes only the 252 individuals found at the 2019 Point in Time (PIT) Count. Of those identified in the PIT Count, 99 (39.3%) identified as Black or African American, 135 (53.6%) identified as White, 2 (.8%) identified as Asian, and 16 (6.3%) identified as multiple races. No individuals or families identifying as American Indian, Alaskan Native, Native Hawaiian, or Pacifica Islander were identified. 196 (77.8%) reported their ethnicity as Hispanic and 56 (22.2%) reported their ethnicity as not Hispanic.

As noted in the introduction above, the PIT Count has its limitations. To assess whether there are racial disparities in the provision or outcome of homeless assistance in Lake County, the Lake County Coalition for the Homeless conducted an Analysis of Racial Disparity within the Homeless Services System. The analysis investigated HMIS data for the Federal FY 2017, which occurred between October 1, 2016 and September 30, 2017. As with all HMIS data, the analysis did not incorporate information from clients accessing services through Domestic Violence agencies. The report assessed overrepresentation and investigated outcomes such as length of time homeless, returns to homelessness within one year, returns to homelessness within 2 years, positive exits from street outreach, exits from shelter and transitional housing, exits from permanent housing, and retention in permanent housing.

Of the 1,190 individuals who experienced homelessness in Lake County in FY 2017, 667 (56.1%) identified as Black or African American, 506 (42.5%) identified as White, 10 (.008%) identified as Asian, 2 (.002%) identified as American Indian or Alaskan Native, and 1 (.001%) identified as Native Hawaiian or Pacifica Islander. An additional 4 people (.003%) refused to report their race. The report found that Blacks and African Americans are overrepresented in the homeless population, comprising 42.5% of the homeless population but only 7.8% of Lake County’s population. The report also found that outcomes

OMB Control No: 2506-0117 (exp. 06/30/2018)

were similar for Blacks and African Americans and Whites. For more information about the outcomes investigated in the report, please see the Discussion section below.

Though the Racial Disparity report found rates of success to be comparable across racial groups, the results of the analysis raised additional questions by the Strategic Planning and System Performance Committee, who will continue to monitor racial equity in Lake County's homeless response system.

Describe the Nature and Extent of Unsheltered and Sheltered Homelessness.

The sheltered and unsheltered count described in the "Nature and Extent of Homelessness" and "Homeless Needs Assessment" tables above are taken from the Point in Time (PIT) Count. As mentioned in the introduction above, the PIT Count has several limitations which may underrepresent total numbers of residents experiencing homelessness. While the 2019 PIT Count indicates approximately 220 sheltered homeless individuals, the total number of unduplicated sheltered homeless persons in Lake County in FY2019 was 1,077.

Discussion:

The Lake County Coalition of the Homeless has also recently completed its Analysis of Racial Disparity within the Homeless Services System:

As mentioned above, to assess whether there are racial disparities in the provision or outcome of homeless assistance in Lake County, the Lake County Coalition for the Homeless conducted an Analysis of Racial Disparity within the Homeless Services System. The report found that Blacks and African Americans are overrepresented in the homeless population, comprising 42.5% of the homeless population but only 7.8% of Lake County's population. The report also found that outcomes were similar for Blacks and African Americans and Whites.

- "Length of time homeless" is defined as the average amount of time that clients remain in shelter (emergency shelter, safe havens, and transitional housing) before being places in permanent housing. For Blacks and African Americans, the average length of time homeless was approximately 68 days, compared to 85 days for Whites.
- "Returns to homelessness" is defined as a household that exited homelessness to a permanent destination and subsequently returned to an emergency shelter. Of those that exited homelessness to a permanent destination, approximately 23% of Blacks or African Americans returned to homelessness within 1 year and 27% returned to homelessness within 2 years. This is similar to the rate of returns to homeless for White participants; approximately 23% returned to homelessness within 1 year and 31% returned to homelessness within 2 years. When returns to homelessness are broken down by ethnicity, again, the rates of return are similar. Hispanic and Latino participants returned to homelessness within 1 year at a rate of 22% and within 2

OMB Control No: 2506-0117 (exp. 06/30/2018)

years at a rate of 27%; Non-Hispanic or Latino clients returned to homelessness within 1 year at a rate of 23% and within 2 years at a rate of 29%.

- "Successful exits" is the rate at which households exited homelessness to a positive destination. The definition of a positive or successful exit differs depending on the clients' current situation. Positive exits from street outreach include an exit to nearly anywhere other than a place not meant for human habitation or a jail, prison, or juvenile facility. This includes exits to non-permanent destinations. For those exiting street outreach, the success rate of exits is 69% for Blacks and African Americans and 79% for Whites. Positive exits from shelter and transitional housing includes only exits to permanent destinations. For those exiting shelter and transitional housing, the percent placed permanently is 44% for Blacks and African Americans 37% for Whites. Positive or successful exits for those in permanent supportive housing includes those who remained in permanent supportive housing or exited to another permanent housing destination. For those exiting permanent housing, the success rate is 94% for Blacks and African Americans and 97% for Whites.

NA-45 Non-Homeless Special Needs Assessment - 91.405, 91.205 (b,d)

Introduction

The primary groups with non-homeless special needs in Lake County are the elderly and disabled (physical or mental). Other groups such as foreign born residents and those with limited English proficiency, and households that are otherwise low/moderate income additionally require the attention of social service providers in the County. This section will explain more about these households, their needs, and how the County is accommodating or should accommodate these individuals.

Describe the characteristics of special needs populations in your community:

Elderly

The elderly (65+) make up almost 13.7% of the Lake County Population. An increase of 3.2% since the last consolidated plan was completed five years ago. They tend to be white, female, and married or widowed at higher rates than the general US population. 23.7% of this group are disabled. 75% of this group are out of the workforce and 87.8% are receiving Social Security. 11.7% of this group live at 149% or less of the poverty rate which is approximately 11,001 people over 65 years of age with extremely limited means to maintain a healthy lifestyle. (Source: American Community Survey 2017).

Disabled

Disability is defined as having a serious hearing or vision deficit, cognitive difficulty, serious difficulty walking or managing stairs, difficulty bathing or dressing, or meaningful independent living difficulties. 8.9% of the Lake County population is considered disabled which is a 2.4% increase for this population from the time of the last consolidated plan. Of the working age adults with a disability 44% did not work in the last year of record and 25% worked only part time. Less than 1/3 of the disabled working age population maintained full time employment (31%). Working age adults who were employed earned only 71% of the area median income overall. Women in this group earned 55% of the area median income (Source: American Community Survey 2017).

Regarding behavioral health specifically, 18% of the Lake County population (approx. 126,000 people) have been diagnosed with depression. This group is 10x more likely to consider suicide which stands as the 10th highest cause of death in the County. Nationally, 19.2% of adults with a mental illness also have a substance use disorder (source: Lake County Health Dept. Statewide, 28% of Youth report feeling so sad or hopeless almost every day for two weeks or more in a row to a degree that they were stopped from doing some usual activities. Countywide, 14% of adults report having a day or more in the past

OMB Control No: 2506-0117 (exp. 06/30/2018)

month where their mental health status prevented them from carrying on usual activities **https://docs.wixstatic.com/ugd/701962_b57782774ac34abcad5efc2d2e3bfa3b.pdf**)

Other

Overall, 8.5% of Lake County residents are living below the poverty level. The percentage of low-income households has increased in the northern half of the County over the last fifteen years with 12% of the population of the northern half of the County below the poverty line (https://www.hfnlc.org/wp-content/uploads/2019/04/Community-Needs-Assessment.pdf). A large percentage of the County as a whole are foreign born (18.4%) with 28% of households speaking a language other than English in their homes (ACS 2017).

What are the housing and supportive service needs of these populations and how are these needs determined?

For all the populations noted, the number one barrier to housing is affordability.

Supportive service needs for these populations are specific to the individuals ranging from one-time assistance to support a household through a change to permanent supportive housing options for those that require it.

These determinations are made by the organizations providing the care in the community and would ideally be part of a coordinated effort that ensured every need of the individual are met.

Area studies point toward the need for improved transit options for these households as well as a better coordinated service system in general to provide a better safety net for households that experience crises.

Discuss the size and characteristics of the population with HIV/AIDS and their families within the Eligible Metropolitan Statistical Area:

A 2015 survey found approximately 916 residents in the County living with HIV and AIDS. **https://aidsvu.org/local-data/** In Illinois, on average, this population is 80% male, 47% black, 19% Hispanic and 28% white.

Discussion:

The elderly and disabled populations in Lake County are increasing at a significant rate. Low-income households and those living under the poverty level will continue to require assistance from the nonprofit and government sectors. With strategically delivered resources, the County can maximize the impact of their dollars to benefit these most in-need groups.

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

Describe the jurisdiction's need for Public Facilities:

Successful public spaces/facilities can be used create a strong sense of community and assist in overall community outreach efforts. Placemaking efforts can look to public and private spaces that incorporate elements of historic preservation, architecture, public art, street art and others. Capitalizing on these assets in LMAs should be has the potential to address community economic development needs by attracting tourists, private investment and generate an overall sense of pride within the community.

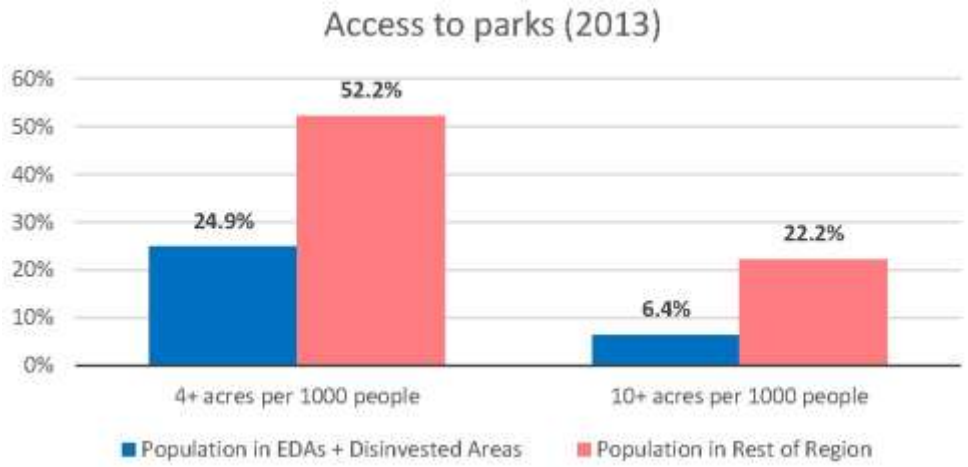
Additionally, public facilities housing nonprofits are in continual need by the community. These agencies have budgets that are often strained despite the increasing need for services. Many agencies have been forced into existing spaces not designed for their needs. Ongoing attempts to retrofit facilities to a more functional setup often get shelved due to lack of funding. Tight budgets don't allow for facility expansion, updates or improvements. The services provided by these facilities improve the overall quality of life opportunities available to County residents. The County recognizes the valued services of the non-profits and the need for public facilities.

On April 23, 2019 a summit that included representatives from many different sectors of the service delivery ecosystem in the County discussed the need for a new crisis care model in the County to provide a viable alternative to jails and emergency rooms for people in distress who are not best served by those emergency response options. People experiencing mental health and housing crises were among the population who would be considered beneficiaries of such a system. A common solution discussed with regularity during the summit was a new facility or building or renovation to an existing structure that would provide the space for such an intervention.

A significant opportunity for the Lake County Consortium is to continue support of service agencies by funding CDBG-eligible capital improvements to community public facilities.

How were these needs determined?

The needs were determined through a combination of public meetings, staff experience and interagency communication. The need for more green space and park amenities in low- and moderate-income areas was confirmed by two maps attached below: CMAP's "access to parks" indicator reveals that in 2013 24.9 percent of the population in Economically Disconnected Areas (EDAs) had access to four or more acres of parkland per 1,000 residents, compared to 52.2 percent in other areas. There is a demonstrated need to expand park access in the LMAs of Lake County. The need especially to expand green infrastructure, tree canopy and other community greening strategies that help reduce the negative impacts of climate change. The need is especially apparent in LMAs, where there are far fewer green areas, especially less access to parks.



Values are reported as % of regional population with access to at least 4 acres. CMAP, On to 2050

Describe the jurisdiction's need for Public Improvements:

Flooding is a consistent issue for Lake County. The physical geography, urban development and the relatively flat regional topography all contribute to Lake County's flooding issues. Flooding causes problems for road and rail transportation, utility outages and sewer overflows. All of which lead to personal and financial stresses for Lake County residents.

Much of the existing infrastructure was designed using standards that pre-date the increased number of heavy rain events, freeze-thaw cycles, and hotter and wetter conditions posed by a changing climate. The Lake County Watershed Development Ordinance (WDO) requires the use of the Rainfall Depth-Duration Frequency Tables for Lake County for regulatory design criteria. These rainfall amounts are used to calculate and size stormwater infrastructure such as storm sewers and detention basins. The design rainfall data are referenced from the 1989 Illinois State Water Survey Bulletin 70 publication, which is based on observed precipitation data between roughly 1901 and 1983. In March 2019, the Illinois State Water Survey released updated rainfall data for Bulletin 70, based on precipitation data from 1948 to 2017. An initial evaluation indicates that the revised rainfall amounts for Lake County are between 20% and 45% higher than those currently used. Increased frequency and intensity of rainfall events will stress existing infrastructure and represents a natural hazard risk for all Lake County residents.

How were these needs determined?

The needs were determined through a combination of public meetings, surveys, staff experience, research and interagency communication.

Describe the jurisdiction's need for Public Services:

The 2019 Community Needs Assessment focused on the Latinx community performed by service provider Mano a Mano reported a greater need for mental health counseling (52%), health services in languages other than English (31%) and drug/alcohol counseling (24%). According to this assessment, which was authored by Leading Healthy Futures, there is "increased awareness, recognition and acceptance of these issues in the community."

This study also "pointed to young adults aged 18-25 as a group of interest with particular needs that many not be adequately served," a finding repeated in the Gap Analysis of the Homeless Crisis Response system that facilities and services for youth without a home are significantly lacking.

In its preparation for introducing The Josselyn Lake County Center for Mental Health, this agency noted that 24% of its clients at its Northfield Center – a northern suburb in Cook County – were coming from Lake County.

Looking at other funding sources that support public services, Lake County noticed the need to target CDBG Public Service dollars at transportation, adaptive equipment and diversity/inclusion programming while other funding sources (e.g. Lake County Community Foundation & FEMA's Emergency Food & Shelter Program) provided basic needs funding and the non-profit segment of the health care sector receives steady support from the Healthcare Foundation of Northern Lake County. An example of a pressing public service need is the need for more public transit routes to include the Robert W. **Depke Juvenile** Justice Complex and Minard E. Hulse **Juvenile** Detention **Center** in Vernon Hills. This Complex is the only site for Lake County court cases involving children, but is difficult to reach without a car. From the eastern side of Lake County, it currently requires two hours of time each way to visit Depke.

All of these factors contribute to significant hurdles and indicate need areas that could be addressed via public services.

How were these needs determined?

An assessment of the region using studies and statistical data presented several data affecting Lake County public service needs:

As of 2017, 8.9% of the population's households used food stamps. As of this same period 6.3% of the population was unemployed and 8.1% of the population had no health insurance. About 8.7% of the population has a disability of some kind. 4.8% of the households in the County are considered to be limited-English speaking households. 9.3% of Lake County's residents are not citizens of the U.S. 5.9% of eligible adults in the County are veterans as well. 9.7% of the eligible population have less than a high school degree. https://factfinder.census.gov/faces/nav/jsf/pages/guided_search.xhtml

Additionally, 38% of the population report having at least one day per month where they felt their mental health was not good. 14% of the population felt that 8 or more days were not good. https://www.lakecountyil.gov/2822/Mental-Health

Housing Market Analysis

MA-05 Overview

Housing Market Analysis Overview:

The Chicago Metropolitan Agency for Planning (CMAP) points out that "For communities to be economically resilient in the face of changing demographics and consumer preference for denser and more walkable places, we must build and maintain the types of housing that people increasingly want." (CMAP's On To 2050 Plan booklet, p.38) The Housing Market Analysis section of this HUD Strategic Plan discusses the housing and service needs of Lake County's low-and moderate-income and special needs residents. MA-10, MA-15, and MA-20 focus on residential units in Lake County and explore the size and type of units, housing value and affordability for low-and moderate-income households, and age and condition. MA-25 focuses specifically on public housing units. MA-30 and MA-35 focus on the facilities and services available for residents experiencing homelessness and residents with special needs. MA-40 discusses barriers to affordable housing, and MA-45 explores the community's needs other than housing.

MA-10 Housing Market Analysis: Number of Housing Units - 91.410, 91.210(a)&(b)(2)

Introduction

This section provides an overview of Lake County's housing stock by type and size of unit.

All residential properties by number of units

Property Type	Number	%
1-unit detached structure	176,833	67%
1-unit, attached structure	30,320	12%
2-4 units	14,037	5%
5-19 units	20,163	8%
20 or more units	16,995	6%
Mobile Home, boat, RV, van, etc	4,574	2%
Total	***262,922***	***100%***

Table 30 – Residential Properties by Unit Number

Data Source: 2011-2015 ACS

Unit Size by Tenure

	Owners		Renters	
	Number	%	Number	%
No bedroom	327	0%	1,912	3%
1 bedroom	2,629	1%	15,542	25%
2 bedrooms	30,297	17%	25,597	41%
3 or more bedrooms	147,827	82%	19,753	31%
Total	***181,080***	***100%***	***62,804***	***100%***

Table 31 – Unit Size by Tenure

Data Source: 2011-2015 ACS

Describe the number and targeting (income level/type of family served) of units assisted with federal, state, and local programs.

Lake County assists households with housing utilizing primarily federal Community Development Block Grant (CDBG) and Housing Investment Partnership (HOME) funds. Lake County also has some local funds available through its Lake County Affordable Housing Program. These grant programs require income targeting, meaning that the funds must be used to help households at or below predetermined income levels. A household's income level is measured by how it compares to the Area Median Income (AMI), or the median income of households in the Chicago Metropolitan Statistical Area.

CDBG is intended for low- and moderate-income households, which are defined as any household with an income at or below 80% of the Area Median Income. If housing is funded with CDBG funding, at least 51% of the units must be occupied by low- and moderate-income households according to CDBG standards. The means the majority of households benefitted by CDBG funds must be at or below 80% AMI.

HOME is intended for low-income, very low-income (VLI), and extremely low-income (ELI) families, which are defined as any household with an income at or below 80% AMI, 50% AMI, and 30% AMI, respectively. 100% of units funded with HOME funding must benefit low-income households according to the HOME standards. This means 100% of beneficiaries of HOME funds must be at or below 80% AMI.

Due to the extremely high cost of housing in Lake County, AHP can create affordable housing for families up to 100% AMI.

Lake County anticipates serving roughly 800 total units, including 400 households with incomes less than or equal to 50% of the Area Median Income and 400 households with incomes less than or equal to 80% of the Area Median Income.

Provide an assessment of units expected to be lost from the affordable housing inventory for any reason, such as expiration of Section 8 contracts.

Lake County believes that the preservation of existing affordable housing units is as important as the development of new affordable housing units and accepts funding applications from low-income housing developments which would be able to maintain affordability with Affordable Housing Funding. The housing subsidies for five HUD-funded multifamily buildings (228 units) expire during this HUD Strategic Plan 2020-24 timeframe, so preservation efforts may be necessary. Shortly before this 2020-24 timeframe, Lake County successfully partnered with a for-profit developer to preserve Lilac Ledge in Waukegan as affordable housing.

Does the availability of housing units meet the needs of the population?

According to the 2010 Census General Housing Characteristics data, out of approximately 260,310 total housing units in Lake County, about 18,598 units (or 7.1%) are vacant. Units are considered vacant if they are for rent and vacant (28.7%), rented but not yet occupied (1.9%), for sale and vacant (23.1%), sold but not yet occupied (3.7%), for seasonal/recreational/ occasional use and vacant (18.2%), for migratory workers and vacant (0.1%), or other vacant (24.4%). This breaks down to a 2.3% vacancy rate for homeowner units and 8.6% vacancy rate for rental units. The US Census Bureau Current Population Survey/Housing Vacancy Survey estimates the vacancy rate for 2010 across the United States to be about 2.6 for homeowner units and 10.2 for rental units.

While the vacancy rate suggests there are available housing units, the percentage of Lake County residents who are cost-burdened or severely cost-burdened indicate that the available housing does not

OMB Control No: 2506-0117 (exp. 06/30/2018)

meet the needs of the population. As mentioned above in NA-10, the 2011-2015 ACS 5-Year Estimates data indicates that 30.6% of owner-occupants with a mortgage, 19.1% of owner-occupants without a mortgage, and 49.5% of renter-occupied households pay more than 30% of their household income in rent. Clearly there is a need for more units that are affordable, especially to low- and moderate-income households.

The high number of Lake County residents that are experiencing one or more housing problem or severe housing problem further indicate that the available housing does not meet the needs of the population.

As mentioned above, the jurisdiction as a whole experiences one or more housing problems at a rate of 79.4%, 80.8%, 54.4%, and 38.4% and one or more *severe* housing problems at a rate of 69.5%, 44.6%, 21.1%, 11.4%, for income categories of 0-30%, 30-50%, 50-80%, and 80-100%, respectively. As household income decreases, the rate of severe housing problems increases, indicating that households are forced to live with severe housing problems due to a lack of obtainable units which meet their needs.

Though it is not possible to determine from the CHAS data the percentage of Lake County residents that are experiencing substandard conditions (lacking complete plumbing or kitchen facilities), overcrowding (1.01-1.5 people per room), or severe overcrowding (more than 1.51 people per room), residents who are experiencing these housing problems do so because the available housing in the area does not meet their needs.

Describe the need for specific types of housing:

An increase in affordable housing units is needed to meet the needs of the many cost-burdened residents of Lake County, an increase in the size of units is required to meet the needs of the many households experiencing overcrowding or severe overcrowding, and an increase in the quality of the units is required to meet the needs of the many households experiencing substandard housing conditions. Seniors and people with disabilities need accessible housing units, preferably in walkable communities like Mundelein, Lake Forest and Libertyville.

Discussion

- The number of households experiencing housing problems or severe housing problems indicates that the units currently available in Lake County do not meet the needs of its residents. As recommended by the Chicago Metropolitan Agency for Planning (CMAP), local housing must match the types that residents want. (www.cmap.illinois.gov/2050/community/housing)
- CMAP's On To 2050 Plan continues, "The region's housing supply must adapt to meet global shifts and local needs that include an aging population, increasing diversity, and changing living patterns. As demographics change, so does the type and location of the housing that people want. Research found that the market can be impeded from meeting such changes in demand by various barriers, including both the community's lack of alignment between planning, zoning,

OMB Control No: 2506-0117 (exp. 06/30/2018)

and approvals processes and the extent to which its residents accept proposed housing developments."

MA-15 Housing Market Analysis: Cost of Housing - 91.410, 91.210(a)

Introduction

In its 2016 housing report, the Joint Center for Housing Studies at Harvard University projected that the percentage of severely cost-burdened households will increase 11 percent by 2025. This section reviews actual housing costs in Lake County and compares these to the HUD HOME rent limits, which are the maximum rents allowable for units subsidized with HOME Investment Partnerships funding.

Cost of Housing

	Base Year: 2000	Most Recent Year: 2015	% Change
Median Home Value	198,200	245,300	24%
Median Contract Rent	742	927	25%

Table 32 – Cost of Housing

Alternate Data Source Name:
2000 Census (Manually Input)
Data Source Comments:

Rent Paid	Number	%
Less than $500	8,625	13.7%
$500-999	28,188	44.9%
$1,000-1,499	17,348	27.6%
$1,500-1,999	5,282	8.4%
$2,000 or more	3,257	5.2%
Total	***62,700***	***99.9%***

Table 33 - Rent Paid

Data Source: 2011-2015 ACS

Housing Affordability

% Units affordable to Households earning	Renter	Owner
30% HAMFI	4,574	No Data
50% HAMFI	14,438	11,251
80% HAMFI	37,787	33,634
100% HAMFI	No Data	50,939
Total	***56,799***	***95,824***

Table 34 – Housing Affordability

Data Source: 2011-2015 CHAS

Monthly Rent

Monthly Rent ($)	Efficiency (no bedroom)	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom
Fair Market Rent	879	1,014	1,180	1,501	1,794
High HOME Rent	879	1,014	1,180	1,420	1,564
Low HOME Rent	741	793	952	1,100	1,227

Table 35 – Monthly Rent

Data Source: HUD FMR and HOME Rents

Is there sufficient housing for households at all income levels?

As discussed in MA-10 above, the percentage of Lake County residents who are cost-burdened or severely cost-burdened indicate that the available housing does not meet the needs of the population. The 2011-2015 ACS 5-Year Estimates data indicates that 30.6% of owner-occupants with a mortgage, 19.7% of owner-occupants without a mortgage, and 49.5% of renter-occupied households pay more than 30% of their household income in rent. Clearly there is a need for more units that are affordable, especially to low- and moderate-income households.

Additionally, Lake County as a whole experiences one or more housing problems at a rate of 79.4%, 80.8%, 54.4%, and 38.4% and one or more *severe* housing problems at a rate of 69.5%, 44.6%, 21.1%, 11.4%, for income categories of 0-30%, 30-50%, 50-80%, and 80-100%, respectively. As household income decreases, the rate of severe housing problems increases, indicating that households are forced to live with severe housing problems such as substandard conditions and severe overcrowding due to a lack of affordable units which are sufficient for their needs.

How is affordability of housing likely to change considering changes to home values and/or rents?

From 2000 to 2015, Lake County's median home value increased 23.8%, from $198,200 to $245,300, and the median contract rent increased 24.9%, from $742 to $927. Over the same period, median income increased only 16.5%, from $66,973 in 2000 to 78,026 in 2015 (ACS 2011-2015 5-Year Estimates). This indicates that housing cost burden has increased over the past 15 years. If housing costs continue to rise at a rate faster than increases in household income, housing affordability will continue to be a problem in Lake County.

How do HOME rents / Fair Market Rent compare to Area Median Rent? How might this impact your strategy to produce or preserve affordable housing?

HUD determines the High HOME rent by calculating the amount a household earning 65% of the Area Median Income could pay for housing costs without being cost burdened (>30% household income on

housing). Similarly, the Low HOME rent is determined by the amount a household with income at 50% of the Area Median Income could afford for housing costs.

The High and Low HOME rent limits are the maximum limits for housing costs including utilities. Median Contract Rent is based on the amount that is paid for **rent only,** though the cost of rent may include utilities paid by the landlord. The Median Gross Rent includes the cost of **rent plus utilities** that must be paid by the tenant. While the Median Contract Rent for Lake County in 2015 was $927, the Median Gross Rent was $1,069. When comparing the HOME rents to the area's Median Rent, which includes utilities, it is important to use the American Community Survey's Gross Rent figure, which also includes utilities. The *Monthly Rent* table above represents 2018 HOME limits; as the median gross rent in the *Cost of Housing* table utilizes 2015 Median Contract Rents, this narrative refers to the 2015 HOME rent limits to ensure accurate comparison.

In 2015, the Median Gross Rent was $1,069, the High HOME Rent for a 2 bedroom was $1,093, and the Low HOME rent for a 2 bedroom was $855. As the Median Rent is above the Low HOME limits, a very low-income family at 50% AMI would not be able to afford a 2-bedroom unit and would be even further cost burdened if they needed a larger unit. A low-income family at 65% AMI would barely be able to afford a 2-bedroom unit. This indicates that housing is not affordable on the open market and that affordable housing must be solved for with subsidies and other interventions.

Discussion

Actual housing costs in Lake County exceed the amounts that would be affordable for low, very low, and extremely low-income households. As housing costs continue to increase at a rate faster than household incomes increase, Lake County residents will continue to be cost burdened. Additionally, as income decreases, the prevalence of severe housing problems increases, indicating that the lack of affordable housing increases the likelihood that households will reside in homes with severe housing problems, such as substandard kitchen or plumbing facilities or severe overcrowding.

MA-20 Housing Market Analysis: Condition of Housing - 91.410, 91.210(a)

Introduction

The tables below provide details of Lake County's housing stock including the numbers with selected conditions, age of units, and risk of lead-based paint hazard.

The *Condition of Units* table is based on 2011-2015 American Community Survey data. There are four "selected conditions," including lack complete kitchen facilities, lacks complete plumbing facilities, more than one person per room, and cost burden greater than 30%. These housing problems are discussed in further detail in the Needs Assessment sections above, particularly sections NA-10, NA-15, NA-20, NA-25, and NA-30.

Describe the jurisdiction's definition for "substandard condition" and "substandard condition but suitable for rehabilitation:

The Lake County Planning, Building and Development Department regulates building construction, safety, and maintenance in unincorporated areas of Lake County. For residential buildings, the Lake County Board has adopted the 2012 International Residential Code for one-family and two-family structures and the 2012 International Building Code for multifamily dwellings. All structures must be maintained in accordance with the BOCA National Property Maintenance Code/1993, plus for unincorporated Lake County, "It is a public nuisance to rent or lease quarters for human habitation that, as determined by the Health Officer, are unfit for human habitation, or present/contain conditions that are detrimental to the health of the inhabitants, including but not limited to: a lack of potable water supply or a lack of adequate means of wastewater disposal." In other words, Lake County government mandates that housing in the unincorporated areas have running water and wastewater systems. The municipalities within Lake County have each adopted various versions of the International Building Codes for residential structures.

While there is no single definition for "substandard condition," Lake County will only utilize HUD HOME, CDBG, or NSP funds on rehabilitation if the rehabilitation work will bring the unit up to the standards described in the Lake County Consortium Property Rehabilitation Standards document. Furthermore, the property must be able to be brought up to the standards described while remaining under the limits proscribed by HUD, including the Maximum Per-Unit Subsidy and HOME Homeownership Value Limits. The Lake County Consortium Property Rehabilitation Standards incorporate various codes, regulations, standards, and guidelines, including, but not limited to, the 2012 International Property Maintenance Code, State and local codes and ordinances, the Uniform Physical Condition Standards (UPCS) of the Department of Housing and Urban Development, and regulation on Lead-Based Paint Hazards in Federally-Owned Housing and Housing Receiving Federal Assistance.

OMB Control No: 2506-0117 (exp. 06/30/2018)

Condition of Units

Condition of Units	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
With one selected Condition	54,320	30%	28,217	45%
With two selected Conditions	1,385	1%	2,311	4%
With three selected Conditions	34	0%	145	0%
With four selected Conditions	0	0%	0	0%
No selected Conditions	125,292	69%	32,100	51%
Total	***181,031***	***100%***	***62,773***	***100%***

Table 36 - Condition of Units

Data Source: 2011-2015 ACS

Year Unit Built

Year Unit Built	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
2000 or later	29,559	16%	9,037	14%
1980-1999	67,149	37%	19,093	30%
1950-1979	64,328	36%	25,085	40%
Before 1950	20,037	11%	9,561	15%
Total	***181,073***	***100%***	***62,776***	***99%***

Table 37 – Year Unit Built

Data Source: 2011-2015 CHAS

Risk of Lead-Based Paint Hazard

Risk of Lead-Based Paint Hazard	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
Total Number of Units Built Before 1980	84,365	47%	34,646	55%
Housing Units build before 1980 with children present	22,843	13%	16,282	26%

Table 38 – Risk of Lead-Based Paint

Data Source: 2011-2015 ACS (Total Units) 2011-2015 CHAS (Units with Children present)

Vacant Units

	Suitable for Rehabilitation	Not Suitable for Rehabilitation	Total
Vacant Units	18,598	0	18,598
Abandoned Vacant Units	3,288	0	3,288
REO Properties	371	0	371
Abandoned REO Properties	57	0	57

Table 39 - Vacant Units

Alternate Data Source Name:
ATTOM Data
Data Source Comments: *Vacant Units based on 2010 Census. **Abandoned Vacant Units, REO Properties, and Abandoned REO Properties based on ATTOM Data

Describe the need for owner and rental rehabilitation based on the condition of the jurisdiction's housing.

As indicated in the "Year Unit Built" table above, the vast majority of Lake County's housing stock is more than 20 years old, 84% of owner-occupied units and 85% of renter-occupied units were built prior to 2000. Renter-occupied housing stock seems to trend even older, as most of it is based in older communities, with 55% of renter-occupied units built prior to 1980, compared to 47% for owner-occupied units.

Lake County recognizes that the creation of affordable housing requires both the preservation of existing housing stock and the development of new units. There is a long waiting list at the Community Partners for Affordable Housing for Lake County's owner-occupied rehab program, indicating high need for that proven housing program.

Estimate the number of housing units within the jurisdiction that are occupied by low or moderate income families that contain lead-based paint hazards. 91.205(e), 91.405

HUD considers units built prior to 1980 to have a risk of lead-based paint hazards. According to the Centers for Disease Control and Prevention, lead-based paints were banned for use in housing in 1978, so home built prior to then are likely to contain the substance, which becomes a health hazard as it deteriorates and turns to dust.

Renter-occupied homes are more likely to be built prior to 1980. 55% of renter-occupied units were built prior to 1980, compared to 47% for owner-occupied units. Extremely low-income families are more likely to occupy rental units. According to the 2011-2015 CHAS, as household income increases, so does the likelihood a household will own. 62% of households with incomes less than or equal to 30% AMI are renters, and this percentage drops as income increases. The percentage of households that **rent** at less than 30% AMI, 30-50% AMI, 50-80% AMI, 80-100% AMI, and greater than 100% AMI is 62%, 49%, 35%, 28%, and 12%, respectively. Only 38% of households with incomes less than or equal to 30% AMI are owners, and this percentage increases as incomes increase. The percentage of households that **own** at less than 30% AMI, 30-50% AMI, 50-80% AMI, 80-100% AMI, and greater than 100% AMI is 38%, 51%, 65%, 72%, and 88%, respectively.

Discussion

The demand for rehabilitation may be impacted by the high number of homes that were built prior to the year 2000. High quality rehabilitation work is especially crucial for the 55% of renter-occupied units and 47% of owner-occupied units that were built prior to 1980, as they are likely to have lead-based

OMB Control No: 2506-0117 (exp. 06/30/2018)

paint. As extremely low-income households are more likely to occupy rental units, and rental units are more likely to be built prior to 1980, the risks posed by lead-based paint may be disproportionately affecting households with incomes less than 30% of the Area Median Income.

MA-25 Public And Assisted Housing - 91.410, 91.210(b)

Introduction

Lake County has three public housing agencies: Lake County Housing Authority (LCHA), Waukegan Housing Authority (WHA), and North Chicago Housing Authority (NCHA). All three housing authorities have public housing developments and also administer housing choice vouchers.

Totals Number of Units

Program Type									
	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project -based	Tenant -based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
# of units vouchers available	0	0	620	2,803	231	2,572	0	93	0
# of accessible units									
***includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition**									

Table 40 – Total Number of Units by Program Type

Data Source: PIC (PIH Information Center)

Describe the supply of public housing developments:

Describe the number and physical condition of public housing units in the jurisdiction, including those that are participating in an approved Public Housing Agency Plan:

Lake County Housing Authority owns and operates 332 units of public housing for seniors and individuals with disabilities and 161 single family homes, Waukegan Housing Authority maintains 448 public housing units, and North Chicago Housing Authority manages 150 public housing units.

OMB Control No: 2506-0117 (exp. 06/30/2018)

Public Housing Condition

Public Housing Development	Average Inspection Score
Beach Haven Tower	99
Scattered Sites	97
Barwell Manor Homes	93
Harry A. Poe Manor Home	93
Scattered Sites 2	93
Armory Terrace Homes	71
Ravine Terrace Homes	68
North Chicago	62

Table 41 - Public Housing Condition

Describe the restoration and revitalization needs of public housing units in the jurisdiction:

Due to the age of some of the public housing developments in Lake County, public housing authorities have been exploring redevelopment options. LCHA continues progress on the Marion Jones redevelopment in North Chicago. The Brookstone and Regency at Coles Park projects, totaling 220 units, will include amenities such as a community center, meeting space, and playgrounds. During a recent physical needs assessment, WHA determined that several building systems at Barwell Manor Homes have passed their useful life expectancy. WHA plans to redevelop the 120-unit property as part of a Rental Assistance Demonstration conversion project.

Describe the public housing agency's strategy for improving the living environment of low- and moderate-income families residing in public housing:

Lake County Housing Authority is committed to serving the community and offers many opportunities in addition to rental assistance. In addition to operating a Family Self-Sufficiency Program, Lake County Housing Authority organizes enrichment opportunities such as summer camps and trips and hosts events such as family fitness nights, picnics, and luncheons. Waukegan Housing Authority also organizes events such as a free farmers markets and annual block parties.

Discussion:

Public housing agencies are important partners in the preservation and development of quality affordable housing and Lake County welcomes and encourages collaboration between public housing agencies and other organizations that help Lake County residents in need.

MA-30 Homeless Facilities and Services - 91.410, 91.210(c)

Introduction

The front door of Lake County's homeless service system is PADS Lake County, which operates a rotating night-by-night shelter in houses of worship throughout the County. PADS' Resource Center offers daily services, including intake, counseling, group therapy and referrals. The Resource Center is located at 1800 Grand Ave in Waukegan, a busy commercial district featuring several bus routes. Most importantly, PADS and other homeless service providers offer intake to Coordinated Entry, the system for prioritizing clients for housing vacancies based on need. Coordinated Entry is collectively operated by the Lake County Coalition for the Homeless and staffed by Lake County Community Development.

Facilities Targeted to Homeless Persons

	Emergency Shelter Beds		Transitional Housing Beds	Permanent Supportive Housing Beds	
	Year Round Beds (Current & New)	Voucher / Seasonal / Overflow Beds	Current & New	Current & New	Under Development
Households with Adult(s) and Child(ren)	2	20	66	37	0
Households with Only Adults	8	80	30	143	2
Chronically Homeless Households	0	0	0	180	2
Veterans	0	0	0	0	0
Unaccompanied Youth	0	0	0	0	0

Table 42 - Facilities Targeted to Homeless Persons

Data Source Comments: CoC Housing Inventory Count.

OMB Control No: 2506-0117 (exp. 06/30/2018)

Describe mainstream services, such as health, mental health, and employment services to the extent those services are use to complement services targeted to homeless persons

The Lake County Health Department (LCHD) and Erie Health Systems both operate federally-qualified health centers in Lake County. LCHD provides medical, dental and mental health services at seven health centers throughout the county. The Behavioral Health Service Area provides treatment, training and support to persons experiencing problems related to severe emotional and mental illness as well as those experience drug and alcohol addiction issues. Erie Healthreach offers a similar array of services but to a lesser extent at their one facility located in Waukegan. As FQHC's these centers are required to provide services to individuals regardless of their ability to pay which is a benefit to the homeless population.

List and describe services and facilities that meet the needs of homeless persons, particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth. If the services and facilities are listed on screen SP-40 Institutional Delivery Structure or screen MA-35 Special Needs Facilities and Services, describe how these facilities and services specifically address the needs of these populations.

A person falling into homelessness will likely begin their path back to housing at the nonprofit PADS. PADS operates a rotating site shelter using donated space and volunteers from area religious institutions. This shelter system operates from October 1 to April 30 and averages 90 beds each night. The PADS shelter does not maintain a waiting list and has few entry requirements. From PADS, homeless individuals and families will be directed to other opportunities as they become available including transitional housing, rapid rehousing or permanent supportive housing depending on their situation.

Other shelters in Lake County include the Lake County Haven's 10-bed facility for single women or women with children. Most Individuals and families fleeing domestic violence access services through A Safe Place's crisis line. A Safe Place (28 beds) and Most Blessed Trinity, overseen by Catholic Charities (24 beds) operate shelters for survivors of domestic violence. Waukegan Township also runs two facilities that operate as shelters called the Eddie Washington Center (17 beds) and Staben house (18 beds). The Lovell Federal Health Center operates a 62-bed domiciliary that serves homeless veterans from Lake County and surrounding areas.

Catholic Charities and Maristella operate motel voucher programs that serve homeless individuals and families.

MA-35 Special Needs Facilities and Services - 91.410, 91.210(d)

Introduction

This section discusses special needs facilities and services in Lake County.

Including the elderly, frail elderly, persons with disabilities (mental, physical, developmental), persons with alcohol or other drug addictions, persons with HIV/AIDS and their families, public housing residents and any other categories the jurisdiction may specify, and describe their supportive housing needs

- The elderly and frail elderly populations are growing in the County. Many of these individuals wish to remain in their homes for as long as possible, while challenges related to affordability, accessibility, and poor linkages to health services may make doing so difficult. (source: HUD **https://www.huduser.gov/portal/periodicals/em/summer17/highlight1.html**) This group requires affordable housing options as their numbers grow and their incomes remain stagnant or decrease. These households will require greater and greater levels of support from their families and from public sources as they age. These services include transportation, housing modifications and case/care management (source: AARP **https://assets.aarp.org/rgcenter/ppi/liv-com/i38-strategies.pdf**).
- People with disabilities comprise a population that has also seen growth in Lake County over the past five years. The needs of this population mirror those of the elderly population in that they are specific to each person, varied and in greater demand. People with physical disabilities require homes that are modified to adapt to their specific disability. People managing mental and developmental conditions that impact housing require supports that are sometimes physical but often are service oriented such as transportation, nursing care and case/care management.
- Persons managing an alcohol or drug addiction require housing situations that reduce the likelihood of returning to their addictions. This is sometimes called "straight housing". Sometimes these situations are communal environments that include other people dealing with addiction. The supports needed include counseling and affordability primarily in addition to an environment that has as few triggers to return to their substance of choice as possible. (source: NPR **https://www.npr.org/news/specials/housingfirst/whoneeds/substanceabuse.html**)
- Regarding people with HIV/AIDS, "With safe, decent, and affordable housing, people with HIV are better able to access comprehensive health care and supportive services, get on HIV treatment, take their HV medication consistently, and see their health care provider regularly.

(source: HIV.gov **https://www.hiv.gov/hiv-basics/living-well-with-hiv/taking-care-of-yourself/housing-and-health**)"

- Public Housing residents face a lack of options as "Additional public housing has not been built in decades. Advocates are thus focused primarily on preserving the public housing stock that remains. Issues facing today's public housing include: generally well-run public housing agencies facing significant federal funding shortfalls; policies like demolition, disposition and the HOPE VI program that have resulted in the nationwide loss of public housing units; and calls for deregulation of public housing, through the expansion of the Moving to Work demonstration program and other efforts, that come at the expense of affordability, deep income targeting, resident participation, and programmatic accountability (source: NLIHC **https://nlihc.org/explore-issues/housing-programs/public-housing**)"

Describe programs for ensuring that persons returning from mental and physical health institutions receive appropriate supportive housing

People returning from mental and physical health institutions are likely returning to the homes they lived in prior to their admission at one of these facilities. Often substance abuse recovery homes and/or Oxford Houses are used by people exiting facilities where they had substance abuse treatment. Lake County Health Department has several respite beds, recovery beds and long-term supportive units. Reportedly it is hard to find a bed, and people often seek beds in Cook County. There are approximately 24 skilled nursing facilities in the County that can provide long-term care for individuals existing institutions. These facilities have specific intake requirements including age, insurance and level of care. (www.caring.com)

Long-term supportive housing is limited in Lake County and focused on people meeting the HUD definition of homeless. There is substantial need for supportive housing for both homeless and non-homeless (literally), so a Pay for Success financing methodology is being explored, particularly with Justice sector partners who could see declines in jail population when sufficient supportive housing beds are created.

Specify the activities that the jurisdiction plans to undertake during the next year to address the housing and supportive services needs identified in accordance with 91.215(e) with respect to persons who are not homeless but have other special needs. Link to one-year goals. 91.315(e)

- Subsidize creation of permanent supportive housing for special needs populations, especially by developers who bring supportive services to promote self-sufficient residents.
- Address transit needs in low-income areas
- Support programs that create affordable housing

- Increase capacity of supportive housing services to be everywhere that special needs housing is needed in the County.

For entitlement/consortia grantees: Specify the activities that the jurisdiction plans to undertake during the next year to address the housing and supportive services needs identified in accordance with 91.215(e) with respect to persons who are not homeless but have other special needs. Link to one-year goals. (91.220(2))

- Subsidize creation of permanent supportive housing for special needs populations, especially by developers who bring supportive services to promote self-sufficient residents.
- Address transit needs in low-income areas
- Support programs that create affordable housing
- Increase capacity of supportive housing services to be everywhere that special needs housing is needed in the County.

MA-40 Barriers to Affordable Housing - 91.410, 91.210(e)

Describe any negative effects of public policies on affordable housing and residential investment

Public policy at the local land use level has the potential to significantly impact the availability of affordable housing. Lake County's 2014 Analysis of Impediments to Fair Housing Choice ("AI") initially identified 20 impediments to fair housing choice, many of which overlap with this section. For instance, Impediment 4, "Zoning laws can limit the number of housing options for members of the protected classes," describes how local policies may negatively affect the availability of affordable housing. In Lake County's 2020 AI Update, it was found that 13 of the original 20 impediments still remain. These remaining 13 impediments, including Impediment 4, are listed below along with the often numerous stakeholders required to remove those impediments. Strategies to address these impediments are discussed below in section SP-55, Strategic Plan to Address Barriers to Affordable Housing.

The 2020 AI Update also found that since 2014, many studies have identified zoning and land-use planning as key contributors to lack of housing affordability. George Mason University reviewed the literature and found that most studies show that "both traditional land-use policies…increase the cost of housing." (www.mercatus.org/system/files/Ikeda-Land-Use-Regulation.pdf)

In 2017, the Yale Law Journal published valuable historical context explaining how past land use decisions resulted in "residential stagnation" of disenfranchised populations: "Starting in the 1970s, the combined effect of land-use restrictions in many of the richest metropolitan areas stopped that convergence in its tracks. Though doctors, lawyers and other high-skilled individuals who could afford the higher housing costs could still move to capture higher wagers in richer, restrictive states, less-skilled workers could not." (Schleicher, David. **The Yale Law Journal**. 10/17, Volume 127, #1, p. 78 – 154.)

Relevant to suburban areas like Lake County, the Urban Land Institute's 2016 report, "Housing in the Evolving American Suburb," noted that "considerable evidence indicates that zoning practices common in suburbs, and practiced in many cities as well, limit residential density and require multiple levels of local approval and thereby contribute to racial and economic segregation. (www.urbanland.uli.org)

In terms of access to existing affordable housing units, discrimination can limit the availability of units to low-income renters. Under federal law, housing providers may not discriminate based on race, color, religion, gender, national original, familial states, or disability. Under Illinois law, housing providers further cannot discriminate based on ancestry, age, military or military discharge status, marital status, protective order status, or sexual orientation. There are, however, forms of discrimination that are not forbidden under federal or state law. According to the American Bar Association, Source of Income (SOI) discrimination refers to the practice of refusing to rent a housing unit to an applicant because of that individual's lawful form of income, including Housing Choice Vouchers (HCVs). In order to increase the availability of private units available housing choice voucher holders, states and home rule local governments can pass laws to prohibit discrimination based on Source of Income – Cook County has

such a law. Since Lake County is not a home rule county, it would require a new Illinois state law to prohibit SOI discrimination here. This may limit the ability of renters holding housing choice vouchers to find quality housing in Lake County.

Table A: Thirteen Remaining Impediments With Entity Types Most Likely to Implement Solution(s)

#	IMPEDIMENT TO FAIR HOUSING CHOICE	County	Municipalities	Fair Housing Agency	Housing Authorities	Regional Transit	Regional Lenders	Regional Employers
1	The County does not have a comprehensive, long-term strategy for fair housing education for existing residents, potential residents, businesses and officials in the County. Consequently, there is lack of awareness of fair housing laws.	X		X				
3	Developments that require approval from the County or municipalities are not asked to demonstrate any actions to affirmatively further fair housing.	X	X					
4	Zoning laws can limit the number of housing options for members of the protected classes.	X	X					
11	It is difficult to ascertain if households have equal access to public housing and Housing Choice Vouchers.	X		X	X			
12	Public transportation is not accessible by all County residents, in particular seniors and persons with disabilities.					X		
13	County information should expand its affirmative marketing materials.	X						
14	The cost of both purchasing and renting housing in the County is relatively unaffordable for racial and ethnic minorities.	X	X					
15	Racial and ethnic minorities are denied home purchase mortgages at a higher rate than white applicants.						X	
16	Housing designated for moderate- and low-income families is concentrated in certain communities, not spread throughout the County.	X	X					
17	"Fair housing" and "affordable housing" may often by used interchangeably by individuals in the private and public sectors.	X	X	X		X	X	
18	Protected classes may not have equal access to housing opportunities.	X	X					
19	There is limited understanding of federal and state protected classes, in particular of persons with a disability.	X		X				
20	Throughout the County, there is a strong housing-jobs-transit mismatch.	X	X		X	X		X

This **2020 AI Update** would not be complete without a discussion of 2014 action steps still pending plus the addition of new potential action steps that have surfaced since 2014. In the following two tables, both initial and newly suggested action steps are organized by Impediment with a nod to various entities that are most likely to implement one or more proposed solutions.

LAKE COUNTY, IL ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE (AI) 2020 UPDATE

Impediments to Fair Housing Choice Remaining in 2020 AI Update

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

Introduction

This section provides insight into the economic development landscape within Lake County. The table just below details the extent of business sector employment throughout the County. Unemployment, commuting times, and education are then considered.

Economic Development Market Analysis

Business Activity

Business by Sector	Number of Workers	Number of Jobs	Share of Workers %	Share of Jobs %	Jobs less workers %
Agriculture, Mining, Oil & Gas Extraction	500	563	0	0	0
Arts, Entertainment, Accommodations	26,164	25,853	11	11	0
Construction	9,906	10,828	4	4	0
Education and Health Care Services	36,759	34,907	16	14	-2
Finance, Insurance, and Real Estate	18,914	17,874	8	7	-1
Information	5,032	3,383	2	1	-1
Manufacturing	35,976	48,643	15	20	5
Other Services	9,315	8,307	4	3	-1
Professional, Scientific, Management Services	34,211	30,412	14	13	-1
Public Administration	0	0	0	0	0
Retail Trade	32,366	36,153	14	15	1
Transportation and Warehousing	7,918	4,123	3	2	-1
Wholesale Trade	19,513	20,423	8	8	0
Total	236,574	241,469	--	--	--

Table 43 - Business Activity

Data Source: 2011-2015 ACS (Workers), 2015 Longitudinal Employer-Household Dynamics (Jobs)

OMB Control No: 2506-0117 (exp. 06/30/2018)

OMB Control No: 2506-0117 (exp. 06/30/2018)

Description	Industry % of Jobs	2020 Jobs	Payrolled Business Locations	Avg. Earnings Per Job
Government	15.0%	54,622	333	$79,623
Manufacturing	14.7%	53,446	1,035	$156,052
Retail Trade	11.1%	40,339	2,002	$57,636
Health Care and Social Assistance	8.7%	31,677	1,734	$67,454
Waste Management and Remediation Services	7.9%	28,851	1,404	$66,385
Accommodation and Food Services	7.6%	27,527	1,476	$23,976
Wholesale Trade	5.8%	21,046	1,346	$133,566
Professional, Scientific, and Technical Services	5.6%	20,500	3,111	$117,482
Finance and Insurance	4.8%	17,384	1,031	$117,618
Construction	3.8%	13,950	2,026	$88,799
Other Services (except Public Administration)	3.4%	12,238	2,055	$41,038
Management of Companies and Enterprises	2.9%	10,372	96	$174,378
Transportation and Warehousing	2.1%	7,790	662	$54,595
Educational Services	2.1%	7,650	317	$39,673
Arts, Entertainment, and Recreation	1.8%	6,698	354	$98,081
Real Estate and Rental and Leasing	1.1%	3,932	775	$84,054
Information	0.8%	2,974	255	$93,389
Utilities	0.5%	1,688	18	$196,759
Agriculture, Forestry, Fishing and Hunting	0.1%	477	55	$42,038
Mining, Quarrying, and Oil and Gas Extraction	0.0%	102	7	$115,626
Unclassified Industry	0.0%	19	82	$63,139
		363,284	20,170	$90,651

o

EMSI Labor Industry Data: 2020

OMB Control No: 2506-0117 (exp. 06/30/2018)

Labor Force

Total Population in the Civilian Labor Force	324,018
Civilian Employed Population 16 years and over	299,792
Unemployment Rate	7.46
Unemployment Rate for Ages 16-24	17.32
Unemployment Rate for Ages 25-65	4.99

Table 44 - Labor Force

Data Source: 2011-2015 ACS

Occupations by Sector	Number of People
Management, business and financial	95,834
Farming, fisheries and forestry occupations	11,739
Service	23,579
Sales and office	78,209
Construction, extraction, maintenance and repair	16,580
Production, transportation and material moving	13,537

Table 45 – Occupations by Sector

Data Source: 2011-2015 ACS

Travel Time

Travel Time	Number	Percentage
< 30 Minutes	150,553	53%
30-59 Minutes	97,424	34%
60 or More Minutes	37,377	13%
Total	***285,354***	***100%***

Table 46 - Travel Time

Data Source: 2011-2015 ACS

Education:

Educational Attainment by Employment Status (Population 16 and Older)

Educational Attainment	In Labor Force		
	Civilian Employed	Unemployed	Not in Labor Force
Less than high school graduate	15,606	1,871	7,018

Educational Attainment	In Labor Force		
	Civilian Employed	Unemployed	Not in Labor Force
High school graduate (includes equivalency)	42,312	4,816	12,598
Some college or Associate's degree	62,537	4,718	14,012
Bachelor's degree or higher	129,344	4,935	23,496

Table 47 - Educational Attainment by Employment Status

Data Source: 2011-2015 ACS

Educational Attainment by Age

	Age				
	18–24 yrs	25–34 yrs	35–44 yrs	45–65 yrs	65+ yrs
Less than 9th grade	499	2,406	3,724	5,868	3,973
9th to 12th grade, no diploma	5,936	3,291	3,454	5,751	4,189
High school graduate, GED, or alternative	19,845	12,948	14,631	32,443	21,182
Some college, no degree	21,391	13,629	12,849	34,734	14,633
Associate's degree	2,884	4,890	4,825	12,004	3,205
Bachelor's degree	7,343	18,737	24,729	50,999	15,448
Graduate or professional degree	471	8,757	17,675	37,588	13,150

Table 48 - Educational Attainment by Age

Data Source: 2011-2015 ACS

Educational Attainment – Median Earnings in the Past 12 Months

Educational Attainment	Median Earnings in the Past 12 Months
Less than high school graduate	1,671,346
High school graduate (includes equivalency)	3,585,263
Some college or Associate's degree	4,523,522
Bachelor's degree	7,602,313
Graduate or professional degree	9,736,693

Table 49 – Median Earnings in the Past 12 Months

Data Source: 2011-2015 ACS

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

According to EMSI, government provides the highest percentage of all jobs (15%) with manufacturing a close second (14.7%). As can be seen in the table above, these leading sectors are followed by Health

Care (8.7%), Waste Management (7.9%) and Hotel/Food (7.6%). The sector with the highest number of payrolled business locations is Professional, Scientific and Technical Services.

Describe the workforce and infrastructure needs of the business community:

A needs assessment completed as part of the 2017 Lake County Workforce Plan identified 3 areas that stand out for training investment; computer support, healthcare and manufacturing. These are industries with projected growth or occupations expected to expand.

Computer support

Professional, Scientific and Technical Services includes quite a few occupations with higher median hourly earnings; for example, both Computer User Support Specialists and Computer Network Support Specialists are expected to grow, require moderate education (less than a bachelor's degree) and have median earnings of more than $25 per hour. Job gains predicted in other large and growing industries, including Credit Intermediation and Related Activities and Management of Companies and Enterprises, require only moderate education but pay higher hourly wages are also covered by these two occupations. All of these industries are slightly concentrated in Lake County as compared to the rest of the nation.

Healthcare

Several healthcare industries are projected to grow in Lake County – Ambulatory Health Care Services, Hospitals and Nursing and Residential Care Facilities. These industries include a range of occupations, including low-wage occupations like Home Health Aides and Nursing Assistants, mid-wage occupations like Licensed Practical and Vocational Nurses and higher-wage occupations like Registered Nurses. All of these occupations are forecasted to see gains in Lake County, pointing to the potential for a career pathway in nursing.

Manufacturing

The large and growing manufacturing industries suggest a promising area of focus. There are several occupations in these industries, that are expected to grow, require moderate education and provide median earnings of more than $25 per hour. Many of these are in Medical Equipment and Supplies Manufacturing, which have a specialization in Lake County and the added benefit that the industry likely brings high economic benefit into the County. The largest employers in this field are Baxter Healthcare Corp, Baxter International, Inc. and Abbott Laboratories.

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

In spring of 2019, a two-year reverse-commute pilot project funded by a public-private partnership between Metra and Lake County businesses and governments was announced. The project is designed to make it easier to reside in Chicago while working in Lake County. The expansion of service will help local business recruit top talent to Lake County, while also reducing pollution and roadway congestion.

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

In general Lake County has a highly educated workforce population, with 44 percent of adults holding a bachelor's degree or higher, compared to 31 percent across the state and 29 percent nationally. Even so, this leaves 25 percent of Lake County residents with some college or an associate's degree, 21 percent with only a high school diploma and 10percent with less than a 12th-grade education. This distribution is not expected to change significantly in the next five years. This is concerning given the growing number of jobs that will require a college degree or certificate putting individuals with limited education and a lack of basic skills at a serious disadvantage in a labor market. The numbers indicate that race and/or ethnicity play a limiting role in education.

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

Lake County Workforce has partnered with the local economic development group, Lake County Partners (LCP), to provide Business Service Outreach. LCP is responsible for serving as the official greeter to local employers and providing referrals back to Lake County Workforce as appropriate from interactions/conversations. These services will continue to expand to include additional partners and stakeholders including the local community college, College of Lake County.

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

No

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

Lake County does not have a current, County specific, Comprehensive Economic Development Strategy (CEDS). Regionally, the Chicago Metropolitan Agency for Planning (CMAP) "On to 2050" encompasses Lake County.

The CMAP comprehensive regional plan "On to 2050" identifies "Inclusive Growth" as a clear, overarching principle. "Regions that offer economic opportunity for residents regardless of race,

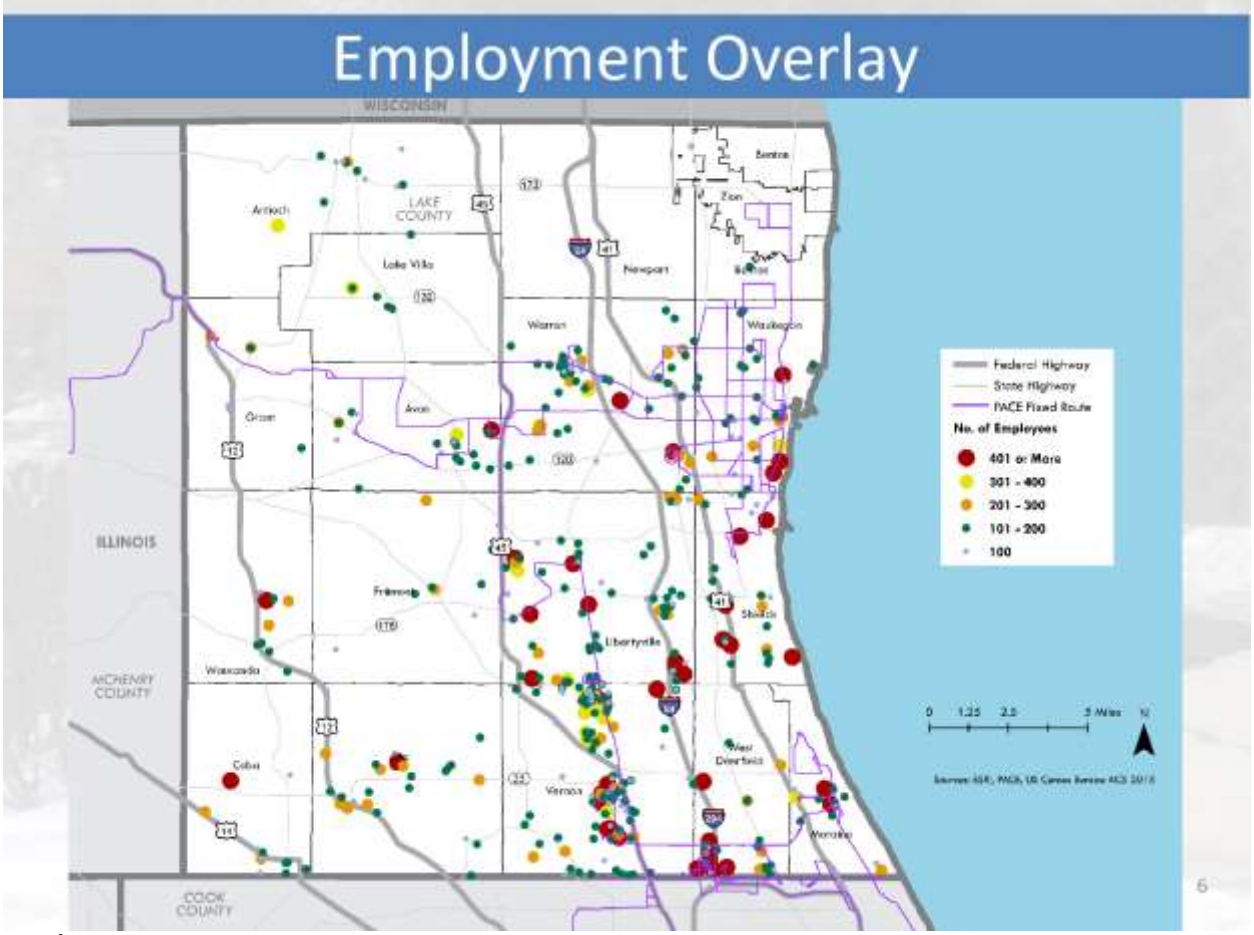
OMB Control No: 2506-0117 (exp. 06/30/2018)

income, or background enjoy longer, stronger periods of prosperity and fewer, shorter periods of economic stagnation" (CMAP). Lake County understands that despite a relatively good economic position, Lake County is falling short of creating equal economic opportunity for all residents. The data indicates that economic success is limited by factors of race or ethnicity; most clearly for black and Hispanic resident. To provide for equal economic opportunity, Lake County needs to remove barriers to residents' economic prospects, health, and overall quality of life. Disrupting these inequitable patterns is essential to achieve "inclusive growth".

Discussion

According to the 2019 Community Needs Assessment focused on the Latinx community performed by service provider Mano a Mano, the biggest work challenge is wanting more or better work but lacking education (47%) or English-speaking ability (41%). Only 17% of respondents reported being happy with their work situation. The Assessment contemplates helping clients start childcare services as a potential social enterprise.

In addition, CMAP's On To 2050 regional plan points out that in support of inclusive growth, it is necessary to "diversify the entrepreneurial voices engaged in the problem and solution development," for which there are ample opportunities in the North Chicago/Waukegan/Zion and Round Lake areas of Lake County.



Employment Centers

OMB Control No: 2506-0117 (exp. 06/30/2018)

MA-50 Needs and Market Analysis Discussion

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

CPD Maps *Housing Cost Burden HAMFI* map shows there is one census tract in North Chicago where greater than 58.44% of residents are cost burdened, spending more than 30% of their household income on housing costs. There are several census tracts where 47.69-58.44% of residents are cost burdened, which are generally clustered around the areas of Waukegan, North Chicago, Park City, Round Lake, and Zion. While CPD Map layers allow the user to filter Lake County census tracts by the percentage of extremely low-income, low-income, or moderate-income households that have any of four severe housing problems or one of either substandard housing, overcrowding, or severe cost burden, none of the CPD Maps layers allow the user to filter by concentrations of multiple housing problems. Though it is not possible to determine if there are areas where households with multiple housing problems are concentrated, it appears that there are census tracts all over the county with high percentages of severe housing problems among extremely low-income, low-income, and moderate-income households.

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

According to CPD Maps, there are several areas of Lake County where racial or ethnic minorities are concentrated, especially for Black or African American residents or persons of Hispanic Origin. The *Black or African American Alone* CPD Map shows that there are two census tracts with greater than 53.08% Black or African American residents and seven census tracts with 27.82-53.08% Black or African American residents. These nine communities with high concentrations of Black or African American residents are all located in the northeast area of the county, in census tracts in and around North Chicago, Park City, Waukegan, Zion, and Beach Park. Similarly, there are four census tracts with greater than 71.50% Hispanic residents and 18 census tracts with 47.80%-71.50% Hispanic residents. The majority of these communities are located in the northeast area of county as well, in census tracts in and around Waukegan, Park City, and North Chicago. According to CPD Maps, there are no areas with high concentrations of residents who identify as American Indian/Alaskan Native alone, Asian alone, or Native Hawaiian/Pacific Islander alone. As shown in the graphic below, unfortunately some minorities in Lake County have greater housing cost burden.

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

The census tracts with high concentrations of Black or African American or Hispanic residents are mostly in and around cities such as Waukegan, Zion, North Chicago, Park City, Round Lake, Round Lake Beach. These areas are also present on several other CPD Maps layers that explore market characteristics.

- According to the *Median Home Valu*e CPD Map, all of these census tracts have the lowest Median Home Values in Lake County, at $0-$181,300.01.

- The *Owner Units to 100 Percent HAMFI* CPD Map shows the percentage of homeowner units in a community that are affordable to a household with 100% of the Area Median Income. Low- and moderate-income households will be most likely to afford homes in these communities. The census tracts with greater than 58.29% of owner units affordable to moderate income households also tend to correspond to these areas.

Lastly, the *Percent Renter Occupied Housing* CPD Map shows that these areas also have higher percentages of renter-occupied housing. While the majority of Lake County census tracts have less than 55.86% housing occupied by renters, a small number of census tracts have 55.86-75.72% or greater than 75.72% renter-occupied housing. Many of these census tracts correspond to the tracts with high concentrations of Black or African American or Hispanic Residents.

Are there any community assets in these areas/neighborhoods?

Lake Michigan is a significant asset in both Waukegan and North Chicago, along with the Union Pacific North line of the Metra Commuter Rail. Both the College of Lake County and Lake County government have significant facilities in Waukegan, while both the Abbvie Corporation and the U.S. Navy have facilities in North Chicago.

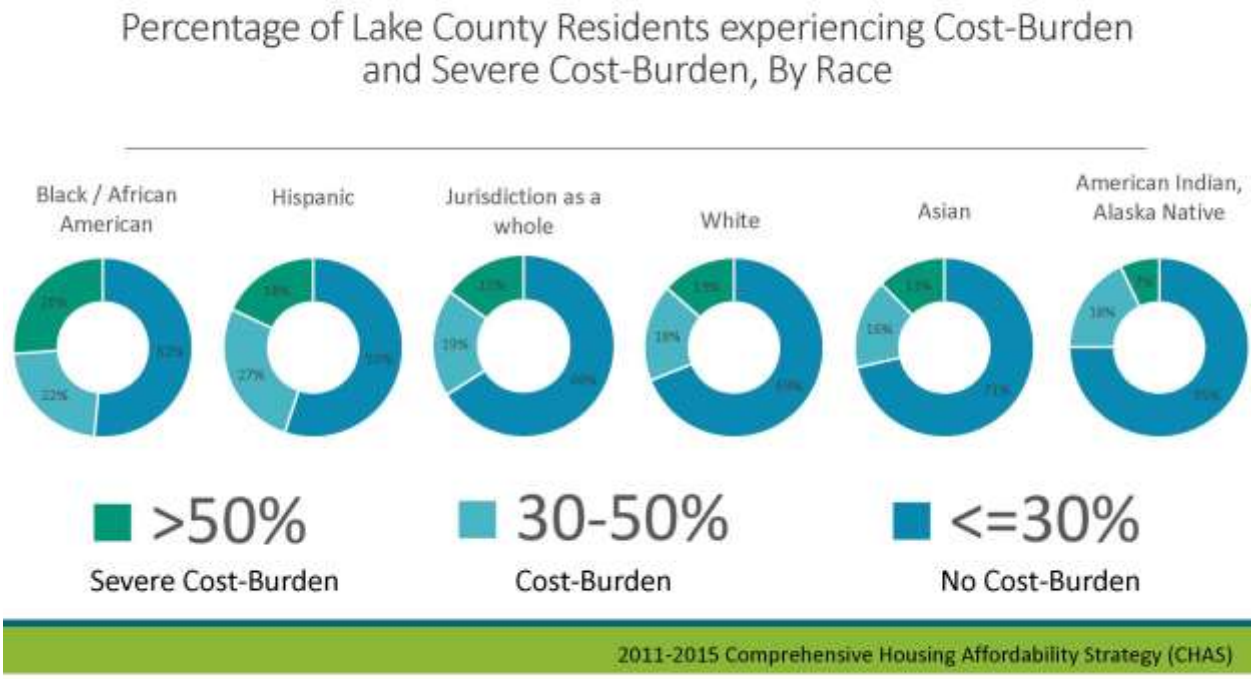
Despite such resources, CMAP's regional plan observes, “All seven counties have some communities that, while rich in assets, have seen long-term disinvestment. These areas require focused and catalytic investment as well as assistance that will build their ability to improve their resident’s quality of life.”

Strategically, in its regional analysis CMAP makes a distinction between:

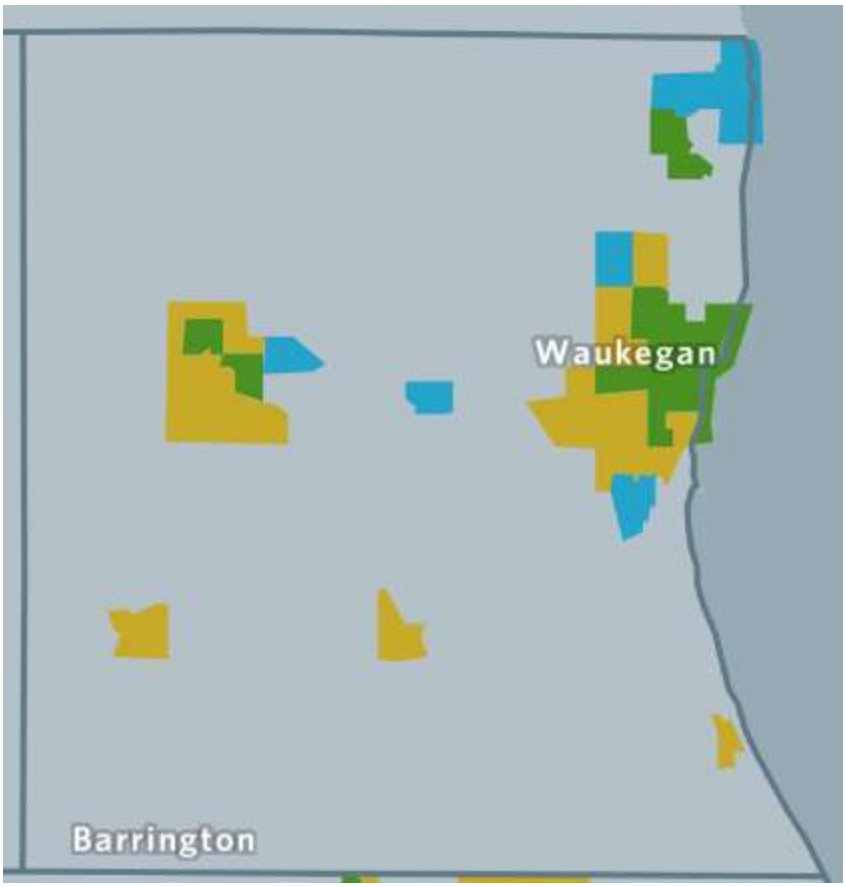
1. Economically disconnected areas- greater Round Lake area, Park City
2. Disinvested areas – Zion, North Chicago, part of Round Lake area
3. Both – Waukegan, parts of North Chicago, Round Lake area and Zion

Are there other strategic opportunities in any of these areas?

A total of five census tracts in Lake County have been designated as federal opportunity zones according to IRS regulations in the 26 USC Subtitle A, CHAPTER 1, Subchapter Z: Opportunity Zones. The census tracts cover portions of Waukegan, North Chicago, Zion and Park City. The recent opportunity zone legislation provides incentive to private investors to invest in capital starved areas. Opportunity zones make for attractive targets for investment for the holders of unrealized capital gains. Investments in these areas stand to significantly help the community, since estimates of the unrealized gains held by investors is in the trillions of dollars.



Some Minorities in Lake County have Greater Housing Cost Burden



Lake County Economically Disinvested Areas (EDA) Souce: CMAP

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

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

Low-income households in Lake County have lower levels of access to the internet and fewer devices to access the internet, as shown in the Market Analysis of Broadband, Device and Internet Access for Lake County, City of North Chicago and City of Waukegan (2017) below.

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

Increased competition is needed for broadband services in Lake County in order to reduce the cost of internet services and make it available to anyone regardless of income. The broadband market in Lake County is an oligopoly, with few providers of an undifferentiated products - internet service - so suppliers are able to keep prices high due to lack of price competition.

Device, Broadband and Internet Access for Lake County, City of North Chicago and City of Waukegan 2017 Five-Year Estimates			
Geography	Lake County	North Chicago	Waukegan
Has one or more types of computing devices:	92.3%	86.6%	87.6%
Has one or more types of computing devices: Desktop or laptop	85.8%	73.6%	70.4%
Has one or more types of computing devices: Smartphone	87.5%	74.4%	75.1%
Percent; No computer	7.7%	13.4%	12.4%
With an Internet subscription:	87.3%	75.2%	79.1%
With an Internet subscription: Broadband of any type	86.9%	75.2%	78.8%
With an Internet subscription: Broadband of any type - Cellular data plan	83.3%	57.9%	58.8%
With an Internet subscription: Broadband of any type - Broadband such as cable, fiber optic or DSL	77.9%	59.8%	61.2%
Broadband satellite	4.5%	5.6%	4.2%
Without internet subscription	9.2%	24.8%	20.9%
Less than $20,000: With a broadband Internet subscription	60.4%	56.3%	55.8%
Less than $20,000: Without an Internet subscription	39.1%	43.7%	43.9%
$20,000 to $74,999: With a broadband Internet subscription	80.7%	75.5%	79.4%
$20,000 to $74,999: Without an Internet subscription	18.8%	24.5%	20.3%
$75,000 or more: With a broadband Internet subscription	95.7%	92.2%	92.0%
$75,000 or more: Without an Internet subscription	4.0%	7.8%	7.7%
Source: U.S. Census American Fact Finder, 2017 Data Set S2801. Accessed: March 9, 2020. In 2017 inflation-adjusted dollars.			

Broadband Data

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

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

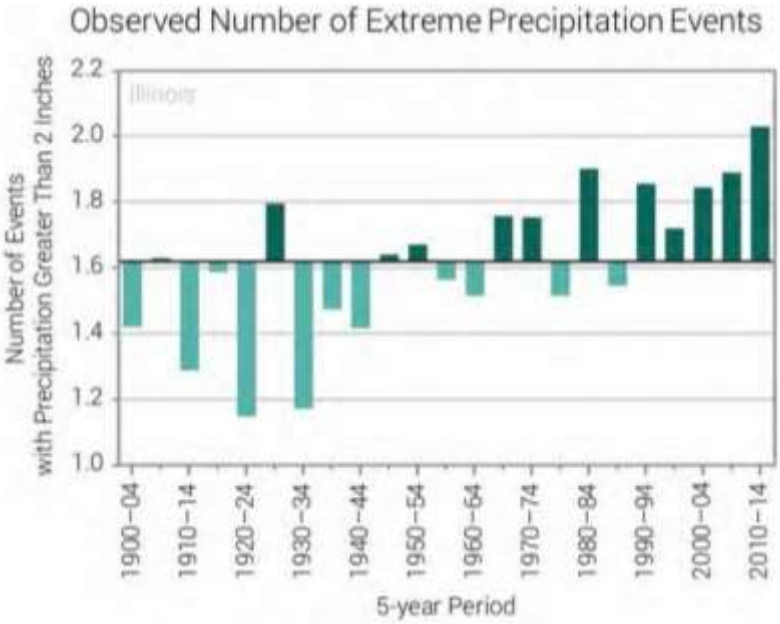
Flooding is the most prevalent natural hazard facing the residents of Lake County. The physical geography, urban development and the relatively flat regional topography all contribute to Lake County's flooding issues. Flooding causes problems for road and rail transportation, utility outages and sewer overflows. All of which lead to personal and financial stresses for Lake County residents.

Much of the existing infrastructure was designed using standards that pre-date the increased number of heavy rain events, freeze-thaw cycles, and hotter and wetter conditions posed by a changing climate. The Lake County Watershed Development Ordinance (WDO) requires the use of the Rainfall Depth-Duration Frequency Tables for Lake County for regulatory design criteria. These rainfall amounts are used to calculate and size stormwater infrastructure such as storm sewers and detention basins. The design rainfall data are referenced from the 1989 Illinois State Water Survey Bulletin 70 publication, which is based on observed precipitation data between roughly 1901 and 1983. In March 2019, the Illinois State Water Survey released updated rainfall data for Bulletin 70, based on precipitation data from 1948 to 2017. An initial evaluation indicates that the revised rainfall amounts for Lake County are between 20% and 45% higher than those currently used. Increased frequency and intensity of rainfall events will stress existing infrastructure and represents a natural hazard risk for all Lake County residents.

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

Climate change is leading to more intense flooding events and Lake County and the negative impacts of can disproportionally affect Low/Moderate Income Areas (LMAs). Municipalities with high concentrations of LMI residents often lack the capital resources needed to maintain existing infrastructure. There are even fewer resources available to make the necessary preventative infrastructure improvements to prepare for a changing climate. CMAP acknowledge this need in *On to 2050 Comprehensive Plan*, which identified economically disconnected populations as lacking access to critical resources, making it difficult for residents to respond to flooding as it occurs as well as the aftermath of damages it can bring to homes and businesses. CMAP advises that in order to help the most vulnerable residents communities improve existing natural resources and incorporate sustainable building and greening practices. Flood damage can make communities less desirable due to the increased rate of deterioration of building facades, streets, sidewalks and other infrastructure. It is critical that efforts be made to prepare these areas for the changing climate.

OMB Control No: 2506-0117 (exp. 06/30/2018)



The observed annual number of days with precipitation greater than 2 inches for 1900–2014 on average over 5-year periods (Source: Frankson et al., 2017)

Strategic Plan

SP-05 Overview

Strategic Plan Overview

The focus of this HUD Strategic Plan was synthesized through public hearings, community consultations and agency surveys. They leverage excellent work done previously by transit-focused and regional planners, namely the Chicago Metropolitan Agency for Planning (CMAP) which observed, "Metropolitan Chicago simply cannot thrive when so many people and places are left behind. Despite our many enviable assets, we fall short of ensuring economic opportunity for all residents. Though also true of many other regions, this unfortunate reality is particularly evident here according to numerous measures based on race or ethnicity." CMAP sums up the regional need to " **take proactive steps to open doors in communities where opportunity hasn't knocked for generations."**

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

Geographic Area

Table 50 - Geographic Priority Areas

1	**Area Name:**	Fox Lake Area
	Area Type:	Local Target area
	% of Low/ Mod:	65% LMI
	Revital Type:	Comprehensive
	Identify the neighborhood boundaries for this target area.	The two low/moderate income census tracts in the Fox Lake area are located in the downtown area and the lake area just north of downtown.
	Include specific housing and commercial characteristics of this target area.	Approximately 65% of households in these two census tracts meet the low/moderate income threshold. Due to its founding as a lakeside resort community, many of the existing homes were initially constructed as summer homes and have since been converted to permanent residences. Such residences suffer from lack of appropriate infrastructure and quality building materials that withstand the tests of time - making for naturally occurring affordable housing.
	How did your consultation and citizen participation process help you to identify this neighborhood as a target area?	Data, consultation & citizen participation.
	Identify the needs in this target area.	Fox Lake has identified needs to enhance of the downtown area with commercial uses and improved recreation amenities at the lake. A local planning study noted that appearance of commercial buildings require updating.
	What are the opportunities for improvement in this target area?	Fox Lake is the terminus of the Milwaukee District North line of Metra commuter rail, so connection to jobs elsewhere in Lake County and downtown present opportunities for income growth. Beautifying the lakeside areas would also attract more investment to the community.

OMB Control No: 2506-0117 (exp. 06/30/2018)

	Are there barriers to improvement in this target area?	Barriers in the Fox Lake area include lack of capital and vacant commercial properties with perceived value greater than actual market value, so remain abandoned.
2	**Area Name:**	High Outcome Areas
	Area Type:	Local Target area
	% of Low/ Mod:	n/a
	Revital Type:	Comprehensive
	Identify the neighborhood boundaries for this target area.	The High Outcome Areas in Lake County are illustrated in the High Outcomes Map located below (in this section).
	Include specific housing and commercial characteristics of this target area.	A variety of neighborhoods qualify as High Outcome Areas; therefore, there are no specific housing and commercial characteristics that are common across all High Outcome Areas. High Outcome Areas consist of census tracts where the expected household income for persons growing up there is greater than 80% AMI, with low incarceration rates, per the Opportunity Atlas (https://www.opportunityatlas.org/) based on U.S. Census data.

OMB Control No: 2506-0117 (exp. 06/30/2018)

	How did your consultation and citizen participation process help you to identify this neighborhood as a target area?	Initially, Lake County's 2014 Analysis of Impediments to Fair Housing Choice (AI) noted that most local affordable housing is located in areas of high poverty and in areas with concentrations of racial and ethnic minorities. The AI prioritized the need for Lake County to invest affordable housing investment dollars in "opportunity" areas of the County in proximity to strong schools and employment. When updating the AI in 2020, Lake County relied on the new Opportunity Atlas data tool (www.opportunityatlas.org) which illustrates past outcomes related to income and incarceration based on where a person grew up. While most of Lake County is a high outcome area, the Fox Lake / Highwood / Mundelein / North Chicago / Round Lake / North Chicago / Waukegan / Zion target areas lacked the outcomes of strong income and low incarceration rates. This analysis reconfirmed Lake County's commitment to locate affordable housing, when possible, outside of these areas in Lake County's high outcome areas. Both the 2014 AI and the 2020 AI Update were broadly supported during the citizen participation process, which in 2019-2020 included four public hearings.
	Identify the needs in this target area.	High outcome areas in Lake County tend to lack affordable housing and some lack racial/ethnic diversity.
	What are the opportunities for improvement in this target area?	High outcomes areas in Lake County can benefit from offering more housing choice, such as affordable rental units, especially larger rental units.
	Are there barriers to improvement in this target area?	Local land use policy and lack of available sites impede affordable housing development in high outcome areas. Please see section SP-55 Strategic Plan Barriers to Affordable Housing.
3	**Area Name:**	Highwood Area
	Area Type:	Local Target area
	% of Low/ Mod:	71%
	Revital Type:	Comprehensive

OMB Control No: 2506-0117 (exp. 06/30/2018)

	Other Revital Description:	
	Identify the neighborhood boundaries for this target area.	Highwood contains two census tracts block groups that have 1,730 residents living at or below 80% of area median income (09786540001 and 09786520002). The entire community, however, has 48.6% of its population living at or below 80% of area median income.
	Include specific housing and commercial characteristics of this target area.	Highwood's housing stock accommodates a wide variety of residents ranging from first-time homebuyers to CEOs.
	How did your consultation and citizen participation process help you to identify this neighborhood as a target area?	CDBG Low/Moderate Income Census maps
	Identify the needs in this target area.	With only a few lots available for development, improving existing housing is vital to Highwood's future. Park land is also too limited in supply.
	What are the opportunities for improvement in this target area?	Highwood has a unique character and great restaurants that draw clientele from throughout Lake County and northern Cook County. Capitalizing on its downtown is an ongoing opportunity, of which Highwood takes full advantage by planning many festivals to attract community members to its restaurants and small businesses. Highwood's 2013 Comprehensive Plan provides a blueprint to encourage more dense multi-family and mixed-use development in its downtown and immediately adjacent areas.
	Are there barriers to improvement in this target area?	Lack of available land.
4	**Area Name:**	North Chicago Area
	Area Type:	Local Target area
	% of Low/ Mod:	72%

OMB Control No: 2506-0117 (exp. 06/30/2018)

	Revital Type:	Comprehensive
	Identify the neighborhood boundaries for this target area.	Census tracts; 17097862300, 17097862502, 17097862901, 17097862902, 17097863003, 17097863004, 17097863100 and 17097863201.
	Include specific housing and commercial characteristics of this target area.	Housing - There is a large percentage of older renter-occupied homes on narrow lots in the north and east side of the City as compared to other areas of the City/County. Compared to other areas of the County, North Chicago has a diverse and low-cost housing stock. However, housing affordability remains an issue for residents. This area has slightly higher rates of vacant and distressed properties. Commercial - North Chicago is home to major institutions (Abbvie, Abbott, Rosalind Franklin, Lovell, Great Lakes Naval Academy). These institutions attract numerous commuters on a daily basis and commercial opportunities exist to capitalize on these high traffic corridors. The City has strong manufacturing base particularly due to Abbvie and Abbott.
	How did your consultation and citizen participation process help you to identify this neighborhood as a target area?	Data, consultation & citizen participation
	Identify the needs in this target area.	Improved housing condition, job creation, grocery store and infrastructure.

OMB Control No: 2506-0117 (exp. 06/30/2018)

	What are the opportunities for improvement in this target area?	The City is home to several major employers that attract a large number of commuters on a daily basis. There is an opportunity to capitalize on the commercial potential of the high traffic corridors in the City. The City also owns a large desirable property near the main entrance to the Great Lakes Naval Academy which has high redevelopment potential. The North Chicago Metra Station has the potential to serve as a major transit hub due to the proximity to downtown, Abbvie and Abbott Labs, and Great Lakes Training Center, and its service by Metra, Pace bus, and various shuttle services. The City has a tremendous assess with public access to Lake Michigan. However, accessing the Lakefront is difficult via Foss Park Avenue and the space is constrained by the locations of several major institutions.
	Are there barriers to improvement in this target area?	North Chicago struggles with unemployment rates and educational attainment as compared to other areas of the County. North Chicago Community Unit School District (CUSD) 187 serves almost all of the City of North Chicago, including residents of Great Lakes Naval Academy. Due to poor academic performance and funding mismanagement CUSD 187 is operating under state oversight. A high performing school system is a vital part of sustaining a strong community. Five major institutions (Great Lakes Naval Academy, Abbott, Abbvie, Rosalind Franklin and Lovell Federal Health Care) have significant influence on the character and direction of the City. Approximately 34% of the land within the City limits is controlled by federal institutions.
5	**Area Name:**	Mundelein Area
	Area Type:	Local Target area
	% of Low/ Mod:	60%
	Revital Type:	Comprehensive

OMB Control No: 2506-0117 (exp. 06/30/2018)

	Identify the neighborhood boundaries for this target area.	Mundelein is centrally located in Lake County and is featured by income and ethnic diversity. The remaining areas of low/moderate income concentration are census tracts; 17097864002, 17097864001, 17097864510 and 17097864511.
	Include specific housing and commercial characteristics of this target area.	Approximately 60% of households in these census tracts are below area median income.
	How did your consultation and citizen participation process help you to identify this neighborhood as a target area?	Data, consultation & citizen participation.
	Identify the needs in this target area.	Preserve existing affordable housing & continue revitalizing commercial areas.
	What are the opportunities for improvement in this target area?	Residents need better access to living wage jobs. Some housing is in dire need of rehabilitation and preservation. The Village of Mundelein has expressed interested in collaborating on affordable housing development for seniors.
	Are there barriers to improvement in this target area?	The Village of Mundelein has recently completed a multi-family affordable rental housing building to be developed in their downtown district. It may be difficult to site an additional affordable multifamily project in downtown area.
6	**Area Name:**	Round Lakes Area
	Area Type:	Local Target area
	% of Low/ Mod:	64%
	Revital Type:	Comprehensive
	Identify the neighborhood boundaries for this target area.	This area contains unincorporated areas plus Hainesville, Round Lake itself, Round Lake Beach, Round Lake Heights, and Round Lake Park. Please see the CDBG Low/Moderate Income area map below for more detail.

OMB Control No: 2506-0117 (exp. 06/30/2018)

	Include specific housing and commercial characteristics of this target area.	Approximately 64% of households are below area median income.
	How did your consultation and citizen participation process help you to identify this neighborhood as a target area?	Data, consultation & citizen participation.
	Identify the needs in this target area.	Preserve existing affordable housing & commercial revitalization. The high poverty level exists despite local amenities, indicating need for greater job readiness and connectivity to jobs.
	What are the opportunities for improvement in this target area?	The Round Lake communities need focused investment to reduce residents' poverty level. Opportunities exist to leverage the area's several Metra stations and Round Lake Civic Center. Rollins Crossing is a major commercial area experiencing many vacancies which could offer the opportunity to locate a combination of housing, commercial and recreational uses.
	Are there barriers to improvement in this target area?	The close proximity of several units of government in this area necessitates extensive intergovernmental communication and collaboration.
7	**Area Name:**	Waukegan Area
	Area Type:	Local Target area
	% of Low/ Mod:	70%
	Revital Type:	Comprehensive

OMB Control No: 2506-0117 (exp. 06/30/2018)

	Identify the neighborhood boundaries for this target area.	Census tracts; 17097861504, 17097861506, 17097861509, 17097861702, 17097861803, 17097861804, 17097861901, 17097861902, 17097862000, 17097862100, 17097862200, 17097862300, 17097862401, 17097862402, 17097862501, 17097862502, 17097862603, 17097862604, 17097862605, 17097862700, 17097862800 and 17097866100.
	Include specific housing and commercial characteristics of this target area.	Housing - This area has a near equal share of homeownership and rental housing. The vacancy rates of this area are slightly higher and housing values are lower than the remainder of the County. Commercial – The City of Waukegan has suffered punctuated employment loss. Historically, large scale manufacturing companies provided the majority of jobs for Waukegan residents. With improvements in technology these largely blue-collar jobs are no longer available.
	How did your consultation and citizen participation process help you to identify this neighborhood as a target area?	Data, consultation & citizen participation.
	Identify the needs in this target area.	Housing affordability is an issue, especially in areas with older homes which drive up rehabilitation costs. The City needs housing accommodations that attract future residents, specifically young families. Median household income is less the City as compared to other areas of the County. The City is continuing efforts to address this issue and enhance the educational attainment of residents.

OMB Control No: 2506-0117 (exp. 06/30/2018)

	What are the opportunities for improvement in this target area?	There is an opportunity for infill development in the downtown area. The proximity to large scale companies, such as United Conveyor, VisualPak, Peer Bearing, AbbVie Pharmaceuticals, and Abbott Laboratories present an opportunity for commercial success. The City was awarded casino license by the State of Illinois and there it is anticipated that a casino could be developed at Fountain Square. The development of a casino would provide a large-scale opportunity for economic development.
	Are there barriers to improvement in this target area?	Waukegan has historically been a manufacturing and shipping center. As manufacturing has slowed, many manufacturers have left. Abandoned sites present a number of environmental concerns. Access to the lakefront is difficult. There is a steep topographic grade between the downtown area and the lakefront. The Amstutz Expressway and rail lines present a physical barrier between the lakefront and downtown.
8	**Area Name:**	Zion Area
	Area Type:	Local Target area
	% of Low/ Mod:	73%
	Revital Type:	Comprehensive
	Identify the neighborhood boundaries for this target area.	Census tracts; 17097860200, 17097860301, 17097860302, 17097860400, 17097860500 and 17097860600.

OMB Control No: 2506-0117 (exp. 06/30/2018)

	Include specific housing and commercial characteristics of this target area.	Housing - Housing in this area has a homeownership percentage less than the other areas of the County. The homes primarily consist of single family homes. There is a larger percentage of federally subsidized homes in Zion as compared to other areas of the County. The median home values in this area are less than other areas of the County, which may be explained by a high number of small lots and homes for starter families. Commercial - The lack of economic opportunity within the City of Zion has led to the vast majority of residents working outside city limits. The City is highly dependent on the Cancer Treatment Center of America (CTCA) which is both the City's largest employer but also drives the demand for lodging and weekday commercial activity.
	How did your consultation and citizen participation process help you to identify this neighborhood as a target area?	Data, consultation and citizen participation.
	Identify the needs in this target area.	The City lacks direct access to an urgent care facility. While there are national grocery chain stores present within the city limits, census tract 17097860301 is considered by the USDA as a food desert. There is a need for a healthy food option for the residents in the central area of the City. Overall housing needs in Zion include an increase in demand for all types of quality housing, with the greatest demand for more multifamily housing options and small-lot single-family homes.

OMB Control No: 2506-0117 (exp. 06/30/2018)

	What are the opportunities for improvement in this target area?	Opportunities for improvement exist with the untapped potential of the lakefront. Expanding the lakefront park and increasing transit linkage to the Metra station and lakefront would increase a potential customer base for local businesses. Illinois Beach State Park (IBSP) draws over one million visitors to Zion, however the entryway is poorly located. Relocating the entryway to IBSP so that the downtown area would benefit from the visitors would be a significant improvement. The relocation would also benefit the Metra Station by providing better access to the lakefront for visitors coming from the south.
	Are there barriers to improvement in this target area?	Land use in the adjacent areas to the City tends to isolate the City. With the lake to the east, rural development to the north and floodplains and forest preserve to the west, the potential regional customer market for the City is limited. In addition, the major north-south transportation corridors (Route 41 and Interstate 294) are located more than 5 miles to the west. The Zion Nuclear Power Plant (ZNPP) has been decommissioned, however the property limits access to Lake Michigan and Illinois Beach State Park. The presence of the ZBPP will remain a long-term barrier for the City and the any potential improvements to Illinois Beach State Park.

General Allocation Priorities

Describe the basis for allocating investments geographically within the state

Geographic prioritization of federal investment will continue to adopt the two-pronged approach established for Community Development Block Grant (CDBG) and HOME Investment Partnership funds in the previous Consolidated Plan (2015-19):

1. **Assist in expanding the supply of housing in High Outcome Areas.** In an effort to support inclusive growth, Lake County recognizes the U.S. Census Opportunity Atlas definition of a "High Outcome Area" as an area where expected household income for people who grew up there is higher than 80% AMI. Prioritizing investment in these areas, especially in the creation of new affordable housing units, will

OMB Control No: 2506-0117 (exp. 06/30/2018)

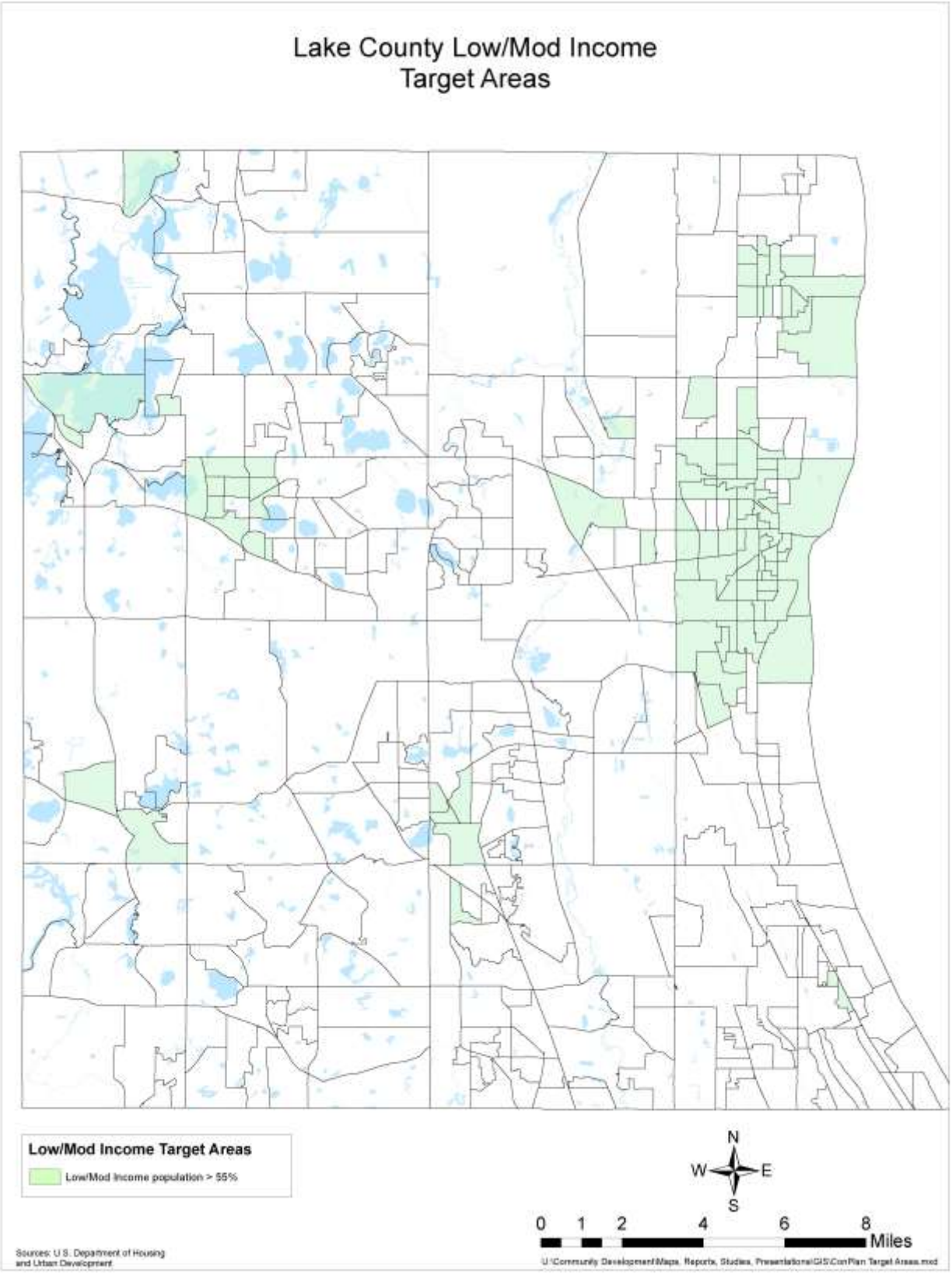
promote economic mobility for all Lake County residents.

2. **Revitalize areas of greatest need.** In addition to the entitlement communities of North Chicago and Waukegan, several areas of Lake County are home to a concentrated number of low/moderate income households whose neighborhoods would benefit from community reinvestment. Indicated in HUD data as census tracts where over 55% of households are at or below area median income (AMI) these target areas are identified in green in the map below. In further articulating each area's specific needs/barriers, place-based strategies and opportunities, Lake County will continue work with the respective local governments for these areas.

All of Lake County's areas of greatest need, other than Fox Lake, are also identified as Economically Disconnected Areas (EDAs) "characterized by low-income minority and limited English proficiency communities as well as weak demand for nonresidential land uses" (www.cmap.illinois.gov/2050/maps/eda). For these communities, CMAP recommends:

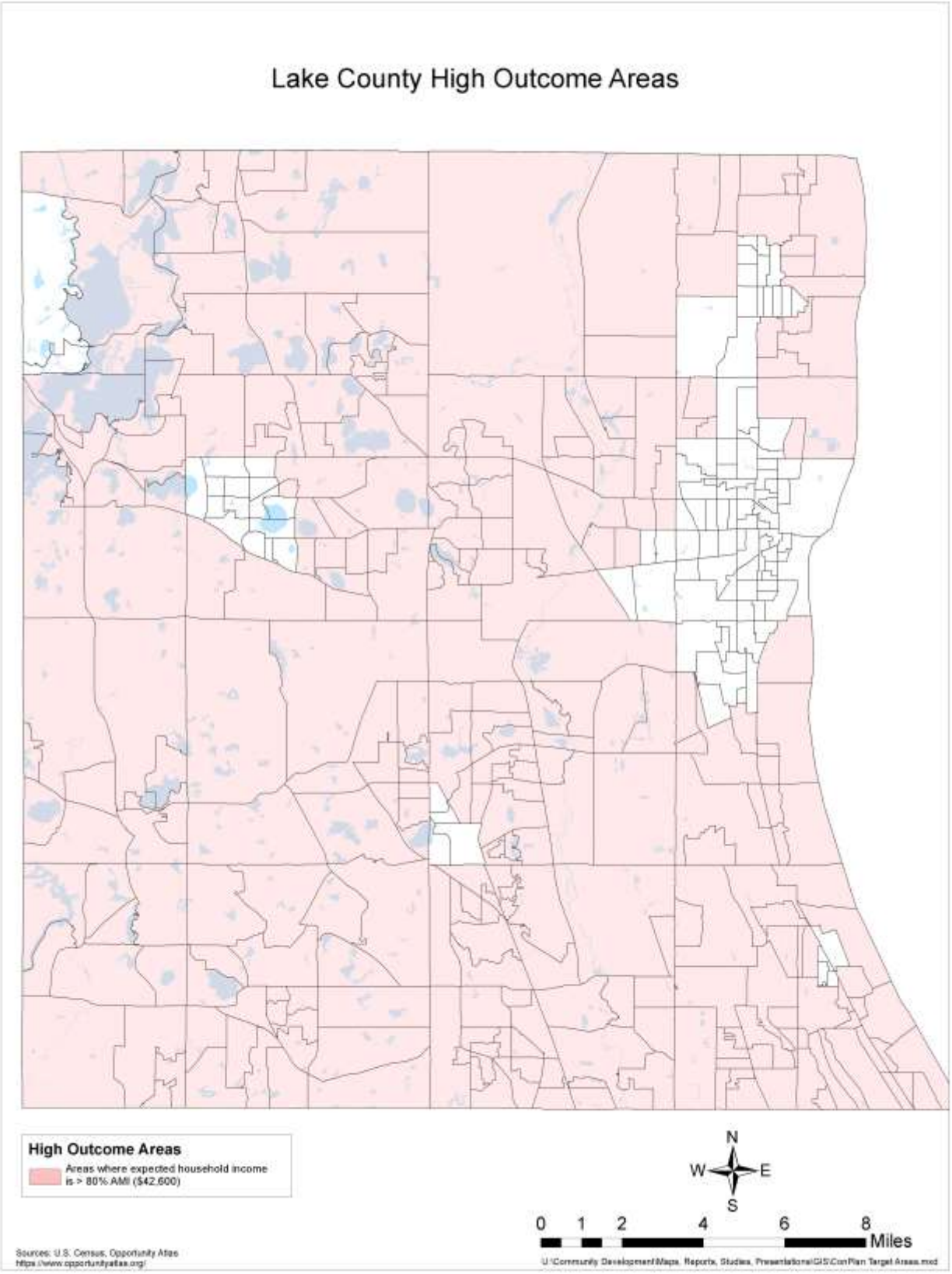
- Rebuilding communities, increasing local revenues and enhancing local government capacity and expertise
- Broadening opportunities for innovation and promoting pathways for upward economic mobility
- Growing the ability of vulnerable populations to respond to environmental challenges and improving environmental conditions and access to nature for those populations
- Promoting tax policy reforms and technical assistance to communities
- Improving mobility options that spur economic opportunity for low-income communities, people of color, and people with disabilities

Source: CMAP ON TO 2050 Plan (www.cmap.illinois.gov/2050/maps/eda)



Low/Mod Income Areas > 55%

OMB Control No: 2506-0117 (exp. 06/30/2018)



High Outcome Areas

OMB Control No: 2506-0117 (exp. 06/30/2018)

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

Priority Needs

Table 51 – Priority Needs Summary

1	**Priority Need Name**	End Homelessness in Lake County
	Priority Level	High
	Population	Extremely Low Low Large Families Families with Children Elderly Rural Chronic Homelessness Individuals Families with Children Mentally Ill Chronic Substance Abuse veterans Persons with HIV/AIDS Victims of Domestic Violence Unaccompanied Youth
	Geographic Areas Affected	Mundelein Area Round Lakes Area Waukegan Area Zion Area Fox Lake Area North Chicago Area High Outcome Areas Highwood Area
	Associated Goals	Improve homeless crisis response system

OMB Control No: 2506-0117 (exp. 06/30/2018)

	Description	Absolute focus is needed to finish Lake County's work on ending homelessness. During the past five years, Lake County and its HUD Continuum of Care, the Lake County Coalition for the Homeless, joined the Built for Zero national collaboration to end homelessness. Built for Zero provided extensive technical assistance and peer consultation that assisted in the establishment of Lake County's coordinated entry process and high-quality "by-name" list. Using data and actual client contact in a coordinated "entry" into the homeless services system, Lake County's homeless service providers are able to prioritize scarce housing resources for homeless people and families with the most critical needs. In 2020, Lake County was among the first ten communities in the United States to end veteran homelessness, after which it set its sights on ending chronic homelessness ---a life-threatening condition --- as soon as possible. To now end chronic homelessness and then to end youth & family homelessness, this Plan emphasizes the goal to Improve the Homeless Crisis Response System in Lake County and more quickly move people who are homeless into housing.
	Basis for Relative Priority	Lake County's four priority needs are considered on par and symbiotic with each other. The extent to which Plan activities focus on addressing one need over another stems from the timing of community progress and projects available to fund which address each need.
2	**Priority Need Name**	Inclusive Growth
	Priority Level	High

OMB Control No: 2506-0117 (exp. 06/30/2018)

	Population	Extremely Low Low Large Families Families with Children Elderly Public Housing Residents Rural Chronic Homelessness Individuals Families with Children Mentally Ill Chronic Substance Abuse veterans Persons with HIV/AIDS Victims of Domestic Violence Unaccompanied Youth Elderly Frail Elderly Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities Persons with Alcohol or Other Addictions Persons with HIV/AIDS and their Families Victims of Domestic Violence Non-housing Community Development
	Geographic Areas Affected	Mundelein Area Round Lakes Area Waukegan Area Zion Area Fox Lake Area North Chicago Area
	Associated Goals	Maximize Affordable Housing Assist People with Special Needs Improve homeless crisis response system Create Pathways for Upward Economic Mobility

OMB Control No: 2506-0117 (exp. 06/30/2018)

	Description	"Long-term regional prosperity requires economic opportunity for all residents and communities" according to ON TO 2050, the long-range strategic plan authored by the Chicago Metropolitan Agency for Planning (CMAP). It goes on to explain that "To compete in the global economy, we (the Chicago metropolitan region) must tap the full potential of all our workers, businesses, and infrastructure. Currently, a substantial portion of the region's human capital --- embodied in the talents and skills of excluded residents --- is being wasted. Paired with other strategies to capitalize on the region's economic assets, emphasizing inclusive economic initiatives can help restart long-term growth in disinvested places and increase prosperity across the region." CMAP's recommendations to address inequality includes an area ripe for Community Development Block Grant (CDBG) investment, "Invest in Disinvested Areas". The strategies identified by CMAP include: (1) Identify new solutions and target existing resources in disinvested areas; (2) Target assistance in rapidly changing areas to preserve affordability, quality of life and community character"; (3) Create opportunity for low capacity communities for infrastructure investments; and (4) Build municipal, nonprofit and private sector capacity to access funding and financial resources. (www.cmap.illinois.gov/2050/community/disinvested-areas) During this five-year period, CDBG Public Service dollars will be targeted in transportation, adaptive equipment for people with disabilities and diversity/inclusion programming addressing the need for inclusive growth.
	Basis for Relative Priority	Lake County's four priority needs are considered on par and symbiotic with each other. The extent to which Plan activities focus on addressing one need over another stems from the timing of community progress and projects available to fund which address each need.
3	**Priority Need Name**	Accessible Housing
	Priority Level	High

OMB Control No: 2506-0117 (exp. 06/30/2018)

	Population	Extremely Low Low Moderate Middle Large Families Families with Children Elderly Public Housing Residents Rural Chronic Homelessness Individuals Families with Children Mentally Ill Chronic Substance Abuse veterans Persons with HIV/AIDS Victims of Domestic Violence Unaccompanied Youth Elderly Frail Elderly Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities Persons with Alcohol or Other Addictions Persons with HIV/AIDS and their Families Victims of Domestic Violence Non-housing Community Development
	Geographic Areas Affected	Mundelein Area Round Lakes Area Waukegan Area Zion Area Fox Lake Area North Chicago Area High Outcome Areas Highwood Area
	Associated Goals	Maximize Affordable Housing Assist People with Special Needs

OMB Control No: 2506-0117 (exp. 06/30/2018)

	Description	Lake County residents need more access to quality affordable housing. The need to produce more units of affordable units across the County in the Consolidated Plan cycle is evident. Lake County must continue to focus investment into increasing the supply of affordable housing units, especially in high outcome areas. In addition, Lake County must continue to look to invest into improving the condition of the existing housing stock, focusing on areas with concentrations of low and moderate income households.
	Basis for Relative Priority	All four priority needs are equal priority.
4	**Priority Need Name**	Borderless Transit
	Priority Level	High

OMB Control No: 2506-0117 (exp. 06/30/2018)

	Population	Extremely Low Low Moderate Middle Large Families Families with Children Elderly Public Housing Residents Rural Chronic Homelessness Individuals Families with Children Mentally Ill Chronic Substance Abuse veterans Persons with HIV/AIDS Victims of Domestic Violence Unaccompanied Youth Elderly Frail Elderly Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities Persons with Alcohol or Other Addictions Persons with HIV/AIDS and their Families Victims of Domestic Violence Non-housing Community Development
	Geographic Areas Affected	Round Lakes Area Waukegan Area Zion Area Fox Lake Area North Chicago Area
	Associated Goals	Maximize Affordable Housing Assist People with Special Needs Improve homeless crisis response system Create Pathways for Upward Economic Mobility

OMB Control No: 2506-0117 (exp. 06/30/2018)

	Description	In Lake County, basic needs include having a car, which adds to a family's fixed expenses. Without a car, most Lake County residents can reach neither services, like healthcare, nor their jobs. Improving mobility options would spur economic opportunity for low-income communities, people of color, and people with disabilities and reduce the number of poverty-level families by increasing transportation access to good jobs. The need for public transit across Lake County, regardless of municipal or township boundaries, overlaps with all four HUD Strategic Plan goals, so in 2020-24, CDBG Public Service dollars will be targeted for piloting new transit solutions recommended by the Lake County Division of Transportation in association with community partners.
	Basis for Relative Priority	Lake County's four priority needs are considered on par and symbiotic with each other. The extent to which Plan activities focus on addressing one need over another stems from the timing of community progress and projects available to fund which address each need.

Narrative (Optional)

Lake County, along with its partners, has identified four high priority needs for the community over the next five years. The community-wide priorities most pressing to address in this Five-Year Plan are the need to End Homelessness in Lake County while also addressing the needs for Inclusive Growth, Housing Accessibility and Borderless Transit. Addressing these four needs will take time, so priority will be given in 2020-24 HUD funding rounds to the needs for which solutions are well-developed, funded and ready to implement. To that end, Lake County will seek, in the first year of its HUD Strategic Plan, to provide several capacity-building grants across all four priority need areas in order to get projects ready to fund in the five-year period.

In other words, 2020-24 HUD-funded programs and projects that address these four needs will be prioritized based on the extent to which they meet community goals and multiple other factors, the most important of which is project readiness.

SP-30 Influence of Market Conditions - 91.415, 91.215(b)

Influence of Market Conditions

Affordable Housing Type	Market Characteristics that will influence the use of funds available for housing type
Tenant Based Rental Assistance (TBRA)	The CSH Gap Analysis of the Homeless Crisis Response system in Lake County identified a severe lack of permanent housing already funded with homeless system resources. In a Pay For Success demonstration project, Lake County – with technical assistance from CSH – is investing HOME TBRA funds to create additional units of permanent supportive housing (PSH), the demonstrated success of which may aid the homeless service system in raising long-term private support for those new units of PSH. TBRA is an tool to expand the availability affordable housing to all populations, including non-chronic homeless populations. TBRA allows housing to be geographically diverse, with greater access to high outcome areas.
TBRA for Non-Homeless Special Needs	There is a huge need for TBRA for non-homeless, as indicated by long waitlists (that rarely open) for Housing Choice Vouchers at the local housing authorities. Lake County's supply of existing housing partners who can work within HOME requirements, however, is limited. Lake County will consider use of HOME or CDBG for TBRA for non-homeless special needs in cases where the project aligns with the HUD Strategic Plan and the subrecipient has capacity to assure compliance.
New Unit Production	**Significant unmet need.** Lake County recognizes that the creation of affordable housing requires both the preservation of existing housing stock and development of new units.
Rehabilitation	In Lake County, the waiting list for owner-occupied housing rehab is very long, and housing stock is old, indicating a high need for rehabilitation.
Acquisition, including preservation	With 228 units in five buildings of HUD affordable multi-family housing expiring during the 2020-24 timeframe, several acquisitions for preservation may present huge demand for CDBG and HOME funds.

Table 52 – Influence of Market Conditions

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

Introduction

The anticipated resources are based on the FY2020 allocation and the assumption that funding levels will remain consistent for FY2021-24.

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan $	Narrative Description
			Annual Allocation: $	Program Income: $	Prior Year Resources: $	Total: $		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	2,905,363	29,656	183,575	3,118,594	11,621,452	CDBG funds will be used to support community development in Lake County's target areas and to create affordable housing.

OMB Control No: 2506-0117 (exp. 06/30/2018)

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan $	Narrative Description
			Annual Allocation: $	Program Income: $	Prior Year Resources: $	Total: $		
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	1,670,311	113,111	88,732	1,872,154	6,681,244	HOME funds will be used to develop affordable housing for low-income communities, including new construction and rehabilitation of single- and multi-family units.
ESG	public - federal	Conversion and rehab for transitional housing Financial Assistance Overnight shelter Rapid re-housing (rental assistance) Rental Assistance Services Transitional housing	225,467	0	0	225,467	901,868	ESG funds will be used to assist persons experiencing homelessness with outreach, shelter services and rapid rehousing services.

OMB Control No: 2506-0117 (exp. 06/30/2018)

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan $	Narrative Description
			Annual Allocation: $	Program Income: $	Prior Year Resources: $	Total: $		
Other	public - local	Acquisition Admin and Planning Conversion and rehab for transitional housing Homebuyer assistance Homeowner rehab Housing Multifamily rental new construction Multifamily rental rehab New construction for ownership Rapid re-housing (rental assistance) Rental Assistance Services TBRA Transitional housing	301,000	0	0	301,000	$1,200,000	Lake County Affordable Housing Fund, as allocated by the Lake County Board. Typically $300,000 of general funds are allocated in the County's annual budget process.

Table 53 - Anticipated Resources

OMB Control No: 2506-0117 (exp. 06/30/2018)

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

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

The ESG Program regulations require 100% match. This requirement is met through local funds (Lake County Affordable Housing fund) and private funds.

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

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

Lake County owns or is tax trustee for several parcels of land throughout its jurisdiction for which there is currently no process in place to address directly the needs identified in the Consolidated Plan. Several Lake County municipalities in this Plan's Target Areas of North Chicago, Round Lake Beach and Zion have formed the new Lake County Land Bank. Potential involvement by Lake County is being explored, especially the possibility of direct sales of tax-foreclosed properties by Lake County to the Land Bank. According to CMAP, "Land banks bring important skills to address vacancy and abandonment that can be prevalent in disinvested areas and have been successful in the region with Cook County Land Bank and the South Suburban Land Bank Development Authority. Rebuilding disinvested areas will be critical to long-term regional prosperity by ensuring that jobs and economic opportunities are available in communities where economically disconnected residents live."

Discussion

The development of new affordable housing units is made possible by various funding sources beyond those available through the participating jurisdiction. In addition to applying for HOME funds from the county, affordable housing developers often utilize state funding sources such as Low Income Housing Tax Credits (LIHTC) or Illinois Affordable Housing Tax Credits (IAHTC), which are available through Illinois Housing Development Authority (IHDA). Low Income Housing Tax Credits are applied for in a competitive process; projects with high scores are awarded funding. The Low Income Housing Tax Credits Qualified Allocation Plan (QAP), which is updated annually, outlines the criteria IHDA uses to

OMB Control No: 2506-0117 (exp. 06/30/2018)

evaluate projects applying for tax credits. Criteria included in this plan are sometimes location-based and can increase or decrease the likelihood that projects in a specific area are awarded funding. For instance, the 2020-2021 QAP awards additional points to projects in Opportunity Areas (OAs). The Opportunity Areas change annually, and in recent years Lake County has had limited areas which qualify as Opportunity Areas, limiting the ability of affordable housing developers to earn high scores on IHDA applications and bring state tax credits funds to developments in Lake County.

OMB Control No: 2506-0117 (exp. 06/30/2018)

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

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

Responsible Entity	Responsible Entity Type	Role	Geographic Area Served
Lake County Coalition for the Homeless	Continuum of care	Homelessness Rental	Jurisdiction
Community Partners for Affordable Housing	CHDO	Homelessness Ownership Rental	Region
PADS Lake County	Non-profit organizations	Homelessness	Jurisdiction
Catholic Charities	Community/Faith-based organization	Homelessness Rental	Jurisdiction
ChildServ	Non-profit organizations	Economic Development Homelessness Non-homeless special needs	Region
Thresholds	Non-profit organizations	Homelessness	Region

Table 54 - Institutional Delivery Structure

Assess of Strengths and Gaps in the Institutional Delivery System

Lake County is fortunate to have numerous non-profit and agency partners with which to implement this HUD Strategic Plan. In several key work areas of this plan exist broad-ranging membership organizations that collaborate across Lake County, easing the implementation task. In ending homelessness, the County's key partner is the Lake County Coalition of the Homeless (LCCH) (www.lakecountyhomeless.org) comprised of numerous homeless service and housing agencies which have reviewed and proposed the projects in **Goal #1) Improve the Homeless Crisis Response System**. Several non-profits are working with LCCH to implement the recommendations in the CSH Gap Analysis of Lake County's homeless crisis response system, including Catholic Charities, Childserv, The Harbor, PADS and Thresholds.

For **Goal #2 (Assist People with Special Needs)** and **Goal #4 (Prioritize Pathways for Upward Economic Mobility)**, Lake County's partners include municipalities, townships and non-profits working collaboratively to enhance transportation access and job creation/business opportunities in the region primarily for people with disabilities, but also for low- and moderate-income workers.

OMB Control No: 2506-0117 (exp. 06/30/2018)

In order to **Maximize Affordable Housing (Goal #3)**, Lake County works with the handful of affordable housing developers doing work in Lake County plus numerous non-profit organizations with varying level of housing experience. The County's key housing partner is Community Partners for Affordable Housing, which was selected for this 2020-24 period to manage Lake County's down-payment assistance, owner-occupied rehabilitation and community land trust programs. Prairie State Legal Services and North Suburban Legal Aid Clinic were selected to provide legal assistance to help residents stay in housing and/or address fair housing issues.

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

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

Table 55 - Homeless Prevention Services Summary

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

The homeless crisis response system in Lake County responds to the needs of persons experiencing homelessness through engagement and connection to services and housing. The Lake County Coalition for the Homeless oversees the Coordinated Entry system to ensure that all agencies who may serve as the first point of engagement with persons experiencing homelessness can quickly connect the household to the resources they need. Emergency shelters, street outreach, mainstream system, and other providers may serve as points of entry into the system. Once identified at a point of entry, households are referred to the housing and other resources most appropriate to them. Those experiencing literal homelessness are referred to the Coordinated Entry By-Name List, where they are assessed and prioritized for housing such as permanent supportive housing, rapid rehousing, or other subsidized housing resources. Many of these resources are prioritized for subpopulations including those experiencing chronic homelessness and veteran households.

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

Lake County continually reassesses the system to identify areas of strength and address gaps utilizing System Performance Metrics (SPMs). These metrics are analyzed as a whole and specific to subpopulations including chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth. For a more thorough description of these metrics and a summary of the metrics over the last several years, please see the “NA-40 Homeless Needs Assessment” section of this document.

Additionally, Lake County recently partnered with the Lake County Coalition for the Homeless and Corporation for Supportive Housing to conduct a thorough assessment of gaps, resulting in the *Gaps Analysis of the Homeless Crisis Response System in Lake County* report. To view the full report, please visit www.lakecountyhomeless.org.

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

As part of the citizen participation process, Lake County collaborated with the Lake County Coalition for the Homeless (LCCH) and Corporation for Supportive Housing (CSH) to conduct a thorough Gaps Analysis of the Homeless Crisis Response System. The Gaps Analysis process included multiple citizen participation activities, including: interviews with key stakeholders, a Survey of Homeless Needs distributed among residents and service providers, a Housing Placement Satisfaction Survey distributed to homeless services clients, and a Coordinated Entry Survey distributed to clients who had been housed through the Coordinated Entry process. This input was incorporated into a comprehensive *Gaps Analysis*

of the Homeless Crisis Response System report, published June 2019, which identified 15 gaps and provided recommendations of how to address these needs of Lake County residents experiencing homelessness. The recommendations fit into three main categories: Initial Crisis Response (Points of Entry), Housing Interventions, and Administrative Improvements.

Once the 15 gaps and recommendations were identified, the issues were discussed at multiple meetings including meetings of the Lake County Coalition for the Homeless, Housing and Community Development Commission, and Homelessness Advisory and Recommendation Committee. Discussions at these bodies shaped Lake County's four goals and four priority needs, described in the "SP-45 Goals" and "SP-25 Priority Needs" sections of this document. As all Lake County HUD funding must align with the goals and priority needs, Lake County anticipates that many of the activities conducted over the coming year will be positioned to directly overcome the gaps identified.

To view the full *Gaps Analysis of the Homeless Crisis Response System* report, please visit www.lakecountyhomeless.org.

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

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Improve homeless crisis response system	2020	2024	Homeless	Mundelein Area Round Lakes Area Waukegan Area Zion Area Fox Lake Area North Chicago Area High Outcome Areas	End Homelessness in Lake County Inclusive Growth Borderless Transit	CDBG: $2,000,000 ESG: $1,100,000 Local: $750,000	Rental units rehabilitated: 20 Household Housing Unit Tenant-based rental assistance / Rapid Rehousing: 90 Households Assisted Homeless Person Overnight Shelter: 4550 Persons Assisted Overnight/Emergency Shelter/Transitional Housing Beds added: 85 Beds Homelessness Prevention: 250 Persons Assisted Businesses assisted: 2 Businesses Assisted

OMB Control No: 2506-0117 (exp. 06/30/2018)

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
2	Assist People with Special Needs	2020	2024	Affordable Housing Public Housing Homeless Non-Homeless Special Needs Non-Housing Community Development		Inclusive Growth Accessible Housing Borderless Transit	CDBG: $4,800,000	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 12500 Persons Assisted Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit: 16 Households Assisted Public service activities other than Low/Moderate Income Housing Benefit: 23750 Persons Assisted Rental units rehabilitated: 10 Household Housing Unit Homeless Person Overnight Shelter: 1150 Persons Assisted Businesses assisted: 1 Businesses Assisted

OMB Control No: 2506-0117 (exp. 06/30/2018)

3	Maximize Affordable Housing	2020	2024	Affordable Housing	Mundelein Area Round Lakes Area Waukegan Area Zion Area Fox Lake Area North Chicago Area High Outcome Areas Highwood Area	Inclusive Growth Accessible Housing Borderless Transit	CDBG: $4,900,000 HOME: $8,500,000 Local: $600,000	Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit: 24 Households Assisted Public service activities other than Low/Moderate Income Housing Benefit: 250 Persons Assisted Rental units constructed: 300 Household Housing Unit Rental units rehabilitated: 95 Household Housing Unit Homeowner Housing Added: 15 Household Housing Unit Homeowner Housing Rehabilitated: 100 Household Housing Unit Direct Financial Assistance to Homebuyers: 130 Households Assisted Overnight/Emergency Shelter/Transitional Housing Beds added:

OMB Control No: 2506-0117 (exp. 06/30/2018)

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
								15 Beds Businesses assisted: 2 Businesses Assisted Buildings Demolished: 8 Buildings
4	Create Pathways for Upward Economic Mobility	2020	2024	Affordable Housing Non-Housing Community Development	Mundelein Area Round Lakes Area Waukegan Area Zion Area Fox Lake Area North Chicago Area High Outcome Areas	Inclusive Growth Borderless Transit	CDBG: $900,000	Jobs created/retained: 18 Jobs Businesses assisted: 1 Businesses Assisted Buildings Demolished: 1 Buildings

OMB Control No: 2506-0117 (exp. 06/30/2018)

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
5	Program Administration	2020	2024				CDBG: $2,905,363 HOME: $835,155 ESG: $84,550 Local: $30,000	Other: 5 Other

Table 56 – Goals Summary

Goal Descriptions

1	**Goal Name**	Improve homeless crisis response system
	Goal Description	The June 2019 Gaps Analysis of the Homeless Crisis Response System in Lake County identified several critical gaps that are possible to address in this 2020-24 Consolidated Plan. CSH, a national consulting firm that performed the study, recommended the development of (1) a year-round shelter, in conjunction with 24-hour services, that would promote engagement ---the ingredient in homeless services that is critical for getting people who are homeless into housing; (2) a dedicated shelter for homeless families with minor children; (3) services and housing resources dedicated to homeless youth; (4) a multidisciplinary mobile outreach team to overcome the County's transportation barriers to services, shelter and housing
2	**Goal Name**	Assist People with Special Needs
	Goal Description	To provide both services to people with special needs and accessibility modifications to the homes, facilities and workplaces of people with special needs, including the elderly. A focus of this goal will be leveraging the transportation system to promote growth and to create pathways to opportunity for people with special needs. HUD defines **persons with disabilities, persons with HIV/AIDS, elderly persons, frail elderly persons, persons with alcohol and/ or drug addictions, victims of domestic violence and public housing residents as people with special needs.**

OMB Control No: 2506-0117 (exp. 06/30/2018)

3	**Goal Name**	Maximize Affordable Housing
	Goal Description	To provide a decent home and suitable living environment for low-and moderate-income households by preserving and expanding Lake County's affordable housing stock through acquisition, rehabilitation, new construction, and rental assistance activities.
4	**Goal Name**	Create Pathways for Upward Economic Mobility
	Goal Description	According to CMAP's On To 2050 Plan, "the region cannot succeed without a concerted investment to rebuild jobs, amenities and resources in communities that have been left behind. Investment for continued economic growth and success for the entire region should include investments in communities with limited resources for rebuilding infrastructure and amenities needed for jobs, housing choices and healthy living." Within this goal, a focus will be leveraging the transportation system to promote growth and to create pathways to opportunity for both low/moderate income workers and people with disabilities. Lake County could also consider CMAP's On To 2050 recommendation to provide subsidies to financially struggling municipalities expected to implement regional initiatives such as bike trails.
5	**Goal Name**	Program Administration
	Goal Description	Each source of HUD funding (CDBG, HOME, ESG) provides funding for planning and administration of these grant programs, which are managed by Lake County Community Development Program administration

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

It is estimated that throughout program years 2020-24 Lake County will provide 800 extremely low-income, low-income, and moderate-income families a form of affordable housing as defined by HOME 91.315(b)(2).

OMB Control No: 2506-0117 (exp. 06/30/2018)

SP-50 Public Housing Accessibility and Involvement - 91.415, 91.215(c)

Need to Increase the Number of Accessible Units (if Required by a Section 504 Voluntary Compliance Agreement)

Lake County Housing Authority is compliant with the Section 504 Voluntary Compliance Agreement (VCA) which requires 10% of LCHA units to be accessible.

North Chicago Housing Authority has not been subject to a VCA.

Activities to Increase Resident Involvements

Lake County Housing Authority has applied for the Resident Opportunity and Self Sufficiency (ROSS) grant and will be hiring an additional Resident Coordinator. In addition, LCHA is implementing more health focused activities geared toward a better quality of life for Lake County residents.

North Chicago Housing Authority hosts annual resident advisory meetings.

Is the public housing agency designated as troubled under 24 CFR part 902?

No

Plan to remove the 'troubled' designation

Not Applicable: Lake County Housing Authority is designated as standard under 24 CFR part 902. North Chicago Housing Authority is similarly not designated as troubled.

SP-55 Strategic Plan Barriers to Affordable Housing - 91.415, 91.215(h)

Barriers to Affordable Housing

Public policy at the local land use level has the potential to significantly impact the availability of affordable housing. Lake County's 2014 Analysis of Impediments to Fair Housing Choice ("AI") initially identified 20 impediments to fair housing choice, many of which overlap with this section. For instance, Impediment 4, "Zoning laws can limit the number of housing options for members of the protected classes," describes how local policies may negatively affect the availability of affordable housing. In Lake County's 2020 AI Update, it was found that 13 of the original 20 impediments remain. These remaining 13 impediments, including Impediment 4, are listed below along with the stakeholders required to remove those impediments. Strategies to address these impediments are discussed below in section SP-55, Strategic Plan to Address Barriers to Affordable Housing.

The 2020 AI Update also found that since 2014, many studies have identified zoning and land-use planning as key contributors to lack of housing affordability. George Mason University reviewed the literature and found that most studies show that "both traditional land-use policies…increase the cost of housing." (www.mercatus.org/system/files/Ikeda-Land-Use-Regulation.pdf).

In 2017, the Yale Law Journal published valuable historical context explaining how past land use decisions resulted in "residential stagnation" of disenfranchised populations: "Starting in the 1970s, the combined effect of land-use restrictions in many of the richest metropolitan areas stopped that convergence in its tracks. Though doctors, lawyers and other high-skilled individuals who could afford the higher housing costs could still move to capture higher wages in richer, restrictive states, less-skilled workers could not." (Schleicher, David. The Yale Law Journal. 10/17, Volume 127, #1, p. 78 – 154.)

Relevant to suburban areas like Lake County, the Urban Land Institute's 2016 report, "Housing in the Evolving American Suburb," noted that "considerable evidence indicates that zoning practices common in suburbs, and practiced in many cities as well, limit residential density and require multiple levels of local approval and thereby contribute to racial and economic segregation. (www.urbanland.uli.org)

In terms of access to existing affordable housing units, discrimination can limit the availability of units to low-income renters. Under federal law, housing providers may not discriminate based on race, color, religion, gender, national original, familial states, or disability. Under Illinois law, housing providers further cannot discriminate based on ancestry, age, military or military discharge status, marital status, protective order status, or sexual orientation. There are, however, forms of discrimination that are not forbidden under federal or state law. According to the American Bar Association, Source of Income (SOI) discrimination refers to the practice of refusing to rent a housing unit to an applicant because of that individual's lawful form of income, including Housing Choice Vouchers (HCVs). In order to increase the availability of private units available housing choice voucher holders, states and home rule local governments can pass laws to prohibit discrimination based on Source of Income – Cook County has such a law. Since Lake County is not a home rule county, it would require a new Illinois state law to

OMB Control No: 2506-0117 (exp. 06/30/2018)

prohibit SOI discrimination here. This may limit the ability of renters holding housing choice vouchers to find quality housing in Lake County.

Strategy to Remove or Ameliorate the Barriers to Affordable Housing

Broadly speaking, Lake County is exploring the best ways to address the types of changes to local building codes and zoning ordinances shared in the White House's Housing Development Toolkit (www.whitehouse.gov/sites/whitehouse.gov/files/images/Housing_Development_Toolkit%20f.2.pdf):

- Establish by-right development
- Streamline or shorten permitting processes and timelines
- Eliminate off-street parking requirements
- Recommend high-density and multifamily zoning
- Allow accessory dwelling units
- Establish density bonuses and/or inclusionary zoning
- Establish development tax or value capture incentives
- Examine possible use of property tax abatements (to affordable housing during development stage)

In addition, Lake County has been accumulating examples of best practices in local land use updates. These best practices are listed below.

Zoning and Building Best Practice Examples

NATIONAL BEST PRACTICES

- AARP Model Accessory Dwelling Unit (ADU) ordinance @ www.aarp.org/livablecommunities Accessory Dwelling Units (ADUs) are self-contained second dwelling units located within or attached to a principal single-family dwelling. The ADU is equipped with a kitchen, bathroom and sleeping area. ADUs are discreetly located and coordinated with the principal dwelling to preserve the neighborhood character.]

REGIONAL BEST PRACTICES

- Please see Homes for Changing Region Toolkit @ www.metroplanning.org/homegrown
- **Village of Bolingbrook, IL.** In 2003, Bolingbrook passed an ordinance to codify "visitability" criteria:

1. A no-step entrance leading from the driveway to an entrance with a min 32-inch clear opening.
2. One accessible bathroom on the same level as the no-step entrance.
3. At least one shower in the home with reinforced beams to allow for the installation of grab rails if necessary, at a later date.

4. Exterior doorways at least 36 inches wide and interior doors with a min 32-inch clear opening.
5. Corridors and passageways 42 inches wide on the same level as the no-step entrance.
6. Electrical wall outlets placed no more than 15 inches above finished flooring.
7. Wall switches controlling light fixtures and fans placed 48 inches (max) above finished flooring.

- **Village of Bull Valley, IL**. In an effort to introduce affordable housing to a village principally comprised of large residential lots, Bull Valley created its first ADU. This ADU is a basement apartment into which the owner of the principal residence will move when she leases the main parts of the home to a tenant.

LOCAL BEST PRACTICES

- **Lake County residential occupancy limit**. Lake County's definition of family includes "A group of not more than four (4) unrelated persons living together as a single housekeeping unit in a dwelling unit."
- **City of Evanston ADU**. City council voted on May 14, 2018 to allow rental of accessory dwelling units (ADU) with registration requirement. (www.cityofevanston.org/Home/ShowDocument?id=46030)
- **Village of Park Forest, IL**. Park Forest allowed ADUs in Unified Development Ordinance (UDO). In a PUD of SF homes with an attached ADUs, five ADUs were permitted with deed restrictions requiring owner occupancy and parking requirements met in shared garage.
- **Village of Glenview, IL**. In the development of the Glen, a former naval station, one of several new neighborhoods contained ADUs. Glenview requires the homeowner to occupy one unit, the other of which may be rented. The Village has not encountered any issues with the rental units.

Table B: Original 2014 Action Steps by Impediment (Including Proposed Implementation Partners)

#	REFRESH COMMITMENT TO 2014 ACTION STEPS	County	Municipalities	Fair Housing Agency	Housing Authorities	Regional Transit	Regional Lenders	Regional Employers
1	Continue fair housing training sessions, develop training/outreach benchmarks, host regional housing discussions.	X		X				
3	Encourage affirmative marketing by housing developers, pair County subsidies with private developments and consider a variety of housing types to meet resident needs.	X	X					
4	Recommend fair guidelines for zoning & building codes at county and municipal levels.	X	X					
11	Encourage housing authorities to participate in fair housing activities and to advertise openings in any language that is the primary language of 10% or more of County residents.	X		X	X			
12	Identify opportunities to expand public transportation options in the area. Assist with implementation of para-transit market study.					X		
13	Finish review of County publications, and expand availability of materials in primary language of 10% or more of County residents.	X						
14	Consider establishing programs in which developers acquire reduced-cost land through County tax sale process for new affordable housing. Conduct forums with private developers to identify the barriers to creating lower cost for-sale and rental housing. Expand relationships with housing developers, encourage affordable housing development, consider inclusionary zoning mechanisms.	X	X					
15	Support home purchase counseling; expand marketing of loan products.						X	
16	Develop tool kit for municipalities to respond to State of IL Affordable Housing Planning and Appeal Act.	X	X					
17	Conduct extensive education and outreach in consumer, government and private sectors.	X	X	X		X	X	
18	Foster relationships with real estate professionals to expand housing choice, continue testing, engage community groups.	X	X					
19	Provide training sessions for real estate professionals & public.	X		X				
20	Assist in expanding the supply of housing near employment centers; Consider infrastructure project elements that support public transportation.	X	X		X	X		X

Table 4 profiles action steps proposed in the **2014 AI** that remain timely and pertinent in today's environment. These actions take considerable collaboration, research, public input and staff time in order to be implemented.

LAKE COUNTY, IL ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE (AI) 2020 UPDATE

Strategies from 2014 Analysis of Impediments to Fair Housing Choice

Table C: Proposed Additional Action Steps by Impediment (Including Proposed Implementation Partners)

#	POTENTIAL ADDITIONAL ACTION STEPS (BY IMPEDIMENT)	County	Municipalities	Fair Housing Agency	Housing Authorities	Regional Transit	Regional Lenders	Regional Employers
1	Explore social media and other new outreach & marketing opportunities for fair housing education. Consider leveraging real estate broker industry for assistance with fair housing outreach and education.	X		X				
3	Consider requiring developers to consult with transit agencies to verify that proposed developments do not negatively affect existing or planned transit service. Consult directly with developers to ensure that development does not negatively affect bike or pedestrian networks. *(CMAP On To 2050)*	X	X					
4	Consider updating plans, zoning codes, and development regulations to incentivize greater densities and mixed uses near rail stations and along high-priority bus corridors with a preference toward employment rich land uses. *(CMAP On To 2050)* Codes could also contain "visitability" and/or accessibility requirements.	X	X					
11	Continue funding Prairie State Legal Services to provide frequent training sessions for residents and staff of all three housing authorities.	X		X	X			
12	Invest in strategic "borderless transit" pilots (e.g. CDBG Public Services) to improve connectivity between job hubs and both people with disabilities and low-income communities.					X		
13	Increase visibility of County's "You are Welcome Here" campaign. Explore working with the Lake County Board's Diversity & Inclusion Committee.	X						
14	Prioritize affordable housing in opportunity areas. Work with developers to create lower-cost for-sale and rental housing that fits well in local communities. Consider innovative types of housing such as cohousing (e.g. www.cohousing.org), accessory dwelling units (ADUs), climate resilient housing and tiny house developments.	X	X					
15	Assess the extent to which this issue is being monitored by banking regulators, and extent to which County can help.						X	
16	Work with Lake County Municipal League to build capacity of local landbank to redevelop vacant land.	X	X					
17	Continue to address impediments that affect all protected classes, not just lower-income members of protected classes.	X	X	X		X	X	
18	Continue expanding homeownership among protected classes, with bilingual down-payment assistance and the community land trust model.	X	X					
19	Expand training sessions on reasonable accomodations for people with disabilities to real estate professionals and general public.	X		X				
20	Encourage employers to locate jobs near transit and collaborate with workforce development service providers to determine transportation needs and address them.	X	X		X	X		X

According to CMAP *On To 2015*, emerging research shows that placing employment near transit may have an even stronger impact on the success of transit. Planning for bus and rail transit-supportive land uses must also involve enhancing pedestrian and bike connections to transit, thereby making it easier and safer for employees and residents near transit corridors to walk or bike to rail or bus stations.

LAKE COUNTY, IL ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE (AI) 2020 UPDATE

Housing Strategies from 2020 AI Update

SP-60 Homelessness Strategy - 91.415, 91.215(d)

Describe how the jurisdiction's strategic plan goals contribute to:

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

The County's strategic plan goals were designed to improve the performance of the homeless response system to better address the needs of individuals and families experiencing homelessness in Lake County. In early 2019, the County partnered with the Lake County Coalition for the Homeless (LCCH), acting as the Homeless Continuum of Care, to procure an assessment of the homeless response system in Lake County. The Corporation for Supportive Housing (CSH) was selected as the vendor to conduct the analysis and their findings address the needs and special populations outlined in the consolidated plan. The following four recommendations from CSH relate to engagement and assessment of homeless persons:

1. Increase Outreach and Mobile Crisis Team: Given the geographic spread of the county and the transportation challenges that have been identified by stakeholders, having a comprehensive, multidisciplinary mobile outreach team would increase access to services, shelter, and housing throughout the county. The outreach team could include case managers/housing navigators, a behavioral health specialist, and peer support workers. While the specific team composition is flexible and may be shaped by funding availability, it is critical that the team is able to cover the whole county and coordinate with multiple systems including law enforcement, health care providers, and service agencies. The outreach team would ideally be able to provide mobile VI-SPDAT assessments, connect with clients that are not actively engaged with Coordinated Entry, and provide transportation to shelter or the Crisis Center.

2. Develop Year-Round Emergency Services and Day Center: Lake County's current shelter system is seasonal, based on a rotating-site model, and has limited space to secure belongings. This model creates barriers and does not promote consistent engagement with clients, limiting the ability of staff to connect clients to housing solutions and supportive services. The development of a year-round shelter, in conjunction with 24-hour services, would allow for consistent engagement. Ideally, the shelter and day center would be a single 24-hour site that provided emergency shelter services at night and day center services during the day; however, alternate models may be able to meet these needs as well.

3. Access through Crisis Center: A crisis center could also offer an additional point to access for assessment to services and housing. The community has identified a lack of locations and services that can assist those with serious mental illness or those under the influence of drugs or alcohol, which results in unnecessary jail or hospital stays. The development of a Crisis Center could address these issues by potentially providing a jail alternative to those with serious mental illness and providing medically assisted treatment for safe detox and sobering. Additionally, a crisis center could serve as a Coordinated Entry access point, increasing engagement and access.

OMB Control No: 2506-0117 (exp. 06/30/2018)

4. Increase Access through Township Pilot: Lake County's township offices are often geographically accessible to those experiencing homelessness in less dense areas of the county; however, the townships' varying capacities may serve as a barrier to those seeking services. Some townships have identified homelessness as an issue in their community and have expressed interest in further engagement with the homeless response system. Such township offices are well positioned to serve as an access point to Coordinated Entry and could facilitate VI-SPDAT assessments and warm hand-offs to additional services. A township pilot program could be used to explore expanding the relationship between townships and the CoC, including standardizing processes across townships to facilitate access to emergency shelter, housing, and services.

Addressing the emergency and transitional housing needs of homeless persons

CSH's gaps analysis report included three recommendations that relate to the emergency and transitional housing needs of homeless persons:

1. **Create "Bridge" Housing for Persons Matched in Coordinated Entry**: Data indicate that clients could be moved into housing more quickly if agency staff were able to reliably contact them. Clients who are waiting for a housing unit to become available must utilize the rotating-site shelter model, a model that is not conducive to stability and which reduces the ability of agency staff to quickly locate clients once they are matched to housing. This issue could be ameliorated with "bridge" housing, interim housing that is available to clients that are matched to a housing resource. Bridge housing could reduce the time from voucher to move-in, increase landlord and participant confidence, and increase the success of each match. Bridge housing can be modeled in several ways to account for the funding resources and unique needs of community; several of these models may be feasible in Lake County.

2. **Convert Transitional Housing to Permanent Supportive Housing**: When transitional housing or shelter beds become default long-term housing, it may be time to consider converting to permanent housing. An assessment of local transitional housing programs' funding source, agency capacity, and other issues can be done to evaluate whether resources should be converted to permanent housing, adding supportive housing stock to the community.

3. **Support Combined Transitional Housing-Rapid Rehousing Applications in CoC NOFA**: CoC funding does not fund emergency shelter, however does offer a "joint component" Transitional Housing/Rapid Re-Housing model, which may be a creative way to modestly expand crisis resources, particularly for families with minor children and survivors and survivor families of domestic violence.

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 2019 Lake County was successful in certifying an end to veteran homelessness through the U.S. interagency Council on Homelessness and the Built for Zero campaign. With this accomplishment, the focus shifts to sustaining functional zero for veterans. In conducting the gaps analysis, CSH did an extensive review of Lake County's homeless data, including System Performance Measures, which assesses length of time homeless. The following four recommendations are related to the goals to address the permanent housing needs of the above populations.

1. **Create Dedicated Services for Families with Minor Children**: Lake County currently has no emergency shelter, day center, or crisis response location dedicated to families with minor children, yet there is an identified need for these resources. Committing a location to families would improve the ability of providers to address the distinct needs of this special population.

2. **Create Dedicated Services for Youth**: Lake County currently has no service or housing resources dedicated to unaccompanied youth. This special population is recognized as having unique needs and is not well served under models traditionally used for adults. Expanding the capacity of service providers to create programs and projects dedicated to youth would improve Lake County's ability to respond to youth homelessness.

3. **Create Permanent Housing Solutions Indicated by Data for Unmet Needs**: Data indicate an unmet need for supportive housing. Single-site supportive housing developments that incorporate daily supportive services for both tenants and people in the community can be effective for clients with intensive service needs. Small and medium-size developments of 25-30 units often provide services that are more intensive and have leasing accommodations and property management strategies for people with higher needs. The Illinois Housing Development Authority has funded several small single-site projects that could be used as models for Lake County to explore.

4. **Engage PHAs and Create Set-Asides**: Lake County's Public Housing Agencies (PHAs) report a low rate of homeless participants enrolling in the Housing Choice Voucher (HVC) program; one PHA reported 25% in the previous the fiscal year, and the other two reported 0%. To increase PHA engagement, the CoC and Lake County could:

- Work with the PHAs to develop a more comprehensive policy preference for those experiencing homelessness
- Continue to apply for federal funding opportunities where new resources can target specific subpopulations that are identified through LCCH priorities and services pathways
- Work with the PHAs to provide "Moving On" opportunities for people in supportive housing who are able to live more independently, opening up a space for more vulnerable individuals who need the services
- Identify opportunities to set aside HCV allocations for persons experiencing homelessness
- Provide pre-inspections to increase the likelihood of a unit being approved
- Assist in document collection, application submission

- Assist in managing relationships with landlords
- Help establish a Handyman fund
- Help establish a damage mitigation fund
- Apply for more CoC Rental Subsidy units in the HUD CoC NOFA

Help low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families who are likely to become homeless after being discharged from a publicly funded institution or system of care, or who are receiving assistance from public and private agencies that address housing, health, social services, employment, education or youth needs

System performance measure consistently indicate that over 65% of people experiencing homelessness in Lake County are experiencing it for the first time. CSH identified this as an opportunity in the gaps analysis report and recommended Lake County re-evaluation use of Emergency Solution Grants (ESG) for homelessness prevention. The drawback of using ESG for homelessness prevention is that ESG funding has restrictions which tie the hands of the provider, making it difficult both to spend the ESG (if sufficient clients matching narrow ESG eligibility criteria) funds on time and to help low-income families and individuals at risk of homelessness. In response to this CSH recommendation, Lake County in this 2020-24 HUD Strategic Plan proposes investment of CDBG Public Service dollars (while also focused on piloting transit improvements and diversity/inclusion programming) in homelessness prevention. As result, ESG funds are targeted at rapid rehousing and shelter - both of which have dire need for ESG funding.

OMB Control No: 2506-0117 (exp. 06/30/2018)

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

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

Lake County will continue all compliance activities prescribed in 24 CFR Part 35. All potential projects are evaluated for Lead Based Paint (LBP) hazards. If LBP hazards are identified to be present, abatement activities (as appropriate) are incorporated into the project scope.

The abatement of LBP hazards via the Owner Occupied Rehabilitation Program (OORP) continues to be the most effective means for Lake County to increase access to housing for LMI households. LBP hazard identification and abatement are included into the standard procedure for the Lake County OORP. The OORP is supported with CDBG and/or HOME funds and typically addresses approximately twenty households per program year.

How are the actions listed above related to the extent of lead poisoning and hazards?

There is a direct correlation between the spatial distribution of homes built prior to 1978 and areas of higher concentrations of LMI households. By identifying and targeting the geographic areas with the highest LMI concentrations for funding Lake County is simultaneously targeting areas with the greatest likelihood of LBP hazards being present.

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

The Lead Safe Housing Rule found at 24 CFR Part 35 requires that lead hazard evaluation and reduction activities be carried out for all developments constructed before 1978 that are acquired or rehabilitated with federal funds. Lake County mandates that applications for rehabilitation funds for existing buildings constructed prior to 1978 must include a lead hazard evaluation, by appropriate lead-certified personnel. The application must also include a detailed lead hazard reduction plan, in accordance with the regulations, and separately identify within the rehabilitation budget, the costs associated with reduction of lead hazards in accordance with the regulation and guidelines. All allocations will be contingent upon the applicant agreeing to complete lead hazard reduction, evidenced by a clearance report performed by appropriate lead-certified personnel. In a development where funds will be used on only a portion of the units, the lead-based paint requirements apply to all units and common areas in the development.

Specific requirements vary depending on the type of work performed and the level of federal subsidy. For CDBG and HOME projects, the lead-based paint requirements established by the regulation fall into the major categories listed below:

Some CDBG and HOME projects may be exempt from the Lead Safe Housing Rule if they meet the criteria listed in 24 CFR 35.115

OMB Control No: 2506-0117 (exp. 06/30/2018)

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

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

The Strategic Plan goal, "Prioritize Pathways for Upward Economic Mobility" focuses on reducing the number of poverty-level families by increasing transportation access to good jobs, introducing entrepreneurship assistance and microloan programs and funding homelessness prevention. CDBG funding will be used to support agencies that both reduce the number of families living in poverty and prevent poverty-level families from slipping into homelessness.

For poverty-level families, a single incident such as illness, a car accident, funeral expenses can destabilize them so the emergency assistance offered by Catholic Charities (and funded with CDBG Public Services) and townships provide a crucial safety net. During the 2020-24 Plan period, Lake County intends to link workforce ecosystem supports more closely with poverty-level families, especially the homeless. When car problems can lead to loss of a job, more supports should be available to get people to work and keep their jobs.

In Lake County, basic needs include having a car, which adds to a family's fixed expenses. Financial troubles manifest as food insecurity, for which there is a broad scattering of food banks, even in parts of the County considered "wealthy". Because lack of connection between housing and jobs is such a pronounced issue in this large urban county, Lake County's goals include increasing transit, economic development and creative placemaking in LMA areas in ways that reflect local values. At the same time, Lake County prioritizes affordable housing investment in high opportunity areas. This two-pronged Geographic approach to investing HUD housing dollars was most recently updated in the 2019 of Lake County's 2014 Analysis of Impediments to Fair Housing Choice (AI).

In Lake County, residents living in families without a history of attending college/university are in need of special guidance that Lake County seeks to support. Community programs can explore ways to better prepare high school students for college. The 2019 Community Needs Assessment focused on the Latinx community performed by service provider Mano a Mano is considering – in its Productive Parents program supported by CDBG Public Services – “offering greater training, counseling and exposure to high school students about post-graduation opportunities available to them such as college or trade school.”

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

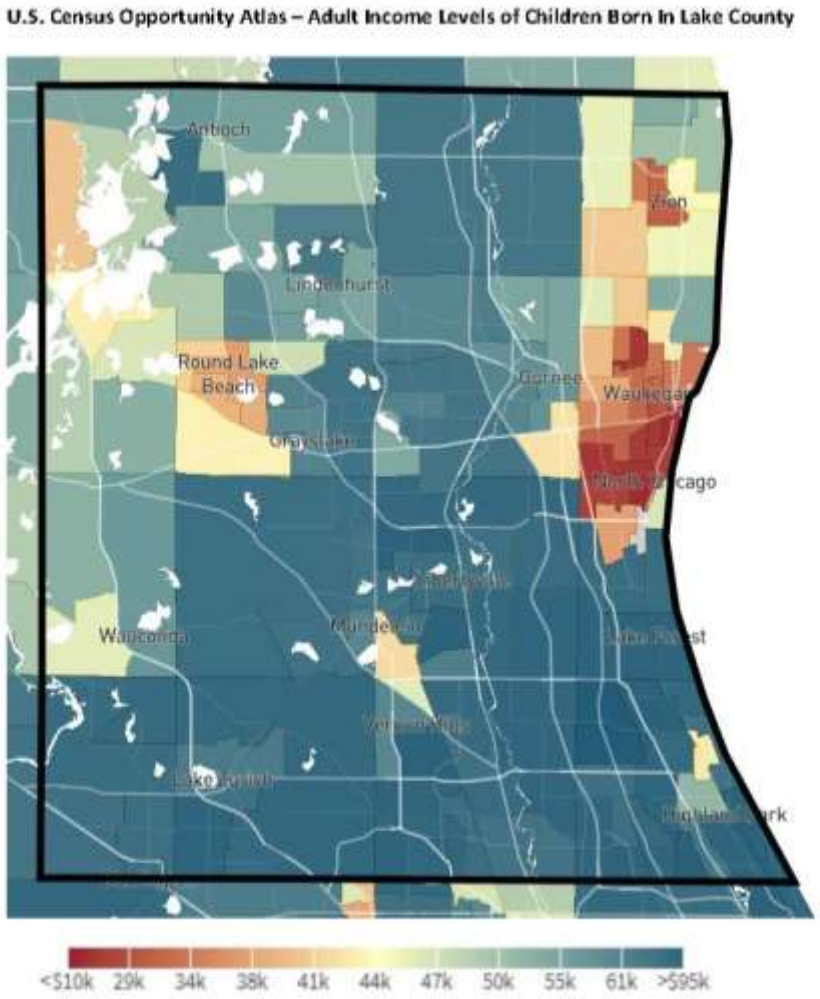
Lake County's 2019 AI Update provides crucial framework for Lake County's affordable housing plan to locate affordable housing in high outcome areas while also reducing poverty by providing better, more dependable transportation to jobs from areas with existing affordable housing.

The 2019 AI pointed out that potentially the most influential change since 2014, on the national level, was the release by the United States Census in 2018 of its “Opportunity Atlas,” an interactive mapping

OMB Control No: 2506-0117 (exp. 06/30/2018)

tool that “traces the roots of outcomes such as poverty and incarceration back to neighborhoods in which children grew up.” One of the key findings was that “moving to a better neighborhood earlier in childhood can increase a child’s income by several thousand dollars.” (www.opportunityinsights.org) Lake County’s profile in this atlas is contained below.

In On To 2050, CMAP both pointed out inequity in the Chicago region as worse than other metropolitan regions (www.cmap.illinois.gov/2050/draft/principles/inclusive-growth) and stated, "Inequity persists when the location of someone’s home, their race or ethnicity, or socioeconomic status determines their economic success, health and overall quality of life…We must take proactive steps to open doors in communities where opportunity hasn’t knocked for generations."



U.S Opportunity Atlas: LAKE COUNTY, IL

SP-80 Monitoring - 91.230

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

Lake County is responsible for ensuring that all activities further the goals and priority needs of the Consolidated Plan. Additionally, all HOME, CDBG, ESG, and NSP program activities, including those conducted by subrecipients and developers, must be compliant with the applicable federal regulations. Lake County ensures compliance with federal regulations at every stage of a project, including prior to funding a project, during project activities, and after project completion. The activities conducted at each stage of the project depend on the project or program type and funding source.

The first step to ensuring compliance with requirements is an extensive annual award project selection process. Housing, public improvements, human services, and homelessness programs and projects apply for funding in a competitive application process. Applications are scored based on scoring criteria. Demonstrated ability to abide by requirements, such as minority business outreach and fair housing, is reflected in an applicant's score. Additionally, all projects must align with the goals and priority needs of the Consolidated Plan and are only awarded if the activity furthers these goals.

During program activities and after project completion, subrecipients and developers are monitored for compliance to ensure activities abide by the funding requirements and grant agreement. The monitoring policies describe the standards and procedures used to monitor activities. Lake County conducts four types of monitoring: program monitoring, administrative and financial monitoring, activity-specific and project monitoring, and long-term monitoring. Monitoring activities and follow up may be conducted via desk reviews or on-site monitoring.

A risk assessment of Lake County's funded activities informs the Annual Monitoring Plan, which includes the monitoring strategy and methodology. The risk assessment considers various factors such as program complexity, funding, quality of reporting, and past compliance issues. The program or project type and funding source further determine the type of monitoring that is conducted. Programs currently being implemented receive annual on-site monitoring visits, and projects currently under development are monitored at periodic timeframes throughout the process, not less than once annually.

Projects that are complete and no longer under development enter a period of affordability where they must remain affordable according to the regulations. These projects undergo additional monitoring to ensure long-term compliance with the requirements of the applicable funding source. The length of the period of affordability and activities conducted during long-term compliance procedures vary depending on the type of project. Homebuyer projects are monitored for principal residency and compliance with resale or recapture requirements; rental projects are monitored for a multitude of factors, including compliance with rent and income restrictions, physical condition, and other management practices.

OMB Control No: 2506-0117 (exp. 06/30/2018)

All monitoring activities align with HUD guidance and utilize HUD resources where possible.

Expected Resources

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

Introduction

The anticipated resources are based on the FY2020 allocation and the assumption that funding levels will remain consistent for FY2021-24.

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan $	Narrative Description
			Annual Allocation: $	Program Income: $	Prior Year Resources: $	Total: $		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	2,905,363	29,656	183,575	3,118,594	11,621,452	CDBG funds will be used to support community development in Lake County's target areas and to support affordable housing efforts throughout Lake County.

OMB Control No: 2506-0117 (exp. 06/30/2018)

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan $	Narrative Description
			Annual Allocation: $	Program Income: $	Prior Year Resources: $	Total: $		
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	1,670,311	113,111	88,732	1,872,154	6,681,244	HOME funds will be used to develop affordable housing for low-income communities, including new construction and rehabilitation of single- and multi-family units.

OMB Control No: 2506-0117 (exp. 06/30/2018)

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan $	Narrative Description
			Annual Allocation: $	Program Income: $	Prior Year Resources: $	Total: $		
ESG	public - federal	Conversion and rehab for transitional housing Financial Assistance Overnight shelter Rapid re-housing (rental assistance) Rental Assistance Services Transitional housing	225,467	0	0	225,467	901,868	ESG funds will be used to assist persons experiencing homelessness with outreach, shelter services and rapid rehousing services.

OMB Control No: 2506-0117 (exp. 06/30/2018)

Other	public - local	Acquisition Admin and Planning Conversion and rehab for transitional housing Homebuyer assistance Homeowner rehab Housing Multifamily rental new construction Multifamily rental rehab New construction for ownership Rapid re-housing (rental assistance) Rental Assistance Services TBRA Transitional housing	301,000	0	0	301,000	0	Lake County Affordable Housing Fund, as allocated by the Lake County Board. Typically, $300,000 of general funds are allocated in the County's annual budget process. The amount of funds made available after the 2020 program year is to be determined in the context of the County budgeting process.

OMB Control No: 2506-0117 (exp. 06/30/2018)

Table 57 - Expected Resources – Priority Table

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

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

The ESG Program regulations require 100% match. This requirement is met through local funds (Lake County Affordable Housing fund) and private funds.

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

OMB Control No: 2506-0117 (exp. 06/30/2018)

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

Lake County owns or is tax trustee for several parcels of land throughout its jurisdiction for which there is currently no process in place to address directly the needs identified in the Consolidated Plan. Several Lake County municipalities in this Plan's Target Areas of North Chicago, Round Lake Beach and Zion have formed the new Lake County Land Bank. Potential involvement by Lake County is being explored, especially the possibility of direct sales of tax-foreclosed properties by Lake County to the Land Bank. According to CMAP, "Land banks bring important skills to address vacancy and abandonment that can be prevalent in disinvested areas and have been successful in the region with Cook County Land Bank and the South Suburban Land Bank Development Authority. Rebuilding disinvested areas will be critical to long-term regional prosperity by ensuring that jobs and economic opportunities are available in communities where economically disconnected residents live."

Discussion

The development of new affordable housing units is made possible by various funding sources beyond those available through the participating jurisdiction. In addition to applying for HOME funds from the county, affordable housing developers often utilize state funding sources such as Low Income Housing Tax Credits (LIHTC) or Illinois Affordable Housing Tax Credits (IAHTC), which are available through Illinois Housing Development Authority (IHDA). Low Income Housing Tax Credits are applied for in a competitive process; projects with high scores are awarded funding. The Low Income Housing Tax Credits Qualified Allocation Plan (QAP), which is updated annually, outlines the criteria IHDA uses to evaluate projects applying for tax credits. Criteria included in this plan are sometimes location-based and can increase or decrease the likelihood that projects in a specific area are awarded funding. For instance, the 2020-2021 QAP awards additional points to projects in Opportunity Areas (OAs). The Opportunity Areas change annually, and in recent years Lake County has had limited areas which qualify as Opportunity Areas, limiting the ability of affordable housing developers to earn high scores on IHDA applications and bring state tax credits funds to developments in Lake County.

OMB Control No: 2506-0117 (exp. 06/30/2018)

Annual Goals and Objectives

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

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Improve homeless crisis response system	2020	2024	Homeless	Mundelein Area Round Lakes Area Waukegan Area Zion Area Fox Lake Area North Chicago Area Highwood Area	End Homelessness in Lake County Inclusive Growth	CDBG: $408,243 ESG: $208,557 Local: $150,000	Public service activities other than Low/Moderate Income Housing Benefit: 41 Persons Assisted Rental units rehabilitated: 20 Household Housing Unit Tenant-based rental assistance / Rapid Rehousing: 18 Households Assisted Homeless Person Overnight Shelter: 910 Persons Assisted Overnight/Emergency Shelter/Transitional Housing Beds added: 10 Beds Homelessness Prevention: 50 Persons Assisted Businesses assisted: 3 Businesses Assisted

OMB Control No: 2506-0117 (exp. 06/30/2018)

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
2	Assist People with Special Needs	2020	2024	Affordable Housing Public Housing Homeless Non-Homeless Special Needs Non-Housing Community Development	Mundelein Area Round Lakes Area Waukegan Area Zion Area Fox Lake Area North Chicago Area High Outcome Areas Highwood Area	Inclusive Growth Accessible Housing	CDBG: $968,575	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 2565 Persons Assisted Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit: 16 Households Assisted Public service activities other than Low/Moderate Income Housing Benefit: 4777 Persons Assisted Rental units rehabilitated: 2 Household Housing Unit Homeless Person Overnight Shelter: 230 Persons Assisted Businesses assisted: 1 Businesses Assisted

OMB Control No: 2506-0117 (exp. 06/30/2018)

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
3	Maximize Affordable Housing	2020	2024	Affordable Housing	Mundelein Area Waukegan Area Zion Area North Chicago Area High Outcome Areas	Accessible Housing	CDBG: $971,303 HOME: $1,705,123 Local: $121,000	Public service activities other than Low/Moderate Income Housing Benefit: 51 Persons Assisted Rental units constructed: 84 Household Housing Unit Rental units rehabilitated: 84 Household Housing Unit Homeowner Housing Rehabilitated: 7 Household Housing Unit Direct Financial Assistance to Homebuyers: 26 Households Assisted Overnight/Emergency Shelter/Transitional Housing Beds added: 15 Beds Businesses assisted: 2 Businesses Assisted Buildings Demolished: 2 Buildings

OMB Control No: 2506-0117 (exp. 06/30/2018)

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
4	Create Pathways for Upward Economic Mobility	2020	2024	Affordable Housing Non-Housing Community Development	Mundelein Area Round Lakes Area Waukegan Area Zion Area Fox Lake Area North Chicago Area Highwood Area	Inclusive Growth	CDBG: $189,400	Businesses assisted: 4 Businesses Assisted Buildings Demolished: 1 Buildings

OMB Control No: 2506-0117 (exp. 06/30/2018)

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
5	Program Administration	2020	2024		Mundelein Area Round Lakes Area Waukegan Area Zion Area Fox Lake Area North Chicago Area High Outcome Areas Highwood Area	End Homelessness in Lake County Inclusive Growth Accessible Housing Borderless Transit	CDBG: $581,073 HOME: $167,031 ESG: $16,910 Local: $30,000	Other: 1 Other

Table 58 – Goals Summary

OMB Control No: 2506-0117 (exp. 06/30/2018)

Goal Descriptions

1	**Goal Name**	Improve homeless crisis response system
	Goal Description	Lake County is actively seeking to address homeless by prioritizing system wide improvements to the Homeless Crisis Response System. In June of 2019, an assessment of the Homeless system was performed by a national consulting firm. The report identified several gaps in the existing system. Goal #1 of Program Year 2020 (PY2020) is working with the Lake County Coalition for the Homeless to make systematic improvements and address the identified.
2	**Goal Name**	Assist People with Special Needs
	Goal Description	Lake County will continue to utilize CDBG funds to assist people with special needs (**persons with disabilities, persons with HIV/AIDS, elderly persons, frail elderly persons, persons with alcohol and/ or drug addictions, victims of domestic violence and public housing residents**---as defined by HUD). CDBG Public Services are used in this Plan to prevent homelessness, help the homeless, transport the elderly to appointments, transport out-of-school youth to job sites, provide fair housing and housing condition/eviction legal assistance. In addition Lake County will look to serve persons with disabilities beyond the 15% public service cap by funding capital improvements to public facilities assisting low-moderate income persons and special needs facilities serving seniors, victims of domestic violence, persons with substance abuse issues, persons with developmental disabilities, persons with physical disabilities, and persons with severe mental illness.
3	**Goal Name**	Maximize Affordable Housing
	Goal Description	The third goal is to provide decent homes and suitable living environments for low-and moderate-income households by preserving and expanding Lake County's affordable housing stock through acquisition, rehabilitation, new construction, and rental assistance activities. Lake County will continue to implement a two-pronged approach to address affordable housing; (1) improve the existing housing stock in areas with existing affordable options and (2) promote the development of new units and housing types in high outcome areas where affordable options are limited.

OMB Control No: 2506-0117 (exp. 06/30/2018)

4	**Goal Name**	Create Pathways for Upward Economic Mobility
	Goal Description	Lake County is in agreement with the statement from CMAP's On To 2050 Plan, "the region cannot succeed without a concerted investment to rebuild jobs, amenities and resources in communities that have been left behind. Investment for continued economic growth and success for the entire region should include investments in communities with limited resources for rebuilding infrastructure and amenities needed for jobs, housing choices and healthy living." Within this goal, a focus will be leveraging the transportation system to promote growth and to create pathways to opportunity for both low/moderate income workers and people with disabilities. In support of all four goals, and especially to address the need for increased transportation options for low/moderate income workers, CDBG Public Service dollars will be targeted in transportation, adaptive equipment for people with disabilities and diversity/inclusion programming addressing the need for inclusive growth.
5	**Goal Name**	Program Administration
	Goal Description	

OMB Control No: 2506-0117 (exp. 06/30/2018)

AP-35 Projects - 91.420, 91.220(d)

Introduction

It is anticipated that Lake County will administer approximately $24,700,000 of funding during Program Years 2020-2024. This HUD Strategic Plan is focused on addressing tough problems, the solutions to which requires new partners, new agency capacity and new project sites that can come together over the next five years to achieve the four goals. Last December 2019, Lake County issued a call for strategic projects addressing the goals and needs outlined in this Plan. Lake County received 36 responses, many of which are contained in this 2020 Action Plan.

In addition, Lake County annually solicits funding applications from community partners for projects that support the stated needs and goals of the Consolidated Plan. The amount of funding requested consistently exceeds the amount of funds available. Applications are scored according to a defined criterion and presented to of four Advisory and Recommendation Committees (ARCs) for recommendation to the Housing and Community Development Commission (HCDC). Following two public hearings, the HCDC makes their funding recommendations to the Lake County Board (LCB) in the form of the Annual Action Plan (AAP). The (LCB) makes final approvals of the AAP and the projects detailed below.

For PY2020, Lake County allocates $5,517,215 including $301,000 of Lake County Affordable Housing Program funds towards this Annual Action Plan. The maximum of 20% CDBG, 10% HOME and 7% ESG to Grant Administration.

A total of $637,930 of HOME CHDO Reserve funds (CR) have been allocated, which is greater than the HOME regulated CR minimum.

A total of $25,000 of HOME CHDO Operating (CO) funds have been allocated, which is less than the HOME regulated maximum.

It is anticipated that Lake County will administer approximately $24,700,000 of funding during Program Years 2020-2024.

#	Project Name
1	ESG20 - Lake County, IL
2	Facility Improvements - Homeless
3	Homelessness Prevention
4	Housing Advocacy
5	Nonprofit Capacity Building
6	Permanent Supportive Housing
7	Transitional Housing
8	Facility Improvements - Accessibility

OMB Control No: 2506-0117 (exp. 06/30/2018)

#	Project Name
9	Facility Improvements - Housing
10	Lake County Crisis Center
11	North Chicago - Infrastructure Improvements
12	Public Services
13	Acquisition of Affordable Rental Housing
14	Down payment Assistance
15	Lake Forest Senior Cottages
16	Owner Occupied Rehabilitation Program
17	Affordable Senior Housing – Mundelein
18	Fair Housing
19	Waukegan Housing Authority - Armory Terrace Reconstruction
20	City of Zion - 27th Street
21	City of Zion - Kenosha Rd. Demolition
22	Small Business Loan Program
23	City of Zion - Galilee Demolition
24	Program Administration

Table 59 – Project Information

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

Allocation priorities are primarily a function of the scoring of the applications received from community partners. Scoring criteria was formulated from the priority needs and goals identified during the consultation process and how well each potential project addresses those needs/goals.

The amount of funding that can is made available represents the main obstacle to addressing underserved needs. The amount of funding requested received by Lake County consistently exceeds the amount funds that can be made available.

AP-38 Project Summary

Project Summary Information

1	**Project Name**	ESG20 - Lake County, IL
	Target Area	Mundelein Area Round Lakes Area Waukegan Area Zion Area Fox Lake Area North Chicago Area High Outcome Areas Highwood Area
	Goals Supported	Improve homeless crisis response system
	Needs Addressed	End Homelessness in Lake County
	Funding	ESG: $225,467 Local: $150,000
	Description	Rapid rehousing, emergency shelter, HMIS and outreach.
	Target Date	4/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	Rapid rehousing - 18 households Shelter - 910 persons assisted Outreach - 125 persons assisted
	Location Description	Countywide

OMB Control No: 2506-0117 (exp. 06/30/2018)

	Planned Activities	Catholic Charities - $65,000 ESG and $150,000 AHP - Rapid Rehousing, subrecipient will help families/individuals experiencing homelessness locate housing in the community, negotiate with landlords and provide home-based cased management to promote housing retention. PADS Lake County - $40,579 ESG and A Safe Place $25,362 ESG - Shelter, provide emergency shelter, assessments and referrals to homeless. PADS Lake County - $57,327 ESG – Outreach, provide a connection to the homeless on the street, in their cars, in abandoned buildings and other places not meant for human habitation. Lake County - $20,289 ESG - Homeless Management Information System (HMIS) - Collect client-level data and data on the provision of housing and services to homeless individuals and families and persons at risk of homelessness. Lake County - $16,910 ESG - Program Administration
2	**Project Name**	Facility Improvements - Homeless
	Target Area	Mundelein Area Round Lakes Area Waukegan Area Zion Area Fox Lake Area North Chicago Area Highwood Area
	Goals Supported	Improve homeless crisis response system Assist People with Special Needs
	Needs Addressed	End Homelessness in Lake County
	Funding	CDBG: $176,243
	Description	Facility improvements for the homeless support system.
	Target Date	4/30/2021

OMB Control No: 2506-0117 (exp. 06/30/2018)

	Estimate the number and type of families that will benefit from the proposed activities	Homeless Person Overnight Shelter: 230 persons assisted Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 550 persons assisted
	Location Description	1800 Grand Ave., Waukegan, IL 1720 Green Bay Rd., North Chicago, IL
	Planned Activities	PADS Lake County - $28,243 CDBG Renovation of the restroom facilities at the PADS Lake County Day Center. The renovation would convert existing shower stalls into two separate restrooms for client use. Midwest Veterans Closet - $75,000 CDBG - Assist in the development of a new facility to house the Midwest Veterans Closet A Safe Place - $73,000 CDBG - Capital improvements at a shelter for victims of domestic violence
3	**Project Name**	Homelessness Prevention
	Target Area	Mundelein Area Round Lakes Area Waukegan Area Zion Area Fox Lake Area North Chicago Area High Outcome Areas Highwood Area
	Goals Supported	Improve homeless crisis response system
	Needs Addressed	End Homelessness in Lake County
	Funding	CDBG: $140,000
	Description	Homelessness prevention services.
	Target Date	4/30/2021

OMB Control No: 2506-0117 (exp. 06/30/2018)

	Estimate the number and type of families that will benefit from the proposed activities	50 persons assisted
	Location Description	
	Planned Activities	Catholic Charities - $140,000 CDBG - Subrecipient will provide homelessness prevention services in the form of short-term rental assistance and housing stabilization case management services to individuals and families as risk of becoming homeless.
4	**Project Name**	Housing Advocacy
	Target Area	Mundelein Area Round Lakes Area Waukegan Area Zion Area Fox Lake Area North Chicago Area High Outcome Areas Highwood Area
	Goals Supported	Improve homeless crisis response system
	Needs Addressed	Accessible Housing
	Funding	CDBG: $40,000
	Description	Legal services
	Target Date	4/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	31 persons assisted

OMB Control No: 2506-0117 (exp. 06/30/2018)

	Location Description	
	Planned Activities	North Shore Legal Aid Clinic - $20,000 CDBG and Prairie State Legal Services - $20,000 CDBG - Assist low and mod-income renters with problems arising from landlord and tenant relations focusing on evictions, but also including security deposits, lease disputes, and wrongful retaliation. No-cost legal assistance to Lake County residents who are low/no income individuals.
5	**Project Name**	Capacity Building for Nonprofits
	Target Area	Mundelein Area Round Lakes Area Waukegan Area Zion Area Fox Lake Area North Chicago Area Highwood Area
	Goals Supported	Improve homeless crisis response system Assist People with Special Needs Maximize Affordable Housing
	Needs Addressed	End Homelessness in Lake County Inclusive Growth
	Funding	CDBG: $225,000
	Description	Technical assistance for local nonprofits to increase their capacity to provide services.
	Target Date	4/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	7 businesses
	Location Description	N/A

OMB Control No: 2506-0117 (exp. 06/30/2018)

	Planned Activities	Technical assistance for local nonprofits to increase their capacity to provide services. Agencies include; • PADS Lake County - $50,000 CDBG, • The Harbour - $25,000 CDBG, • Nicasa - $25,000 CDBG • Collaborative Community Housing Initiative - $50,000 CDBG, • Mano a Mano - $25,000 CDBG, • Childserv - $25,000 and • Adelante Center - $25,000 CDBG.
6	**Project Name**	Permanent Supportive Housing
	Target Area	Mundelein Area Round Lakes Area Waukegan Area Zion Area Fox Lake Area North Chicago Area High Outcome Areas Highwood Area
	Goals Supported	Improve homeless crisis response system Maximize Affordable Housing
	Needs Addressed	End Homelessness in Lake County Accessible Housing
	Funding	CDBG: $150,000 HOME: $73,431
	Description	Create permanent supportive housing units.
	Target Date	4/30/2021

OMB Control No: 2506-0117 (exp. 06/30/2018)

	Estimate the number and type of families that will benefit from the proposed activities	54 households
	Location Description	2801 Sunset Ave. Waukegan, IL
	Planned Activities	Thresholds $100,000 CDBG and Independence Center $50,000 CDBG - Create permanent supportive housing in Lake County, IL by rehabilitating existing units Over the Rainbow $73,431 HOME - Create permanent supportive housing in Lake County, IL by constructing new units.
7	**Project Name**	Transitional Housing
	Target Area	Mundelein Area Round Lakes Area Waukegan Area Zion Area Fox Lake Area North Chicago Area High Outcome Areas Highwood Area
	Goals Supported	Improve homeless crisis response system Maximize Affordable Housing
	Needs Addressed	End Homelessness in Lake County Accessible Housing
	Funding	CDBG: $25,000
	Description	Create additional transitional housing beds
	Target Date	4/30/2021

OMB Control No: 2506-0117 (exp. 06/30/2018)

	Estimate the number and type of families that will benefit from the proposed activities	15 beds
	Location Description	To be determined
	Planned Activities	A Safe Place $25,000 CDBG - Create an additional transitional housing beds in Lake County
8	**Project Name**	Facility Improvements - Accessibility
	Target Area	Mundelein Area Round Lakes Area Waukegan Area Zion Area Fox Lake Area North Chicago Area High Outcome Areas Highwood Area
	Goals Supported	Assist People with Special Needs
	Needs Addressed	End Homelessness in Lake County Accessible Housing
	Funding	CDBG: $111,000
	Description	Facility improvements at an emergency shelter.
	Target Date	4/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	1015 persons assisted

OMB Control No: 2506-0117 (exp. 06/30/2018)

	Location Description	102 Highwood Ave. Highwood, IL 640 Ridge Rd. Highland Park, IL
	Planned Activities	Facility accessibility improvement for nonprofit service agencies: • Highwood Public Library $46,000 CDBG, • Highland Park Community Nursery $40,000 CDBG, and • Northern Illinois Recovery Community Organization (NIRCO) $25,000 CDBG
9	**Project Name**	Facility Improvements - Housing
	Target Area	Waukegan Area
	Goals Supported	Assist People with Special Needs
	Needs Addressed	Accessible Housing
	Funding	CDBG: $160,500
	Description	Renovations to facilities operated by nonprofit housing providers.
	Target Date	4/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	18 housing units
	Location Description	Village of Gurnee City of Waukegan
	Planned Activities	Improvements to facilities for nonprofit housing providers: • Clearbrook $134,000 CDBG, • Arden Shore $15,000, and • Wings $11,500.
	Project Name	Lake County Crisis Center

OMB Control No: 2506-0117 (exp. 06/30/2018)

10	**Target Area**	Mundelein Area Round Lakes Area Waukegan Area Zion Area Fox Lake Area North Chicago Area High Outcome Areas Highwood Area
	Goals Supported	Assist People with Special Needs
	Needs Addressed	End Homelessness in Lake County
	Funding	CDBG: $156,638
	Description	Public facility serving low/mod income residents
	Target Date	4/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	100 persons assisted
	Location Description	To be determined
	Planned Activities	Lake County Administration Office $156,638 CDBG - Development of a crisis police drop off center where police drop-off center to reduce incidents of persons in behavioral health crisis from needlessly ending up in an emergency room or jail.
11	**Project Name**	North Chicago - Infrastructure Improvements
	Target Area	North Chicago Area
	Goals Supported	Assist People with Special Needs
	Needs Addressed	Inclusive Growth

OMB Control No: 2506-0117 (exp. 06/30/2018)

	Funding	CDBG: $168,637
	Description	Infrastructure improvements in the City of North Chicago
	Target Date	4/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	900 persons assisted
	Location Description	City of North Chicago
	Planned Activities	City of North Chicago $168,637 CDBG - Upgrades to the public infrastructure system serving the LMI areas of the City of North Chicago.
12	**Project Name**	Public Services
	Target Area	Waukegan Area Zion Area North Chicago Area
	Goals Supported	Assist People with Special Needs
	Needs Addressed	Inclusive Growth
	Funding	CDBG: $198,800
	Description	Support for public service agencies serving Lake County residents.
	Target Date	4/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	4777 persons assisted
	Location Description	Throughout Lake County

OMB Control No: 2506-0117 (exp. 06/30/2018)

	Planned Activities	Support nonprofit public services agencies. • Northern Illinois Food Bank - $5,000 CDBG • PADS Lake County - $16,000 CDBG • CASA Lake County - $6,000 CDBG • Zacharias Center - $5,000 CDBG • A Safe Place - $10,000 CDBG • Antioch Area Healthcare Alliance - $15,809 CDBG • Arden Shore - $30,449 CDBG • Center for Enriched Living - $6,542 CDBG • Eldercare - $25,000 CDBG • Great Lakes Adaptive Sports Association - $12,500 CDBG • Mano a Mano - $30,000 CDBG • Youthbuild Lake County - $36,500 CDBG
13	**Project Name**	Acquisition of Affordable Rental Housing
	Target Area	High Outcome Areas
	Goals Supported	Maximize Affordable Housing
	Needs Addressed	Accessible Housing
	Funding	CDBG: $326,727 Local: $81,000
	Description	Acquisition of an affordable rental unit.
	Target Date	4/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	3 housing units
	Location Description	High Outcome Areas

OMB Control No: 2506-0117 (exp. 06/30/2018)

	Planned Activities	Community Partners for Affordable Housing (CPAH) $267,977 CDBG, $81,000 AHP and Urban Muslim Minority Alliance (UMMA) $58,750 CDBG- Acquisition of affordable rental housing units
14	**Project Name**	Down Payment Assistance Program
	Target Area	Mundelein Area Round Lakes Area Waukegan Area Zion Area Fox Lake Area North Chicago Area Highwood Area
	Goals Supported	Maximize Affordable Housing
	Needs Addressed	Accessible Housing
	Funding	HOME: $188,732 Local: $40,000
	Description	Direct financial assistance
	Target Date	4/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	26 households
	Location Description	Throughout Lake County
	Planned Activities	CPAH $188,732 CDBG and $40,000 AHP - Forgivable loans to first time home buyers
15	**Project Name**	Lake Forest Senior Cottages
	Target Area	High Outcome Areas
	Goals Supported	Maximize Affordable Housing

OMB Control No: 2506-0117 (exp. 06/30/2018)

	Needs Addressed	Accessible Housing
	Funding	HOME: $775,000
	Description	New construction of homes for seniors.
	Target Date	4/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	12 households
	Location Description	Lake Forest, IL
	Planned Activities	CPAH $775,000 HOME - Construction of six buildings consisting of two 2-bedroom units. In total, twelve units would benefit seniors at fifty percent and sixty percent of the Area Median Income (AMI).
16	**Project Name**	Owner Occupied Rehabilitation Program
	Target Area	Mundelein Area Round Lakes Area Waukegan Area Zion Area Fox Lake Area North Chicago Area Highwood Area
	Goals Supported	Maximize Affordable Housing
	Needs Addressed	Accessible Housing
	Funding	CDBG: $18,876 HOME: $175,383
	Description	Rehabilitation of owner-occupied units for low/mod income homeowners.
	Target Date	4/30/2021

OMB Control No: 2506-0117 (exp. 06/30/2018)

	Estimate the number and type of families that will benefit from the proposed activities	7 housing units
	Location Description	Throughout Lake County
	Planned Activities	CPAH $18,876 CDBG and $175,383 HOME - Rehabilitation of owner-occupied units for low/mod income homeowners.
17	**Project Name**	Affordable Senior Housing – Mundelein
	Target Area	Mundelein Area
	Goals Supported	Maximize Affordable Housing
	Needs Addressed	Accessible Housing
	Funding	HOME: $200,273
	Description	New construction of rental units for seniors.
	Target Date	4/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	45 housing units
	Location Description	513 E. Hawley St., Mundelein, IL
	Planned Activities	The Debruler Co. $200,273 HOME - Construction of 45 units of senior housing at the southwest corner of Hawley and Prospect Avenue Mundelein, IL.
	Project Name	Fair Housing

OMB Control No: 2506-0117 (exp. 06/30/2018)

18	**Target Area**	Mundelein Area Round Lakes Area Waukegan Area Zion Area Fox Lake Area North Chicago Area Highwood Area
	Goals Supported	Maximize Affordable Housing
	Needs Addressed	Accessible Housing
	Funding	CDBG: $45,700
	Description	Fair housing programming
	Target Date	4/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	51 persons assisted
	Location Description	Countywide
	Planned Activities	Prairie State Legal Services $45,700 CDBG - Operate the Fair Housing Program for Lake County by providing free legal services to the most vulnerable groups in our society, including the poor, the elderly, and all protected groups under the federal Fair Housing Act and the Illinois Human Rights Act.
19	**Project Name**	Armory Terrace Reconstruction
	Target Area	Waukegan Area
	Goals Supported	Maximize Affordable Housing
	Needs Addressed	Accessible Housing
	Funding	HOME: $292,304

OMB Control No: 2506-0117 (exp. 06/30/2018)

	Description	Reconstruction of 50 public housing units.
	Target Date	4/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	50 households
	Location Description	1701 N McAree Rd., Waukegan, IL
	Planned Activities	Waukegan Housing Authority and Bear Development, LLC $292,304 - Complete renovation of 50 rental units of existing housing located at 1701 N McAree Rd that are currently referred to as Armory Terrace. The Development will utilize HUD's Rental Assistance Demonstration (RAD) program where the current public housing units will be converted into units that will receive Project Based Rental Assistance (PBRA).
20	**Project Name**	City of Zion - 27th Street
	Target Area	Zion Area
	Goals Supported	Maximize Affordable Housing
	Needs Addressed	Accessible Housing
	Funding	CDBG: $250,000
	Description	Creation of affordable housing at 1805 27th Street.
	Target Date	4/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	24 housing units
	Location Description	1805 27th Street, Zion, IL

OMB Control No: 2506-0117 (exp. 06/30/2018)

	Planned Activities	City of Zion $250,000 - Create 24 affordable housing units at the property located at 1805 27th Street, Zion, IL.
21	**Project Name**	City of Zion - Kenosha Rd. Demolition
	Target Area	Zion Area
	Goals Supported	Maximize Affordable Housing
	Needs Addressed	Accessible Housing
	Funding	CDBG: $100,000
	Description	Demolition of two dilapidated structures in the City of Zion.
	Target Date	4/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	2 buildings demolished
	Location Description	2000 Liberty Ln, Zion, IL
	Planned Activities	City of Zion $100,000 CDBG - Demolition of two dilapidated structures located on Liberty Ln. in the City of Zion, IL.
22	**Project Name**	Small Business Loan Program
	Target Area	Waukegan Area Zion Area North Chicago Area
	Goals Supported	Create Pathways for Upward Economic Mobility
	Needs Addressed	Inclusive Growth
	Funding	CDBG: $14,400
	Description	Small business loans to eligible businesses.

OMB Control No: 2506-0117 (exp. 06/30/2018)

	Target Date	4/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	3 businesses assisted
	Location Description	Throughout Lake County
	Planned Activities	Black Chamber of Commerce of Lake County $14,400 CDBG - Provide program administration for a program that provides low interest loans to Lake County business owners providing them the resources to establish, stabilize or expand their small businesses enabling them to hire additional low/moderate income employees.
23	**Project Name**	City of Zion - Galilee Demolition
	Target Area	Zion Area
	Goals Supported	Create Pathways for Upward Economic Mobility
	Needs Addressed	Inclusive Growth
	Funding	CDBG: $150,000
	Description	Demolition of a dilapidated structure in the City of Zion, IL.
	Target Date	4/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	1 building demolished
	Location Description	2771 Galilee Ave., Zion, IL
	Planned Activities	City of Zion $150,000 CDBG - Demolition of the existing structure located at 2771 Galilee Ave.
	Project Name	Program Administration

OMB Control No: 2506-0117 (exp. 06/30/2018)

24	**Target Area**	Mundelein Area Round Lakes Area Waukegan Area Zion Area Fox Lake Area North Chicago Area High Outcome Areas Highwood Area
	Goals Supported	Program Administration
	Needs Addressed	End Homelessness in Lake County Inclusive Growth Accessible Housing Borderless Transit
	Funding	CDBG: $581,073 HOME: $167,031 Local: $30,000
	Description	Program Administration
	Target Date	4/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	N/A
	Location Description	N/A
	Planned Activities	Program administration

OMB Control No: 2506-0117 (exp. 06/30/2018)

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 County developed its geographic priorities based on a two-pronged approach:

1. Revitalize areas of greatest need. In addition to the entitlement communities of North Chicago and Waukegan, several areas of Lake County are home to a concentrated number of low/moderate income households whose neighborhoods would benefit from community development investment.

2. Assist in expanding the supply of housing in the identified high outcome areas, outside areas where there are already heavy concentrations of affordable housing.

Geographic Distribution

Target Area	Percentage of Funds
Mundelein Area	4
Round Lakes Area	
Waukegan Area	10
Zion Area	9
Fox Lake Area	
North Chicago Area	4
High Outcome Areas	24
Highwood Area	1

Table 60 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

The geographic distribution of Program Year 2020 (PY20) funds is driven by the geographic priorities discussed above. The geographic percentages are also a function of the partnership between Lake County, the City of Waukegan and the City of North Chicago. Both the City of Waukegan and the City of North Chicago receive entitlement funds and the Joint Agreement between defines an annual investment amount be allocated to each municipality.

Discussion

According to CMAP's On To 2050 Plan, "Strong, livable places offer a range of housing, transportation, employment, and amenity options to meet these changing needs. While their character varies according to local goals, vibrant destinations and communities attract activity and investment. Strategies to shape these communities build on each other and also contribute to regional resilience. For example, compact development patterns support cost-effective public transit service and also facilitate walking and biking; transit and non-motorized options, in turn, improve mobility and public health and also reduce GHG

OMB Control No: 2506-0117 (exp. 06/30/2018)

(Greenhouse Gas) emissions; these prioritized investments reduce infrastructure costs and promote fiscal sustainability. Fostering strong places throughout the region provides many opportunities for improving quality of life and economic results for the region's residents and businesses."

Affordable Housing

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

Introduction

One Year Goals for the Number of Households to be Supported	
Homeless	36
Non-Homeless	110
Special-Needs	113
Total	259

Table 61 - One Year Goals for Affordable Housing by Support Requirement

One Year Goals for the Number of Households Supported Through	
Rental Assistance	36
The Production of New Units	81
Rehab of Existing Units	115
Acquisition of Existing Units	27
Total	259

Table 62 - One Year Goals for Affordable Housing by Support Type

Discussion

For purposes of this section, homeless households are assisted through rapid rehousing and tenant based rental assistance. Non-homeless households will be supported by owner-occupied rehabilitation, down payment assistance, homelessness prevention, the construction of new rental units, and acquisition/rehab/resale. It is assumed that some acquisition and rehab projects will assist the homeless and special needs populations.

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

Introduction

Lake County has three public housing agencies: Lake County Housing Authority (LCHA), Waukegan Housing Authority (WHA), and North Chicago Housing Authority (NCHA).

Lake County Housing Authority owns and operates 495 units of public housing, including 332 units of public housing for seniors and individuals with disabilities and 161 single family homes. Additionally, LCHA administers 350 project-based vouchers and approximately 3,076 tenant-based Housing Choice Vouchers, including special purpose vouchers such as 285 Family Unification (FUP) vouchers, 50 Mainstream vouchers, and 100 Non-Elderly Disabled Vouchers (NED).

Waukegan Housing Authority maintains 448 public housing units. Additionally, WHA administers 16 project-based vouchers and administers a Housing Choice Voucher Program, including special purpose vouchers such as 33 tenant-based FUP vouchers, 79 HUD-VASH vouchers, and 28 Mainstream vouchers.

North Chicago Housing Authority manages 150 public housing units and administers 471 Housing Choice Vouchers, including 5 FUP vouchers and 70 HUD-VASH vouchers.

Lake County welcomes opportunities to collaborate, and public housing agencies are invited to apply for funding during open founding rounds, including the 5-year call for projects.

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

Waukegan Housing Authority is in the process of a Rental Assistance Demonstration (RAD) redevelopment of their Barwell property, oh which HOME funds have been committed. This redevelopment will enable the WHA to improve the quality of 220 public housing units.

Additionally, Lake County will continue partnering with all three public housing agencies where possible. Past partnerships, such as the inclusion of LCHA in the ServicePoint Referral Network, referrals to LCHA and WHA Mainstream Voucher programs, and the inclusion of a portion of Housing Choice Voucher recipients in the Landlord Risk Mitigation Fund program, will continue throughout the following year.

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

Lake County Housing Authority operates a Family Self-Sufficiency (FSS) Program, which is an employment and savings incentive program for low-income families using Section 8 Housing Choice Vouchers. For graduates of the program that wish to use their FSS savings for down payment on a home, LCHA has a housing counselor to assist the tenant's transition to homeownership. Additionally, LCHA holds free Home Buyer's Education Workshops that are welcome to any member of the public

interested in obtaining advice on the homebuying process.

If the PHA is designated as troubled, describe the manner in which financial assistance will be provided or other assistance

None of the housing authorities in Lake County are designated as troubled.

Discussion

Lake County recognizes that quality affordable housing is crucial to ensuring that all residents are able to live a safe, healthy, and productive life. For that reason, Lake County's 5-year Consolidated Plan has continued to prioritize the production and preservation of quality affordable housing. Public housing agencies provide critical housing resources to Lake County's low-income residents, and Lake County welcomes and encourages collaboration between public housing agencies and other organizations that help Lake County residents in need.

In recent years, Lake County has collaborated with the three Public Housing Agencies in Lake County to bring additional resources into the community for the provision of affordable housing as well as to increase access to existing resources. Lake County partnered with the Lake County Coalition for the Homeless (LCCH) to assist both Lake County Housing Authority (LCHA) and Waukegan Housing Authority (WHA) to apply for additional Housing Choice Vouchers from the U.S. Department of Housing and Urban Development (HUD). This partnership resulted in a successful award of additional special-purpose Housing Choice Vouchers, known as Mainstream Vouchers, to both PHAs. The partnership also expanded coordination among the agencies for the purposes of administering the vouchers. The full award of Mainstream Vouchers given to LCHA and a portion of the award given to WHA preference homeless clients of the LCCH.

These units, along with other units made available to LCCH clients experiencing homelessness, are eligible for the Landlord Risk Mitigation Fund, a program developed through a partnership with the Lake County Coalition for the Homeless (LCCH). The fund provides a financial incentive for landlords in the private market to rent units to LCCH clients, including those given a housing choice voucher. Additionally, LCHA has become a member of the ServicePoint Referral Network, a network of public, governmental, and nonprofit Lake County service providers that are able to send and receive electronic referrals for the purposes of enhanced coordination among providers. These partnerships will continue throughout the Action Plan year.

Additionally, public housing agencies are always welcome to apply for Lake County HUD funding for eligible projects to increase the availability of affordable housing.

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

Introduction

Lake County coordinates with the Lake County Coalition for the Homeless to ensure that the homeless crisis response system meets the needs of Lake County residents experiencing homelessness or at-risk of homelessness. The system responds to the needs of persons experiencing homelessness through engagement and connection to services and housing. The Lake County Coalition for the Homeless oversees the Coordinated Entry system to ensure that all agencies who may serve as the first point of engagement with persons experiencing homelessness can quickly connect the household to the resources they need. Emergency shelters, street outreach, mainstream system, and other providers may serve as points of entry into the system. Once identified at a point of entry, households are referred to the housing and other resources most appropriate to them. Those experiencing literal homelessness are referred to the Coordinated Entry By-Name List, where they are assessed and prioritized for housing such as permanent supportive housing, rapid rehousing, or other subsidized housing resources. Those at risk of homelessness are referred to Homelessness Prevention programs. Many of these resources are prioritized for subpopulations including those experiencing chronic homelessness and veteran households.

Over the next year, Lake County will support several agencies that provide point of entry services and housing services to households experiencing homelessness or a-risk of homelessness.

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

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

The individual needs of homeless persons are addressed by case managers at homeless service agencies, including shelters. For persons experiencing homelessness that are unsheltered, staff of outreach programs meet the client where they in the community to assess their individual needs and connect them to services in the community. Currently, PADS Lake County is the only provider of homeless outreach services, which produces excellent results with limited staff capacity. Over the next year, Lake County will increase the capacity of the outreach program at PADS in order to better serve those experiencing unsheltered homelessness.

Addressing the emergency shelter and transitional housing needs of homeless persons

Lake County can support emergency shelter and transitional housing programs by funding improvements to the public buildings as well as by supporting the public services these

agencies provide. Over the next year, Lake County will fund both infrastructure improvements and services for PADS and A Safe Place, agencies which provide emergency shelter and services to persons experiencing homelessness. Additionally, funding will support two new transitional housing programs being developed by A Safe Place and ChildServ.

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

As discussed above, the homeless crisis response system quickly connects households experiencing homelessness to the resources most appropriate to them, such as permanent supportive housing, rapid rehousing, or other subsidized housing resources. Many of these resources are prioritized for subpopulations including those experiencing chronic homelessness and veteran households. System Performance Metrics are reviewed often to identify ways to shorten the period of time that individuals and families experience homelessness and assess the success of programs to prevent individuals and families who were recently homeless from becoming homeless again. All of these efforts are intended to quickly facilitate the transition to permanent housing. Additionally, Lake County continues to develop partnerships and allocate funding that will bring additional affordable housing units into the community, especially those prioritized for those experiencing homelessness.

Over the next year, Lake County will fund Catholic Charities Rapid Rehousing program, which assists households experiencing homelessness to transition to permanent housing. Lake County will support several Permanent Supportive Housing developments, including projects by Thresholds, Independence Center, and Over the Rainbow. Though these developments are not reserved for individuals and families experiencing homelessness, a subset of the units are expected to serve those with a history of homelessness, and Over the Rainbow will set aside a portion of the units for persons experiencing homelessness. Additionally, Lake County continues to administer the Landlord Risk Mitigation Fund with prior year funding, which helps expand the amount of units that are available to those being served by programs such as Rapid Rehousing.

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

OMB Control No: 2506-0117 (exp. 06/30/2018)

employment, education, or youth needs.

Lake County's homeless crisis response system has multiple partnerships and referral pathways that are intended to identify households in crisis in order to prevent homelessness. Homelessness Prevention programs serve as crucial safety nets that can help households in crisis stabilize in permanent housing. Over the next year, Lake County will support Homeless Prevention programs that address multiple barriers that can lead to homelessness. Catholic Charities provides financial rental assistance to families that are at high risk of homelessness, and both Prairie State Legal Services and North Suburban Legal Aid Clinic provide legal housing advocacy assistance to help maintain the housing of households at risk of homelessness. Lake County will support these programs. Additionally, as mentioned above, Lake County continues to develop partnerships and strengthen referral pathways between governmental and nonprofit agencies that serve low income individuals and families to ensure that those in crisis are identified and served before they experience homelessness.

Discussion

Lake County focuses on the needs of households experiencing homelessness and at risk of homelessness by playing a role at both the system level and the agency level. Activities are intended to continually improve the systems of service, and funding is allocated to meet the needs identified. Continual assessment ensures that funding is prioritized in ways that will make the greatest impact on Lake County residents.

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

Introduction

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

Restrictive land use policy in Lake County contributes to the current lack of quality, affordable housing stock. According to CMAP's 2019 Community Data Snapshot, data available from 2013 to 2017 showed significant portions of residents across all income levels pay over thirty percent of their income in housing expenses (https://www.cmap.illinois.gov/documents/10180/102881/Lake+-+ALL.pdf). Lake County will promote changes to land use controls and land tax policies through strategic implementation of financial resources and public-private partnerships.

These actions will revisit previously identified strategies with great potential for impact: encourage variety of housing types to meet resident needs; encourage zoning codes at county and municipal levels; expand relationships with housing developers to encourage affordable housing development and consider inclusionary zoning mechanisms; and assist the expanding of housing supply near employment centers.

Lake County will support a range of housing programs partners ranging from large scale housing developers to home owners. This will maximize the creation and preservation of affordable housing units appropriate for each different housing market type in Lake County. Successful large scale projects will add needed units to the affordable housing stock as well as possibly allay local fears of higher density housing. Strategic partnerships with non-profit housing developers will create opportunities to protect current affordable housing stock as well as provide an option for future affordable housing development. Lake County will also partner with private non-profits to provide homeowners with funds to renovate their homes and assist new homeowners with their down payment. Homeowner-focused programs extend the life of existing housing structures and reduce transaction costs of purchasing a home. These lower costs would reduce pressures from land tax policies and rising home prices. This could be helpful to a homeowner seeking to remain near their job site and neighborhood amenities.

Lake County will need expanded capacity from partners for future progress on housing affordability. To that end, Lake County will work to expand non-profit capacity to develop high-impact strategic initiatives. One initiative will be to develop housing models that maximize service delivery for populations with specialized needs. Another initiative will be to generate economic growth in

OMB Control No: 2506-0117 (exp. 06/30/2018)

economically disinvested areas. This would address housing affordability through increased incomes.

Discussion

Lake County will support projects that address housing needs and can serve as a vehicle to engage the public and elected officials on the opportunity to update land use laws. As a non-home rule jurisdiction, Lake County can encourage policy change by example. It has done so by amending its zoning code to include accessory dwelling units and by recently choosing to not increase its property tax levy, thereby not increasing financial burden to taxpayers. These combined efforts with housing developers and non-profit agencies will allow Lake County to reduce barriers to affordable housing over the next year and near future.

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

Introduction

Actions planned to address obstacles to meeting underserved needs

Actions planned to foster and maintain affordable housing

Actions planned to reduce lead-based paint hazards

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

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

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

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

Actions planned to reduce the number of poverty-level families

Actions planned to develop institutional structure

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

service agencies

Discussion

Program Specific Requirements

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

Introduction

Community Development Block Grant Program (CDBG)
Reference 24 CFR 91.220(l)(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	$29,656
2. The amount of proceeds from section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives identified in the grantee's strategic plan	$0
3. The amount of surplus funds from urban renewal settlements	$0
4. The amount of any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan.	$0
5. The amount of income from float-funded activities	$0
Total Program Income	$29,656

Other CDBG Requirements

1. The amount of urgent need activities
There are no urgent need activities in the Action Plan.

HOME Investment Partnership Program (HOME)
Reference 24 CFR 91.220(l)(2)

1. A description of other forms of investment being used beyond those identified in Section 92.205 is as follows:
In addition to investing HOME Investment Partnership Program (HOME) funds in eligible activities as described in 24 CFR 92.205, Lake County invests other funding sources into housing activities. CDBG funds are often utilized for CDBG-eligible housing activities. Additionally, local Affordable Housing Program (AHP) funds are invested in housing activities to complement those funded by HOME and CDBG.

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

   Lake County's Recapture and Resale Provisions document describe the conditions under which a homebuyer activity will be subject to either resale or recapture. Recapture provisions shall be enforced in cases where HOME funds are provided as a direct subsidy to the homebuyer as down payment and/or purchase- price assistance. Resale provisions shall be required when the HOME

OMB Control No: 2506-0117 (exp. 06/30/2018)

subsidy is provided in the form of a development subsidy in which HOME funds are divided among each HOME-assisted unit and not provided as a direct subsidy to the homebuyer. Resale provisions shall be encouraged when the HOME subsidy is provided in the form of a direct subsidy to the homebuyer and a Community Land Trust or other similar entity maintains ownership of the land associated with the HOME-assisted property to ensure its continued affordability, or it is determined that the property is located in a highly appreciating market for the purpose of maintaining the unit's affordability throughout the entire period of affordability.

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

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

4. Plans for using HOME funds to refinance existing debt secured by multifamily housing that is rehabilitated with HOME funds along with a description of the refinancing guidelines required that will be used under 24 CFR 92.206(b), are as follows:

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

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

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

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

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

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

3. Identify the process for making sub-awards and describe how the ESG allocation available to

OMB Control No: 2506-0117 (exp. 06/30/2018)

private nonprofit organizations (including community and faith-based organizations).

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

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

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

5. Describe performance standards for evaluating ESG.

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

Appendix - Alternate/Local Data Sources

1	**Data Source Name** 2007-2011 American Community Survey
	List the name of the organization or individual who originated the data set. US Census Bureau
	Provide a brief summary of the data set. Household demographic survey sent to approximately 250,000 American households monthly.
	What was the purpose for developing this data set? Demographic research.
	Provide the year (and optionally month, or month and day) for when the data was collected. 2007-2011
	Briefly describe the methodology for the data collection. Household demographic survey sent to approximately 250,000 American households monthly.
	Describe the total population from which the sample was taken. United States
	Describe the demographics of the respondents or characteristics of the unit of measure, and the number of respondents or units surveyed. Household demographic survey sent to approximately 250,000 American households monthly.
2	**Data Source Name** LCHA Inventory
	List the name of the organization or individual who originated the data set. Lake County Housing Authority
	Provide a brief summary of the data set. Inventory data on public housing units and vouchers managed by housing authority.
	What was the purpose for developing this data set? Inventory management.
	How comprehensive is the coverage of this administrative data? Is data collection concentrated in one geographic area or among a certain population? Covers LCHA only.

	What time period (provide the year, and optionally month, or month and day) is covered by this data set? Ongoing; latest version: 8/2014.
	What is the status of the data set (complete, in progress, or planned)? Complete.
3	**Data Source Name** HMIS Inventory
	List the name of the organization or individual who originated the data set. Lake County Community Development, HMIS Inventory
	Provide a brief summary of the data set. Homeless Management Inventory System data - provides data on homeless persons and homeless facilities in a given locality.
	What was the purpose for developing this data set? Providing insight into homelessness
	How comprehensive is the coverage of this administrative data? Is data collection concentrated in one geographic area or among a certain population? Lake County
	What time period (provide the year, and optionally month, or month and day) is covered by this data set? Ongoing; data in plan current as of 8/2014
	What is the status of the data set (complete, in progress, or planned)? Complete
4	**Data Source Name** 2000 Census
	List the name of the organization or individual who originated the data set. United States Census Bureau
	Provide a brief summary of the data set. The Census collects data on the characteristics of individuals, households, and housing units throughout the country.
	What was the purpose for developing this data set?

OMB Control No: 2506-0117 (exp. 06/30/2018)

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

OMB Control No: 2506-0117 (exp. 06/30/2018)

	List the name of the organization or individual who originated the data set. The United States Census Bureau
	Provide a brief summary of the data set. The data set counts the number of people living in the United States.
	What was the purpose for developing this data set? According to the Census Bureau, the purpose is to count every person living in the United States of America, and to use that count to determine representation in the Congress.
	Provide the year (and optionally month, or month and day) for when the data was collected. April 1, 2000
	Briefly describe the methodology for the data collection. To count population, the Census Bureau uses a cohort component method to produce estimates. This is derived from a demographic balancing equation.
	Describe the total population from which the sample was taken. The total population includes all of the 50 states in the United States, the District of Columbia, and the U.S. territory of Puerto Rico.
	Describe the demographics of the respondents or characteristics of the unit of measure, and the number of respondents or units surveyed. The national response rate was 67%. The demographics are as follows: 49.1% Male and 50.9% Female. 75.1% White, 12.3% Black or African American, .9% American Indian and Alaska Native, 3.6% Asian, .1% Native Hawaiian and Other Pacific Islander, 5.5% Some other race, 2.4% Two or more races.
7	**Data Source Name** EMSI Labor Market Analytics
	List the name of the organization or individual who originated the data set. Lake County Partners
	Provide a brief summary of the data set. EMSI contains data from government sources like US Census Bureau and the Department of Labor plus data from job advertisements made by employers (aka real-time labor market data).
	What was the purpose for developing this data set? Third party provider, Emsi, sells this data tool to clients like Lake County Partners.
	How comprehensive is the coverage of this administrative data? Is data collection concentrated in one geographic area or among a certain population? Comprehensive

OMB Control No: 2506-0117 (exp. 06/30/2018)

	What time period (provide the year, and optionally month, or month and day) is covered by this data set? 2019-20
	What is the status of the data set (complete, in progress, or planned)? Complete
8	**Data Source Name** ATTOM Data
	List the name of the organization or individual who originated the data set. ATTOM Data Solutions
	Provide a brief summary of the data set. Assessor, Recorder, Foreclosure, Geocodes, Property Characteristics, Valuations, Ownership, Mortgage Loan, and Sales History data compiled in one data warehouse.
	What was the purpose for developing this data set? From the ATTOM Website: ATTOM provides premium real estate data to power products that improve transparency, innovation, efficiency and disruption in a data-driven economy.
	How comprehensive is the coverage of this administrative data? Is data collection concentrated in one geographic area or among a certain population? The ATTOM website indicates the data covers 99% of the U.S. population.
	What time period (provide the year, and optionally month, or month and day) is covered by this data set? N/A
	What is the status of the data set (complete, in progress, or planned)? In progress

Community Development

LakeCounty

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

Last Revised May 2020

Eligibility Evaluation Policy

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

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

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

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

- Written observation by the outreach worker; <u>or</u>
- Written referral by another housing or service provider (including HMIS recorded referral); <u>or</u>
- Certification by the individual or head of household seeking assistance stating that (s)he was living on the streets or in a shelter.

- For individuals exiting an institution – one of the above forms of evidence <u>and:</u>
    - Discharge paperwork <u>or</u> written/oral referral, <u>or</u>
    - Written record of intake worker's due diligence to obtain above evidence <u>and</u> certification by individual that they exited institution

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

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

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

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

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

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

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

"At Risk of Homelessness"

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

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

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

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

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

Homeless Services Coordination Policy

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

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

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

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

Prioritization Policies

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

Homelessness Prevention

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

The "but for" rule can be documented with the following:

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

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

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

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

Rapid Re-Housing

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

Rent & Utility Cost Sharing Policy

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

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

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

Length of Participation Policy – Financial Assistance

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

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

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

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

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

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

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

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

Performance Measures

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

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

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

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

The required ESG performance measures are as follows:

For all programs:

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

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

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

Lake County HOME Consortium: Recapture and Resale Provisions

Resale and Recapture Policies

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

Period of Affordability

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

HOME amount per unit	Minimum Period of Affordability
Under $15,000	5 years
$15,000 to $40,000	10 years
Over $40,000	15 years

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

Resale Provisions

- Activity Types - Resale provisions as outlined in 24 CFR Part 92.254(a)(5)(i)(A) and (B) shall be required or encouraged in the following cases:
  - Resale provisions shall be required when the HOME subsidy is provided in the form of a development subsidy in which HOME funds are divided among each HOME-assisted unit and not provided as a direct subsidy to the homebuyer.
  - Resale provisions shall be encouraged when the HOME subsidy is provided in the form of a direct subsidy to the homebuyer and a Community Land Trust or other similar entity maintains ownership of the land associated with the HOME-assisted property to ensure its continued affordability in perpetuity.
  - Resale provisions shall be encouraged when the HOME subsidy is provided in the form of a direct subsidy to the homebuyer and it is determined that the property is located in a highly appreciating market for the purpose of maintaining the unit's affordability throughout the entire period of affordability.

- Methods – The resale option ensures that the HOME-assisted unit remains affordable over the entire period of affordability. All HOME-assisted units shall meet the following criteria:
  - The new purchaser must be low-income, meeting the HOME Program definition, and within the same income limit as the original buyer. Additionally, the new purchaser must occupy the property as their principle residence.
  - To ensure that the sales price is affordable to a low-income homebuyer, the homebuyer may receive HOME Program direct assistance through a reduction in sales price, down payment assistance, or closing cost assistance. The additional HOME Program assistance may result in a longer Period of Affordability for the unit.
  - The sales price must be "affordable" to the new purchaser. In this instance, affordability for the new purchaser is a sales price that would require the new purchaser to pay no more 30% of their monthly

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

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

	Down Payment
	Loan Principal Paid
	Current Loan Amount
	Capital Improvement Value
+	House Value Change, per HPI
	Maximum Sales Price

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

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

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

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

House Value Change: The dollar value in the increase or decrease of the house as produced from the "Housing Price Index Calculator" at www.FHFA.gov.

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

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

	Down Payment
	Capital Improvement Value
	Loan Principal Paid
+	House Value Change, per HPI
	Fair Return to Seller

Down Payment: as defined above.

Capital Improvement: as defined above.

Loan Principal Paid: as defined above.

House Value Change: as defined above.

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

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

	Original Purchase Price
	Homeowner share of appreciation
+	Capital Improvement Value
	Fair Return to Seller

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

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

Capital Improvement Value: as defined above.

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

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

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

Recapture Provisions

A. Activity Types - Recapture provisions as outlined in 24 CFR Part 92.254(a)(5)(ii)(A)(1) through (7) shall be enforced in cases where HOME funds are provided as a direct subsidy to the homebuyer as down payment and/or purchase- price assistance.

B. Methods – The recapture option allows Lake County to recapture the entire HOME subsidy, subject to net proceeds if any, if the HOME recipient decides to sell the unit within the period of affordability at whatever price the market will bear. All HOME-assisted unit sales under the recapture option shall meet the following criteria:
   - The homebuyer may sell the property to any willing buyer.

- The sale of the property during the period of affordability triggers repayment of the direct HOME subsidy, subject to net proceeds if any, to Lake County that the buyer received when he/she originally purchased the home.

C. Enforcement Mechanisms - Recapture provisions shall be enforced through a mortgage, note and Recapture Agreement filed with the Lake County Recorder of Deeds, and the requirements within shall be triggered upon sale or transfer of the HOME-assisted property.

D. Amount of Repayment – Lake County requires that when the recapture requirement is triggered by a sale (whether voluntary or involuntary), it will recapture the HOME investment up to the total net proceeds remaining, if any, after the sale as modified by program specific choices under 24 CFR Part 92.254(a)(5)(ii)(A)(1) through (4). Net proceeds are the sales price minus the superior loan repayment (other than HOME funds) and any closing costs. In cases where the superior loan repayment and closing costs meet or exceed the sales price, net proceeds are zero. The specific method of recapture as capped by net proceeds, if any, is the following:

   a. Reduction during the affordability period - Reduce the HOME investment amount to be recaptured on a pro rata basis for the time the homeowner has owned and occupied the housing measured against the required affordability period.

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

E. Mortgage Release - Upon receipt of recaptured funds, Lake County shall file a "Release" document with the Lake County Recorder of Deeds to release the original HOME-assisted homebuyer from the requirements of the mortgage or other similar mechanism.

F. Repayments – Repayments of recaptured funds shall be remitted directly to Lake County to be utilized for HOME-eligible activities only.

Compliance

A. If the homebuyer is in noncompliance with the HOME Program requirements, the homebuyer shall repay the entire direct HOME Program subsidy to the Lake County Consortium within 90 days of notification of noncompliance. In the event of repayment due to noncompliance, the repayment amount is not subject to pro rata reduction over the period of affordability.

B. Noncompliance with the HOME Program requirements includes: (1) failure to occupy the unit as the homebuyer's principal place of residence, either by vacating or leasing the unit, throughout the entire Period of Affordability; (2) purposefully providing false information as to the homebuyer's income or status as low-income; (3) failure to maintain the unit in accordance with all State and local housing quality standards or codes; (4) failure to comply with Lake County Consortium monitoring to determine compliance with the principal residency or property standards requirements; or (5) the sale or transfer of the unit without adherence to the resale/recapture provisions established in the mortgage, note, and homebuyer agreement.

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

Background

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

Determined Limit

The HOME Homeownership Value Limit for 2020 is $275,500.

Income Determination and Market Study Methodology

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

- As there were over 500 sales per month, the market study covers a 1-month reporting period, listed in ascending order of sales price.
- The street address of each property is included in the data.
- The attached market analysis includes all housing sales reported in the MLS database in Lake County in March 2020, ensuring that the sales data reflects all or nearly all of the one-family house sales in the entire participating jurisdiction.
- The total number of sales is even, so the median sales price has been determined by taking the higher number of the middle sales on the list. The 95% value limit has been determined by multiplying that median sales price by 0.95.

MLS #	Stat	Street #	Str Name	City	County	Closed Date	Sold Pr
10495400	CLSD	3213	Gideon	Zion	Lake	3/13/2020	$35,000.00
10562337	CLSD	2115	Ezra	Zion	Lake	3/13/2020	$38,750.00
10636653	CLSD	401	Greenwood	Round Lake Park	Lake	3/12/2020	$39,000.00
10620148	CLSD	2403	Lydia	Zion	Lake	3/13/2020	$40,000.00
10624963	CLSD	2907	Enoch	Zion	Lake	3/25/2020	$45,000.00
10458709	CLSD	2741	Ezra	Zion	Lake	3/30/2020	$53,000.00
10554621	CLSD	38055	Watts	Spring Grove	Lake	3/20/2020	$56,000.00
10634513	CLSD	10029	17th	Zion	Lake	3/2/2020	$57,000.00
10567276	CLSD	1324	Round Lake	Round Lake Beach	Lake	3/17/2020	$67,500.00
10634916	CLSD	814	EDWARDS	Waukegan	Lake	3/18/2020	$69,000.00
10646099	CLSD	12735	Glen Flora	Waukegan	Lake	3/31/2020	$70,000.00
10633713	CLSD	2816	Gateway	Grayslake	Lake	3/6/2020	$72,500.00
10582021	CLSD	1630	RICE	Waukegan	Lake	3/16/2020	$72,625.00
10639394	CLSD	1304	Landon	Winthrop Harbor	Lake	3/19/2020	$74,000.00
10443053	CLSD	1012	CASTLETON	Grayslake	Lake	3/11/2020	$80,000.00
10514715	CLSD	1605	Lyons	Waukegan	Lake	3/11/2020	$80,000.00
10617062	CLSD	3236	Gilboa	Zion	Lake	3/31/2020	$80,000.00
10659576	CLSD	2908	Yeoman	Waukegan	Lake	3/31/2020	$82,500.00
10573930	CLSD	1304	Ridgeland	Waukegan	Lake	3/3/2020	$84,900.00
10638130	CLSD	1619	McGovern	Highland Park	Lake	3/25/2020	$85,000.00
10601956	CLSD	33697	Oakland	Grayslake	Lake	3/27/2020	$85,000.00
10535890	CLSD	39210	Jackson	Spring Grove	Lake	3/30/2020	$85,000.00
10630508	CLSD	13	Hawthorne	Round Lake Beach	Lake	3/13/2020	$86,000.00
10587084	CLSD	3023	Enoch	Zion	Lake	3/6/2020	$87,000.00
10601642	CLSD	3710	Brookside	Grayslake	Lake	3/30/2020	$88,500.00
10647639	CLSD	1117	Grand	Waukegan	Lake	3/20/2020	$89,500.00
10630068	CLSD	615	Hillside	Round Lake Beach	Lake	3/19/2020	$90,000.00
10656028	CLSD	26127	Channel	Antioch	Lake	3/27/2020	$92,000.00
10545468	CLSD	2924	Ezra	Zion	Lake	3/6/2020	$94,900.00
10603548	CLSD	246	Misty Ridge	Lakemoor	Lake	3/31/2020	$95,000.00
10603855	CLSD	2116	Joanna	Zion	Lake	3/24/2020	$96,800.00
10584267	CLSD	20736	Genoa	Lake Villa	Lake	3/13/2020	$97,500.00
10510806	CLSD	1307	Ascot	Grayslake	Lake	3/30/2020	$99,900.00
10627974	CLSD	810	Trotter	Grayslake	Lake	3/11/2020	$100,000.00
10592244	CLSD	416	Poplar	Waukegan	Lake	3/18/2020	$100,000.00
10386117	CLSD	321	Oak	Waukegan	Lake	3/6/2020	$106,500.00
10634077	CLSD	10757	EDGEWOOD	Beach Park	Lake	3/18/2020	$109,000.00
10591497	CLSD	2620	Salem	Zion	Lake	3/18/2020	$109,000.00
10627738	CLSD	21894	4th	Lake Villa	Lake	3/13/2020	$110,000.00
10630848	CLSD	38376	11th	Spring Grove	Lake	3/19/2020	$111,189.00
10483258	CLSD	3102	Bethel	Zion	Lake	3/31/2020	$113,500.00
10587703	CLSD	1907	Gilboa	Zion	Lake	3/19/2020	$114,500.00
10645031	CLSD	2371	Grass Lake	Lindenhurst	Lake	3/18/2020	$115,000.00
10439260	CLSD	1315	Poplar	Round Lake Beach	Lake	3/2/2020	$117,000.00
10582179	CLSD	53	Marvin	Fox Lake	Lake	3/6/2020	$117,194.00
10580910	CLSD	1325	Linden	Waukegan	Lake	3/26/2020	$117,500.00
10574106	CLSD	2302	Gilead	Zion	Lake	3/13/2020	$119,900.00
10497923	CLSD	108	Fern	Island Lake	Lake	3/12/2020	$120,000.00
10518434	CLSD	3009	Hunt Club	Grayslake	Lake	3/13/2020	$120,000.00

10500718 CLSD	1516	Hyde Park	Waukegan	Lake	3/6/2020	$121,000.00
10516615 CLSD	208	Valley	Lindenhurst	Lake	3/30/2020	$123,600.00
10617234 CLSD	2531	Sequoit	Waukegan	Lake	3/23/2020	$123,651.00
10534440 CLSD	2116	Grove	North Chicago	Lake	3/6/2020	$126,000.00
10587664 CLSD	27698	Grass Lake	Spring Grove	Lake	3/27/2020	$126,000.00
10559236 CLSD	115	Jefferson	Ingleside	Lake	3/20/2020	$127,000.00
10622396 CLSD	725	George	Waukegan	Lake	3/16/2020	$128,000.00
10595585 CLSD	210	Fairlawn	Round Lake Park	Lake	3/30/2020	$128,000.00
10562070 CLSD	1328	Lorraine	Waukegan	Lake	3/6/2020	$129,000.00
10506114 CLSD	12090	York House	Beach Park	Lake	3/8/2020	$129,000.00
10623415 CLSD	24619	Passavant	Round Lake	Lake	3/18/2020	$129,900.00
10647314 CLSD	2307	Horeb	Zion	Lake	3/31/2020	$130,999.00
10601103 CLSD	93	Hilldale	Fox Lake	Lake	3/19/2020	$133,000.00
10582900 CLSD	1327	Hickory	Waukegan	Lake	3/30/2020	$133,000.00
10567402 CLSD	1102	Argonne	North Chicago	Lake	3/25/2020	$135,000.00
10638778 CLSD	2612	Menominee	Waukegan	Lake	3/31/2020	$135,000.00
10632641 CLSD	26163	INGLESIDE	Ingleside	Lake	3/25/2020	$137,000.00
10587072 CLSD	239	Barron	Grayslake	Lake	3/26/2020	$138,500.00
10627603 CLSD	520	College	Winthrop Harbor	Lake	3/25/2020	$139,000.00
10622656 CLSD	1310	Barnhart	Zion	Lake	3/13/2020	$139,900.00
10598300 CLSD	3117	Gilead	Zion	Lake	3/20/2020	$139,975.00
10607620 CLSD	342	Washington	Highwood	Lake	3/6/2020	$140,000.00
10621607 CLSD	26547	Edward	Ingleside	Lake	3/20/2020	$140,000.00
10634275 CLSD	2111	Horeb	Zion	Lake	3/12/2020	$142,000.00
10605905 CLSD	119	Shore	Island Lake	Lake	3/30/2020	$142,900.00
10617824 CLSD	107	Glenwood	Round Lake Beach	Lake	3/12/2020	$143,000.00
10620693 CLSD	2724	Pawnee	Waukegan	Lake	3/13/2020	$143,900.00
10593345 CLSD	40564	Green Bay	Beach Park	Lake	3/3/2020	$144,001.00
10472117 CLSD	235	Oakwood	Antioch	Lake	3/24/2020	$144,800.00
10594806 CLSD	38215	Harper	Beach Park	Lake	3/3/2020	$144,900.00
10590684 CLSD	416	Channel	Island Lake	Lake	3/5/2020	$145,000.00
10494250 CLSD	27849	Lake Shore	Spring Grove	Lake	3/12/2020	$145,000.00
10367301 CLSD	39810	Torry	Beach Park	Lake	3/18/2020	$145,000.00
10574213 CLSD	2700	Elizabeth	Zion	Lake	3/30/2020	$145,000.00
10597156 CLSD	705	Longfellow	Mundelein	Lake	3/16/2020	$146,000.00
10479713 CLSD	902	Fortress	McHenry	Lake	3/27/2020	$146,500.00
10624846 CLSD	630	Grove	Waukegan	Lake	3/16/2020	$147,000.00
10592509 CLSD	2711	21st	Zion	Lake	3/30/2020	$148,000.00
10615108 CLSD	48	Hillcrest	Fox Lake	Lake	3/4/2020	$149,000.00
10622328 CLSD	2005	Herbert	Waukegan	Lake	3/23/2020	$149,900.00
10646042 CLSD	1102	New York	Waukegan	Lake	3/30/2020	$149,900.00
10587096 CLSD	639	Cumnor	Barrington	Lake	3/9/2020	$150,000.00
10625358 CLSD	38744	North	Beach Park	Lake	3/25/2020	$151,400.00
10602737 CLSD	42726	Lake	Antioch	Lake	3/25/2020	$152,400.00
10562391 CLSD	1415	Hickory	Waukegan	Lake	3/3/2020	$155,000.00
10628412 CLSD	9	Linden	Mundelein	Lake	3/6/2020	$155,000.00
10626201 CLSD	21960	Sarah	Lake Villa	Lake	3/26/2020	$155,000.00
10639361 CLSD	650	Washington Park	Waukegan	Lake	3/31/2020	$155,000.00
10596483 CLSD	2116	Ezekiel	Zion	Lake	3/9/2020	$157,500.00
10601653 CLSD	34825	IL Route 83	Grayslake	Lake	3/12/2020	$158,000.00

10632470	CLSD	812	Glenwood	Waukegan	Lake	3/16/2020	$159,000.00
10603523	CLSD	2330	Glen Flora	Waukegan	Lake	3/20/2020	$159,500.00
10636593	CLSD	309	Lakewood	Antioch	Lake	3/31/2020	$159,900.00
10595949	CLSD	21755	Ravine	Lake Zurich	Lake	3/2/2020	$160,000.00
10612093	CLSD	1501	North	Waukegan	Lake	3/3/2020	$160,000.00
10647733	CLSD	33578	Idlewild	Grayslake	Lake	3/31/2020	$160,000.00
10578226	CLSD	40898	Nevelier	Antioch	Lake	3/30/2020	$160,500.00
10611735	CLSD	818	James	Waukegan	Lake	3/20/2020	$162,000.00
10590713	CLSD	3004	11th	Winthrop Harbor	Lake	3/25/2020	$163,500.00
10520730	CLSD	36526	Edgewood	Gurnee	Lake	3/23/2020	$164,000.00
10604355	CLSD	2314	Jackson	Waukegan	Lake	3/2/2020	$164,300.00
10559327	CLSD	34647	Iroquois	McHenry	Lake	3/6/2020	$165,000.00
10553305	CLSD	2113	Meadow	Lindenhurst	Lake	3/24/2020	$165,000.00
10614634	CLSD	106	Sprucewood	Round Lake Beach	Lake	3/30/2020	$165,000.00
10608974	CLSD	32	Fulton	Waukegan	Lake	3/31/2020	$166,000.00
10623064	CLSD	155	Hobble Bush	Lake Zurich	Lake	3/24/2020	$167,000.00
10622720	CLSD	103	Willow	Round Lake Park	Lake	3/26/2020	$167,000.00
10483527	CLSD	25610	High	Wauconda	Lake	3/25/2020	$167,500.00
10510904	CLSD	1958	Old Elm	Lindenhurst	Lake	3/26/2020	$167,500.00
10588967	CLSD	39766	Circle	Antioch	Lake	3/13/2020	$168,000.00
10616066	CLSD	1428	Kristan	North Chicago	Lake	3/13/2020	$168,000.00
10579811	CLSD	338	JUDGE	Waukegan	Lake	3/12/2020	$168,500.00
10573251	CLSD	1051	Midlothian	Mundelein	Lake	3/30/2020	$168,500.00
10619441	CLSD	3108	Kensington	Zion	Lake	3/12/2020	$168,748.00
10625355	CLSD	125	Central	Highwood	Lake	3/31/2020	$170,000.00
10619134	CLSD	2001	Sunset	Zion	Lake	3/4/2020	$170,500.00
10528816	CLSD	27	Sheehan	Lake Villa	Lake	3/6/2020	$173,000.00
10636994	CLSD	37237	Capillo	Lake Villa	Lake	3/31/2020	$173,000.00
10627958	CLSD	269	Rouse	Mundelein	Lake	3/17/2020	$173,317.00
10610234	CLSD	611	Parkway	Antioch	Lake	3/6/2020	$174,000.00
10604399	CLSD	1749	Baldwin	Waukegan	Lake	3/9/2020	$174,900.00
10585101	CLSD	35157	Lake Matthews	Ingleside	Lake	3/23/2020	$176,000.00
10608052	CLSD	39450	North	Beach Park	Lake	3/24/2020	$176,000.00
10579135	CLSD	141	School	Grayslake	Lake	3/23/2020	$176,300.00
10586345	CLSD	1042	Mary	Winthrop Harbor	Lake	3/27/2020	$176,600.00
10606916	CLSD	874	Fox Chase	Round Lake Beach	Lake	3/30/2020	$177,000.00
10580582	CLSD	35718	GREENLEAF	Ingleside	Lake	3/9/2020	$177,600.00
10655252	CLSD	177	Willow	Ingleside	Lake	3/30/2020	$179,000.00
10644484	CLSD	1452	Regency	Lake Villa	Lake	3/31/2020	$179,000.00
10519857	CLSD	34737	Holman	Ingleside	Lake	3/31/2020	$179,500.00
10545595	CLSD	33205	Sunset	Wildwood	Lake	3/20/2020	$180,000.00
10626156	CLSD	645	Surf	Wauconda	Lake	3/20/2020	$180,000.00
10629941	CLSD	123	Maple	Highwood	Lake	3/27/2020	$180,000.00
10599606	CLSD	2715	Carmel	Zion	Lake	3/20/2020	$182,000.00
10650206	CLSD	1612	Channel	Round Lake Beach	Lake	3/27/2020	$183,000.00
10641990	CLSD	37369	Loretto	Lake Villa	Lake	3/30/2020	$183,000.00
10475829	CLSD	1172	Taylor	Highland Park	Lake	3/10/2020	$184,000.00
10588647	CLSD	29202	Grass Lake	Spring Grove	Lake	3/30/2020	$184,000.00
10611952	CLSD	2418	Alta Vista	Waukegan	Lake	3/18/2020	$184,500.00
10588905	CLSD	291	Holly	Round Lake	Lake	3/3/2020	$185,000.00

10559820	CLSD	42751	Addison	Antioch	Lake	3/5/2020	$185,000.00
10617631	CLSD	20689	Park	Mundelein	Lake	3/16/2020	$185,000.00
10536231	CLSD	2114	7th	Winthrop Harbor	Lake	3/31/2020	$185,000.00
10593648	CLSD	13446	Piccaddilly	Beach Park	Lake	3/20/2020	$186,500.00
10592186	CLSD	1313	Lizabeth	Waukegan	Lake	3/25/2020	$187,000.00
10612104	CLSD	10080	Chaney	Beach Park	Lake	3/13/2020	$189,900.00
10586810	CLSD	12012	29th	Beach Park	Lake	3/6/2020	$190,000.00
10637148	CLSD	25282	Monaville	Lake Villa	Lake	3/12/2020	$190,000.00
10654472	CLSD	70	Orchard	Lindenhurst	Lake	3/30/2020	$190,000.00
10620684	CLSD	2620	Dana	Waukegan	Lake	3/6/2020	$192,000.00
10581061	CLSD	18562	Woodland	Gurnee	Lake	3/20/2020	$193,000.00
10624542	CLSD	3874	Grand	Gurnee	Lake	3/12/2020	$194,500.00
10580193	CLSD	732	Rockland	Libertyville	Lake	3/5/2020	$195,000.00
10627655	CLSD	616	Meadow	Libertyville	Lake	3/6/2020	$195,000.00
10549897	CLSD	281	Seymour	Grayslake	Lake	3/23/2020	$196,000.00
10589639	CLSD	385	Willow	Wauconda	Lake	3/9/2020	$196,500.00
10623916	CLSD	39080	McAree	Beach Park	Lake	3/19/2020	$198,000.00
10641854	CLSD	434	Orchard	Mundelein	Lake	3/30/2020	$199,000.00
10576685	CLSD	222	North	Highwood	Lake	3/4/2020	$200,000.00
10632747	CLSD	231	Burton	Grayslake	Lake	3/13/2020	$200,000.00
10354345	CLSD	32844	Atkinson	Grayslake	Lake	3/20/2020	$200,000.00
10612900	CLSD	16139	Arlington	Libertyville	Lake	3/2/2020	$202,500.00
10572796	CLSD	637	Dixon	Gurnee	Lake	3/2/2020	$205,000.00
10567768	CLSD	640	Dunham	Gurnee	Lake	3/6/2020	$205,000.00
10461090	CLSD	280	PERSIMMON	Round Lake Beach	Lake	3/17/2020	$205,000.00
10627073	CLSD	39838	Walton	Beach Park	Lake	3/31/2020	$205,000.00
10574013	CLSD	999	Richard Brown	Volo	Lake	3/3/2020	$205,900.00
10619850	CLSD	2289	Old Pond	Round Lake Beach	Lake	3/25/2020	$207,900.00
10610091	CLSD	3608	Rebecca	Zion	Lake	3/6/2020	$208,000.00
10480208	CLSD	26159	WOOSTER LAKE	Ingleside	Lake	3/18/2020	$210,000.00
10608145	CLSD	981	Martingale	Round Lake Beach	Lake	3/31/2020	$211,100.00
10631839	CLSD	125	Wildwood	Ingleside	Lake	3/18/2020	$212,000.00
10589609	CLSD	36686	Elizabeth	Lake Villa	Lake	3/2/2020	$213,000.00
10577209	CLSD	682	Auburn	Lindenhurst	Lake	3/25/2020	$213,000.00
10553375	CLSD	3564	Crescent	Gurnee	Lake	3/5/2020	$215,000.00
10591407	CLSD	17753	Kewaunee	Grayslake	Lake	3/13/2020	$215,000.00
10608945	CLSD	940	IDLEWILD	Mundelein	Lake	3/13/2020	$215,000.00
10630688	CLSD	19347	Prospect	Mundelein	Lake	3/19/2020	$215,000.00
10628752	CLSD	28659	High	Ingleside	Lake	3/25/2020	$215,000.00
10650094	CLSD	822	Roberts	Winthrop Harbor	Lake	3/31/2020	$215,000.00
10603996	CLSD	180	Knobb Hill	Gurnee	Lake	3/6/2020	$218,800.00
10638067	CLSD	2498	Old Pond	Round Lake Beach	Lake	3/20/2020	$219,500.00
10597577	CLSD	2417	Sunset	Lindenhurst	Lake	3/30/2020	$219,550.00
10616808	CLSD	24946	Lakeview	Lake Villa	Lake	3/9/2020	$220,000.00
10604237	CLSD	225	Burnett	Lake Villa	Lake	3/13/2020	$220,000.00
10609729	CLSD	250	Prairie	Round Lake	Lake	3/20/2020	$220,000.00
10635433	CLSD	2631	Atlantic	Waukegan	Lake	3/20/2020	$220,000.00
10625538	CLSD	172	Willow	Ingleside	Lake	3/3/2020	$222,500.00
10613965	CLSD	1921	MARSH MEADOW	Round Lake	Lake	3/18/2020	$223,000.00
10605014	CLSD	604	Ardmore	Libertyville	Lake	3/20/2020	$223,000.00

10396539	CLSD	2028	Hardwood Path	Lake Villa	Lake	3/25/2020	$223,000.00
10637404	CLSD	30	Old Mill	Antioch	Lake	3/19/2020	$223,600.00
10610039	CLSD	1125	Morris	Beach Park	Lake	3/18/2020	$224,000.00
10598896	CLSD	422	MEADOW MIST	Round Lake	Lake	3/2/2020	$224,900.00
10552782	CLSD	326	Rock Hall	Grayslake	Lake	3/20/2020	$224,900.00
10426455	CLSD	27	Highland	Grayslake	Lake	3/6/2020	$225,000.00
10546576	CLSD	17647	Warren	Grayslake	Lake	3/16/2020	$225,000.00
10644646	CLSD	2411	Heron	Lindenhurst	Lake	3/16/2020	$225,000.00
10337448	CLSD	1910	Marigold	Round Lake	Lake	3/20/2020	$225,000.00
10610874	CLSD	813	Summit	Wauconda	Lake	3/20/2020	$225,000.00
10521098	CLSD	208	Oakton	Lake Villa	Lake	3/27/2020	$225,000.00
10647009	CLSD	517	Arbour	Mundelein	Lake	3/27/2020	$225,000.00
10582188	CLSD	125	Chesapeake Bay	Winthrop Harbor	Lake	3/27/2020	$225,000.00
10600769	CLSD	19376	Fairview	Mundelein	Lake	3/3/2020	$227,000.00
10616928	CLSD	167	Honeysuckle	Round Lake Beach	Lake	3/4/2020	$227,000.00
10630590	CLSD	26132	Blackhawk	Ingleside	Lake	3/16/2020	$227,000.00
10612502	CLSD	2164	Mohican	Round Lake Heights	Lake	3/23/2020	$227,000.00
10624794	CLSD	1614	20th	Zion	Lake	3/30/2020	$227,000.00
10634637	CLSD	25148	Buena	Lake Villa	Lake	3/31/2020	$227,000.00
10543229	CLSD	974	CAMBRIDGE	Grayslake	Lake	3/31/2020	$228,000.00
10518731	CLSD	848	Sterling Heights	Antioch	Lake	3/24/2020	$229,990.00
10600626	CLSD	1505	Ansley	Mundelein	Lake	3/13/2020	$230,000.00
10594551	CLSD	64	NETHERLANDS	Antioch	Lake	3/19/2020	$230,000.00
10648478	CLSD	265	Robincrest	Lindenhurst	Lake	3/25/2020	$231,000.00
10510503	CLSD	131	RAYMOND	Barrington	Lake	3/2/2020	$232,500.00
10541861	CLSD	3	Green	Lake Bluff	Lake	3/5/2020	$234,000.00
10524812	CLSD	3005	13th	Winthrop Harbor	Lake	3/16/2020	$234,000.00
10614014	CLSD	1297	Mayfair	Grayslake	Lake	3/19/2020	$234,000.00
10612344	CLSD	37112	Parma	Lake Villa	Lake	3/4/2020	$235,000.00
10636598	CLSD	3069	Southern Hills	Wadsworth	Lake	3/11/2020	$235,000.00
10627795	CLSD	276	Jubilee	Hainesville	Lake	3/13/2020	$235,000.00
10622460	CLSD	42379	Addison	Antioch	Lake	3/23/2020	$235,000.00
10627488	CLSD	34191	Bluestem	Round Lake	Lake	3/25/2020	$235,000.00
10612928	CLSD	524	Park	Libertyville	Lake	3/26/2020	$235,000.00
10628942	CLSD	23516	East	Lake Zurich	Lake	3/28/2020	$235,000.00
10633465	CLSD	36513	Grandwood	Gurnee	Lake	3/31/2020	$235,000.00
10627672	CLSD	32301	PRAIRIE VIEW	Lakemoor	Lake	3/31/2020	$235,000.00
10536342	CLSD	128	Bluff	Grayslake	Lake	3/2/2020	$237,500.00
10576461	CLSD	28050	Cape Cod	Lakemoor	Lake	3/6/2020	$237,500.00
10641000	CLSD	452	WINSOR	Antioch	Lake	3/19/2020	$238,000.00
10633176	CLSD	360	Sagebrush	Round Lake	Lake	3/20/2020	$239,900.00
10347049	CLSD	1107	Golf	Highland Park	Lake	3/16/2020	$240,000.00
10596268	CLSD	865	Burton	Highland Park	Lake	3/16/2020	$240,000.00
10633844	CLSD	3333	Burr Oak	Waukegan	Lake	3/31/2020	$240,000.00
10308588	CLSD	566	Meadowview	Wauconda	Lake	3/2/2020	$241,500.00
10619557	CLSD	1029	Norfolk	Grayslake	Lake	3/3/2020	$245,000.00
10619667	CLSD	351	Cambridge	Grayslake	Lake	3/4/2020	$245,000.00
10572862	CLSD	599	Valley View	Antioch	Lake	3/6/2020	$245,000.00
10624578	CLSD	18	DURHAM	Round Lake	Lake	3/9/2020	$245,000.00
10588746	CLSD	1307	London	Grayslake	Lake	3/16/2020	$245,000.00

10561744 CLSD	924	FRENCH	Mundelein	Lake	3/23/2020	$245,000.00
10599698 CLSD	13780	Wadsworth	Wadsworth	Lake	3/27/2020	$245,000.00
10611186 CLSD	732	SADDLEWOOD	Wauconda	Lake	3/12/2020	$246,000.00
10619532 CLSD	454	CALIFORNIA	Mundelein	Lake	3/6/2020	$248,000.00
10440911 CLSD	610	Knollwood	Ingleside	Lake	3/13/2020	$248,000.00
10613220 CLSD	39550	Queensbury	Beach Park	Lake	3/10/2020	$249,000.00
10629874 CLSD	456	SAVOY	Round Lake	Lake	3/13/2020	$249,000.00
10624216 CLSD	23869	High Ridge	Lake Zurich	Lake	3/27/2020	$249,900.00
10302036 CLSD	1742	Natures	Lindenhurst	Lake	3/2/2020	$250,000.00
10611422 CLSD	302	Heather	Grayslake	Lake	3/9/2020	$250,000.00
10637203 CLSD	215	LISK	Hainesville	Lake	3/17/2020	$250,000.00
10613417 CLSD	39075	Winchester	Wadsworth	Lake	3/4/2020	$255,000.00
10525667 CLSD	915	Prague	Buffalo Grove	Lake	3/6/2020	$255,000.00
10623814 CLSD	4560	Lawn	Waukegan	Lake	3/16/2020	$255,000.00
10598916 CLSD	1301	Andover	Mundelein	Lake	3/25/2020	$255,000.00
10630126 CLSD	31673	Pineview	Lakemoor	Lake	3/9/2020	$258,000.00
10528303 CLSD	345	Megan	Winthrop Harbor	Lake	3/30/2020	$258,000.00
10435165 CLSD	6299	Sleepy Hollow	Gurnee	Lake	3/6/2020	$260,000.00
10581420 CLSD	3609	Eastway	Island Lake	Lake	3/9/2020	$260,000.00
10594900 CLSD	25516	BROOKS FARM	Round Lake	Lake	3/10/2020	$260,000.00
10439679 CLSD	21	Monterey	Vernon Hills	Lake	3/11/2020	$260,000.00
10321260 CLSD	935	Woodland	Antioch	Lake	3/12/2020	$260,000.00
10485398 CLSD	932	Wilmette	Lake Zurich	Lake	3/5/2020	$261,500.00
10603376 CLSD	1456	Baroque	Volo	Lake	3/24/2020	$262,000.00
10617409 CLSD	245	Meadowlark	Lindenhurst	Lake	3/4/2020	$262,500.00
10574569 CLSD	25138	Lake	Ingleside	Lake	3/6/2020	$264,000.00
10616319 CLSD	1937	Taos	Volo	Lake	3/24/2020	$264,970.00
10153859 CLSD	926	Cedar	Deerfield	Lake	3/6/2020	$265,000.00
10529501 CLSD	28313	Lakeview	McHenry	Lake	3/24/2020	$265,000.00
10629519 CLSD	960	Tylerton	Grayslake	Lake	3/31/2020	$265,000.00
10581314 CLSD	27071	Chris Larkin	Ingleside	Lake	3/31/2020	$265,000.00
10566725 CLSD	1320	Dunleer	Mundelein	Lake	3/27/2020	$267,500.00
10619547 CLSD	33261	GREENTREE	Grayslake	Lake	3/2/2020	$268,000.00
10634370 CLSD	11	RED HAW	Lake Zurich	Lake	3/19/2020	$268,000.00
10545970 CLSD	6207	Sleepy Hollow	Gurnee	Lake	3/26/2020	$268,000.00
10633009 CLSD	707	Franklin	Lindenhurst	Lake	3/30/2020	$268,000.00
10360002 CLSD	1318	GOLF	Highland Park	Lake	3/31/2020	$268,223.00
10601169 CLSD	1814	Alta 237	Volo	Lake	3/2/2020	$268,642.00
10579070 CLSD	878	Forest View	Antioch	Lake	3/17/2020	$269,900.00
10569605 CLSD	1047	Trudy	Fox Lake	Lake	3/27/2020	$270,000.00
10581945 CLSD	540	Cypress Bridge	Lake Zurich	Lake	3/27/2020	$270,000.00
10578630 CLSD	25524	Brooks Farm	Round Lake	Lake	3/23/2020	$270,500.00
10431810 CLSD	806	Braemar	Mundelein	Lake	3/3/2020	$271,500.00
10608728 CLSD	1666	Innsbrook	Volo	Lake	3/9/2020	$272,000.00
10607944 CLSD	17866	Hampshire	Gurnee	Lake	3/17/2020	$273,000.00
10615598 CLSD	410	Jackson	Grayslake	Lake	3/5/2020	$275,000.00
10612503 CLSD	1038	MOUNT VERNON	Grayslake	Lake	3/30/2020	$275,000.00
10600773 CLSD	234	Annapolis	Vernon Hills	Lake	3/16/2020	$276,000.00
10596788 CLSD	2765	Liberty Lakes	Wauconda	Lake	3/2/2020	$279,000.00
10595041 CLSD	130	Summit	Highwood	Lake	3/16/2020	$279,000.00

10550443	CLSD	878	Marble	Volo	Lake	3/25/2020	$279,000.00
10633987	CLSD	506	Blackstone	Lake Villa	Lake	3/31/2020	$279,000.00
10558489	CLSD	2546	Bluewater	Wauconda	Lake	3/5/2020	$280,000.00
10610926	CLSD	110	Lorraine	Lake Zurich	Lake	3/11/2020	$280,000.00
10624605	CLSD	1200	Williamsburg	Grayslake	Lake	3/16/2020	$280,000.00
10466512	CLSD	473	Ridge	Highland Park	Lake	3/16/2020	$280,000.00
10627033	CLSD	240	Thrush	Lindenhurst	Lake	3/20/2020	$280,000.00
10643645	CLSD	1695	CLAVEY	Highland Park	Lake	3/23/2020	$280,000.00
10549283	CLSD	3	James	Hawthorn Woods	Lake	3/27/2020	$280,000.00
10623972	CLSD	1289	Mayfair	Grayslake	Lake	3/20/2020	$281,800.00
10553496	CLSD	3268	Victoria	Waukegan	Lake	3/6/2020	$282,000.00
10636164	CLSD	816	Walton	Grayslake	Lake	3/31/2020	$283,000.00
10572313	CLSD	32	Oak	Grayslake	Lake	3/12/2020	$285,000.00
10562947	CLSD	1059	Normandy	Waukegan	Lake	3/13/2020	$285,000.00
10520738	CLSD	45	Webb	Grayslake	Lake	3/31/2020	$286,000.00
10608648	CLSD	23475	Valley	Lake Zurich	Lake	3/2/2020	$287,000.00
10359309	CLSD	913	Woodland	Wauconda	Lake	3/31/2020	$287,250.00
10546150	CLSD	3866	Harper	Gurnee	Lake	3/2/2020	$288,000.00
10600298	CLSD	411	Lamont	Buffalo Grove	Lake	3/6/2020	$288,000.00
10592559	CLSD	34092	Sulkey	Grayslake	Lake	3/9/2020	$289,000.00
10542042	CLSD	771	Broadview	Highland Park	Lake	3/20/2020	$290,000.00
10603819	CLSD	600	Garfield	Lake Bluff	Lake	3/23/2020	$290,000.00
10592234	CLSD	4669	Kings	Gurnee	Lake	3/2/2020	$292,500.00
10610917	CLSD	810	Park	Lake Villa	Lake	3/16/2020	$293,000.00
10616686	CLSD	1416	Sandy Pass	Lake Zurich	Lake	3/16/2020	$293,000.00
10579411	CLSD	1134	Bellows	Volo	Lake	3/24/2020	$294,000.00
10608067	CLSD	229	Fox Hill	Buffalo Grove	Lake	3/3/2020	$295,000.00
10621853	CLSD	442	Oak Grove	Wauconda	Lake	3/17/2020	$295,000.00
10641159	CLSD	1310	BENTON	Lake Villa	Lake	3/26/2020	$295,000.00
10498268	CLSD	5215	Grand	Gurnee	Lake	3/27/2020	$295,000.00
10618660	CLSD	10	Augusta	Vernon Hills	Lake	3/19/2020	$299,000.00
10499883	CLSD	615	LINCOLN	Libertyville	Lake	3/2/2020	$300,000.00
10551448	CLSD	155	Maywood	Lake Forest	Lake	3/5/2020	$300,000.00
10412693	CLSD	6347	Doral	Gurnee	Lake	3/6/2020	$300,000.00
10531565	CLSD	169	Riverside Island	Fox Lake	Lake	3/13/2020	$300,000.00
10606038	CLSD	798	Wexford	Grayslake	Lake	3/13/2020	$300,000.00
10626629	CLSD	2660	Delaware	Lindenhurst	Lake	3/30/2020	$300,000.00
10610157	CLSD	3300	Monterey	Wadsworth	Lake	3/13/2020	$302,000.00
10627085	CLSD	1817	Friars	Mundelein	Lake	3/23/2020	$303,000.00
10607976	CLSD	927	Russell	Mundelein	Lake	3/20/2020	$303,500.00
10633489	CLSD	3129	Concord	Wadsworth	Lake	3/10/2020	$304,000.00
10518214	CLSD	244	Long Hill	Gurnee	Lake	3/31/2020	$304,500.00
10608771	CLSD	17487	Huntington	Grayslake	Lake	3/6/2020	$305,000.00
10564206	CLSD	1145	Erica	Wauconda	Lake	3/18/2020	$305,000.00
10596839	CLSD	202	Lowell	Vernon Hills	Lake	3/19/2020	$305,000.00
10559123	CLSD	2451	Chadwick	Mundelein	Lake	3/20/2020	$305,000.00
10559961	CLSD	342	Prospect	Lake Bluff	Lake	3/23/2020	$306,000.00
10577298	CLSD	122	Braxton	Grayslake	Lake	3/13/2020	$307,000.00
10637017	CLSD	1591	Amos Bennett	Grayslake	Lake	3/31/2020	$308,000.00
10599563	CLSD	1005	CASTLEWOOD	Deerfield	Lake	3/20/2020	$309,500.00

10537235	CLSD	2025	FOXRIDGE	Island Lake	Lake	3/5/2020	$310,000.00
10617908	CLSD	1145	Devonshire	Buffalo Grove	Lake	3/12/2020	$312,000.00
10585330	CLSD	103	Asheville	Vernon Hills	Lake	3/6/2020	$312,500.00
10631278	CLSD	182	Linden	Lake Forest	Lake	3/16/2020	$312,500.00
10628286	CLSD	13360	High Ridge	Wadsworth	Lake	3/20/2020	$312,500.00
10617064	CLSD	1967	Pinehurst	Libertyville	Lake	3/18/2020	$314,000.00
10627698	CLSD	1148	Goldfinch	Antioch	Lake	3/27/2020	$314,054.00
10617751	CLSD	549	Michigan	Highland Park	Lake	3/4/2020	$315,000.00
10596696	CLSD	2449	Heron	Wauconda	Lake	3/13/2020	$315,000.00
10585162	CLSD	39015	North	Beach Park	Lake	3/25/2020	$315,000.00
10620910	CLSD	2343	Bluewater	Wauconda	Lake	3/20/2020	$316,500.00
10577467	CLSD	987	Knollwood	Buffalo Grove	Lake	3/17/2020	$318,000.00
10578043	CLSD	2340	Kelsey	Lindenhurst	Lake	3/28/2020	$318,000.00
10624433	CLSD	608	Fairborn	Round Lake	Lake	3/17/2020	$319,000.00
10602407	CLSD	400	Winsor	Antioch	Lake	3/2/2020	$320,000.00
10581304	CLSD	16	Red Haw	Lake Zurich	Lake	3/17/2020	$320,000.00
10591084	CLSD	211	4th	Libertyville	Lake	3/19/2020	$320,000.00
10615326	CLSD	1184	Laurel	Gurnee	Lake	3/2/2020	$325,000.00
10616849	CLSD	18760	Ash	Lake Villa	Lake	3/13/2020	$325,000.00
10607199	CLSD	618	Blazing Star	Lake Villa	Lake	3/16/2020	$325,000.00
10517159	CLSD	330	AMBRIA	Mundelein	Lake	3/17/2020	$325,000.00
10579826	CLSD	1020	Providence	Buffalo Grove	Lake	3/17/2020	$325,000.00
10531837	CLSD	3372	Epstein	Mundelein	Lake	3/31/2020	$325,000.00
10572847	CLSD	53	Mionske	Lake Zurich	Lake	3/6/2020	$325,690.00
10605110	CLSD	275	Cross Creek	Lindenhurst	Lake	3/13/2020	$327,000.00
10627452	CLSD	1015	Harris	Grayslake	Lake	3/20/2020	$327,375.00
10578775	CLSD	1017	Galena	Volo	Lake	3/4/2020	$327,500.00
10596490	CLSD	1300	Andover	Mundelein	Lake	3/17/2020	$328,000.00
10614947	CLSD	625	Cortland	Lake Zurich	Lake	3/12/2020	$329,901.00
10408476	CLSD	29631	Birch	Lake Bluff	Lake	3/6/2020	$330,000.00
10590150	CLSD	22	Hawley	Grayslake	Lake	3/9/2020	$330,000.00
10624711	CLSD	23549	Overhill	Lake Zurich	Lake	3/23/2020	$330,000.00
10604450	CLSD	931	Salceda	Mundelein	Lake	3/24/2020	$330,000.00
10588076	CLSD	1575	McClellan	Lindenhurst	Lake	3/27/2020	$330,000.00
10470959	CLSD	1600	Verde	Mundelein	Lake	3/30/2020	$331,000.00
10104192	CLSD	37732	Cedar Lake	Lake Villa	Lake	3/6/2020	$331,875.00
10401390	CLSD	837	4th	Libertyville	Lake	3/6/2020	$333,000.00
10607585	CLSD	7	Cloverdale	Buffalo Grove	Lake	3/18/2020	$337,000.00
10386222	CLSD	416	WEST TRL	Grayslake	Lake	3/2/2020	$337,500.00
10599438	CLSD	24976	Pawnee	Lake Barrington	Lake	3/24/2020	$337,500.00
10673992	CLSD	1128	Garfield	Libertyville	Lake	3/5/2020	$337,745.00
10605234	CLSD	1313	Warrington	Deerfield	Lake	3/2/2020	$340,000.00
10547816	CLSD	44	LAGOON	Hawthorn Woods	Lake	3/2/2020	$340,000.00
10448910	CLSD	1165	Polo	Lake Forest	Lake	3/16/2020	$340,000.00
10517602	CLSD	196	Peregrine	Hawthorn Woods	Lake	3/27/2020	$340,000.00
10585123	CLSD	1742	Somerset	Mundelein	Lake	3/11/2020	$345,000.00
10630970	CLSD	704	Spring Farm	Lake Villa	Lake	3/12/2020	$345,000.00
10544957	CLSD	17106	Jenna	Gurnee	Lake	3/26/2020	$345,000.00
10629744	CLSD	447	Red Rock	Lindenhurst	Lake	3/30/2020	$345,000.00
10319049	CLSD	725	Trailside	Lake Zurich	Lake	3/16/2020	$347,500.00

10552685 CLSD	1081	Westfield	Mundelein	Lake	3/16/2020	$348,000.00
10646073 CLSD	786	Red Bridge	Lake Zurich	Lake	3/26/2020	$348,000.00
10523317 CLSD	288	Long Hill	Gurnee	Lake	3/13/2020	$349,900.00
10611973 CLSD	25	Amber	Lindenhurst	Lake	3/9/2020	$350,000.00
10618796 CLSD	18847	Chatham	Lake Villa	Lake	3/10/2020	$350,000.00
10631749 CLSD	181	Zelinger	Antioch	Lake	3/11/2020	$350,000.00
10591297 CLSD	1720	Ambria	Mundelein	Lake	3/18/2020	$350,000.00
10655982 CLSD	1160	Kenton	Deerfield	Lake	3/19/2020	$350,000.00
10611380 CLSD	1164	Gavin	Lake Forest	Lake	3/19/2020	$350,000.00
10623092 CLSD	467	ROCKLAND	Lake Bluff	Lake	3/27/2020	$350,000.00
10629235 CLSD	24126	Bayview	Antioch	Lake	3/30/2020	$350,000.00
10582701 CLSD	25978	Oak Hills	Lake Barrington	Lake	3/31/2020	$350,000.00
10595444 CLSD	2927	Cypress	Wadsworth	Lake	3/6/2020	$351,500.00
10603285 CLSD	140	Mainsail	Third Lake	Lake	3/13/2020	$354,000.00
10618195 CLSD	571	Ravinia	Highland Park	Lake	3/6/2020	$355,000.00
10622020 CLSD	400	Oak Grove	Wauconda	Lake	3/20/2020	$355,500.00
10611063 CLSD	1404	Shefield	Mundelein	Lake	3/5/2020	$356,900.00
10614835 CLSD	236	Beachview	North Barrington	Lake	3/27/2020	$360,000.00
10569937 CLSD	408	Sandy	Libertyville	Lake	3/16/2020	$365,000.00
10636199 CLSD	1596	Wakefield	Mundelein	Lake	3/23/2020	$365,450.00
10567592 CLSD	1671	Savannah	Mundelein	Lake	3/30/2020	$366,000.00
10508910 CLSD	558	Braemar	Barrington	Lake	3/16/2020	$367,500.00
10636284 CLSD	2532	FOREST	Lindenhurst	Lake	3/20/2020	$367,500.00
10551425 CLSD	1005	Talbot	Lake Bluff	Lake	3/26/2020	$368,500.00
10609049 CLSD	28912	Park	Barrington	Lake	3/16/2020	$370,000.00
10598315 CLSD	1019	Dilleys	Gurnee	Lake	3/13/2020	$372,000.00
10588723 CLSD	241	Washington	Lake Bluff	Lake	3/20/2020	$375,000.00
10606511 CLSD	54	TOURNAMENT	Hawthorn Woods	Lake	3/20/2020	$375,000.00
10602868 CLSD	154	Harbor	Lake Zurich	Lake	3/23/2020	$375,000.00
10582220 CLSD	550	Elm	Deerfield	Lake	3/25/2020	$375,000.00
10633667 CLSD	40387	Reed	Wadsworth	Lake	3/16/2020	$376,500.00
10591939 CLSD	1122	Golf	Libertyville	Lake	3/12/2020	$380,000.00
10460277 CLSD	616	Burton	Highland Park	Lake	3/13/2020	$382,000.00
10629984 CLSD	2	Robert	Hawthorn Woods	Lake	3/25/2020	$384,000.00
10622504 CLSD	6501	OLD OAK	Libertyville	Lake	3/2/2020	$385,000.00
10626050 CLSD	34076	Jenna	Gurnee	Lake	3/16/2020	$385,000.00
10612677 CLSD	28844	Manitoba	McHenry	Lake	3/18/2020	$385,000.00
10627984 CLSD	127	Glen	Hawthorn Woods	Lake	3/24/2020	$385,000.00
10608842 CLSD	596	Cherokee	Lake Forest	Lake	3/2/2020	$386,400.00
10616100 CLSD	708	LANDEN	Lake Villa	Lake	3/13/2020	$387,000.00
10397848 CLSD	15	Dukes	Lincolnshire	Lake	3/30/2020	$387,000.00
10583463 CLSD	24	Hallbraith	North Barrington	Lake	3/13/2020	$390,000.00
10605989 CLSD	1164	Furlong	Libertyville	Lake	3/18/2020	$390,000.00
10620732 CLSD	2245	Bellview	Gurnee	Lake	3/31/2020	$392,500.00
10606498 CLSD	38636	Munn	Lake Villa	Lake	3/20/2020	$394,900.00
10625474 CLSD	4974	Red Pine	Gurnee	Lake	3/27/2020	$395,000.00
10615950 CLSD	3399	Krenn	Highland Park	Lake	3/30/2020	$395,000.00
10571763 CLSD	1105	Rebecca	Libertyville	Lake	3/31/2020	$398,000.00
10563150 CLSD	421	Westleigh	Lake Forest	Lake	3/2/2020	$399,000.00
10485435 CLSD	48	Wiltshire	Lincolnshire	Lake	3/16/2020	$399,000.00

10410438	CLSD	523	Ela	Barrington	Lake	3/23/2020	$399,000.00
10481472	CLSD	618	Paddock	Libertyville	Lake	3/2/2020	$400,000.00
10609939	CLSD	1686	Haig Point	Vernon Hills	Lake	3/6/2020	$400,000.00
10451007	CLSD	1122	Kenton	Deerfield	Lake	3/13/2020	$400,000.00
10598137	CLSD	440	Old Rand	Lake Zurich	Lake	3/13/2020	$400,000.00
10545745	CLSD	999	MARLBOROUGH	Barrington	Lake	3/12/2020	$403,000.00
10625105	CLSD	17178	Tiger Tail	Gurnee	Lake	3/27/2020	$403,000.00
10473689	CLSD	26	Pheasant Run	Hawthorn Woods	Lake	3/23/2020	$405,000.00
10606557	CLSD	1091	Pearlman	Lake Zurich	Lake	3/23/2020	$405,000.00
10610907	CLSD	870	SAVOY	Lake Zurich	Lake	3/23/2020	$405,000.00
10643022	CLSD	780	Stillwater	Lake Zurich	Lake	3/25/2020	$406,000.00
10559097	CLSD	106	GLENDALE	Barrington	Lake	3/4/2020	$407,500.00
10599954	CLSD	28192	Maple	Barrington	Lake	3/25/2020	$408,000.00
10634553	CLSD	5670	Trinity	Gurnee	Lake	3/23/2020	$409,000.00
10447921	CLSD	2	ANDOVER	Lincolnshire	Lake	3/3/2020	$410,000.00
10556747	CLSD	1240	William	Lake Zurich	Lake	3/30/2020	$410,000.00
10538892	CLSD	1041	Tamarack	Libertyville	Lake	3/13/2020	$415,000.00
10529084	CLSD	515	Twin Oaks	Lake Villa	Lake	3/18/2020	$420,000.00
10567206	CLSD	1107	Warren	Vernon Hills	Lake	3/18/2020	$420,000.00
10507588	CLSD	1168	Berkshire	Barrington	Lake	3/2/2020	$421,000.00
10636119	CLSD	7414	BITTERSWEET	Gurnee	Lake	3/24/2020	$421,000.00
10534688	CLSD	23740	Hearthside	Deer Park	Lake	3/13/2020	$422,000.00
10543597	CLSD	4103	Robert Parker Coffin	Long Grove	Lake	3/25/2020	$422,000.00
10590633	CLSD	1412	Amy	Libertyville	Lake	3/20/2020	$425,000.00
10631320	CLSD	25071	North	Antioch	Lake	3/23/2020	$425,000.00
10527468	CLSD	207	Woodland	Highland Park	Lake	3/31/2020	$425,000.00
10567605	CLSD	2785	Daiquiri	Riverwoods	Lake	3/2/2020	$430,000.00
10389657	CLSD	15384	IL Route 173	Wadsworth	Lake	3/9/2020	$430,000.00
10115204	CLSD	410	Washington	Lake Forest	Lake	3/10/2020	$430,000.00
10584122	CLSD	1470	Larchmont	Buffalo Grove	Lake	3/5/2020	$432,000.00
10476262	CLSD	8138	Boulder	Long Grove	Lake	3/6/2020	$435,000.00
10623961	CLSD	380	SHARON	Barrington	Lake	3/18/2020	$435,000.00
10571437	CLSD	1261	THORNDALE	Lake Zurich	Lake	3/4/2020	$436,500.00
10575163	CLSD	1536	Hackberry	Deerfield	Lake	3/16/2020	$437,000.00
10598468	CLSD	429	Cedar	Buffalo Grove	Lake	3/20/2020	$440,000.00
10610699	CLSD	1118	Larraway	Buffalo Grove	Lake	3/24/2020	$440,000.00
10534959	CLSD	420	MORGAN	Fox River Grove	Lake	3/31/2020	$440,000.00
10621166	CLSD	118	4th	Libertyville	Lake	3/20/2020	$441,500.00
10630023	CLSD	255	Ridgeway	Libertyville	Lake	3/31/2020	$443,500.00
10614824	CLSD	10	Shenandoah	Hawthorn Woods	Lake	3/6/2020	$445,000.00
10424986	CLSD	26946	Oak	Wauconda	Lake	3/6/2020	$445,000.00
10486205	CLSD	1225	Deere Park	Deerfield	Lake	3/18/2020	$450,000.00
10623764	CLSD	1720	Cedar Glen	Libertyville	Lake	3/26/2020	$450,000.00
10637085	CLSD	1670	Strath Erin	Highland Park	Lake	3/27/2020	$450,000.00
10625197	CLSD	9	Lagoon	Hawthorn Woods	Lake	3/19/2020	$455,000.00
10578139	CLSD	1051	Vineyard	Gurnee	Lake	3/31/2020	$455,000.00
10615803	CLSD	1137	TIMBER PASS	Mundelein	Lake	3/27/2020	$457,400.00
10475380	CLSD	3370	Brook	Highland Park	Lake	3/4/2020	$460,000.00
10551469	CLSD	1755	Ridgelee	Highland Park	Lake	3/4/2020	$460,000.00
10595871	CLSD	1462	Maidstone	Vernon Hills	Lake	3/5/2020	$460,000.00

10565005 CLSD	1720	Christopher	Deerfield	Lake	3/20/2020	$460,000.00
10605462 CLSD	3264	Timberwood	Riverwoods	Lake	3/4/2020	$465,000.00
10600983 CLSD	28618	Champions	Mundelein	Lake	3/13/2020	$465,000.00
10569572 CLSD	22428	Newberry	Kildeer	Lake	3/30/2020	$468,000.00
10601651 CLSD	28922	Bluff	Barrington	Lake	3/19/2020	$469,000.00
10611062 CLSD	1009	Crestfield	Libertyville	Lake	3/30/2020	$470,000.00
10469385 CLSD	5320	Oak Grove	Long Grove	Lake	3/13/2020	$472,500.00
10606284 CLSD	1582	HAZELNUT	Mundelein	Lake	3/13/2020	$475,000.00
10561955 CLSD	27070	Kensington	Lake Barrington	Lake	3/16/2020	$475,000.00
10361107 CLSD	940	Oak Spring	Libertyville	Lake	3/27/2020	$475,000.00
10482399 CLSD	20839	EXMOOR	Barrington	Lake	3/13/2020	$477,000.00
10456085 CLSD	2316	Congressional	Riverwoods	Lake	3/3/2020	$477,500.00
10526758 CLSD	26245	Saint Marys	Libertyville	Lake	3/6/2020	$480,000.00
10525199 CLSD	892	Warwick	Lake Zurich	Lake	3/10/2020	$480,000.00
10576002 CLSD	441	Broadview	Highland Park	Lake	3/12/2020	$480,000.00
10613217 CLSD	8101	Boulder	Long Grove	Lake	3/30/2020	$480,000.00
10621270 CLSD	942	Crestfield	Libertyville	Lake	3/20/2020	$482,500.00
10570108 CLSD	1205	Virginia	Libertyville	Lake	3/30/2020	$484,000.00
10588203 CLSD	1212	Crane	Libertyville	Lake	3/3/2020	$490,000.00
10528544 CLSD	1129	Loyola	Libertyville	Lake	3/4/2020	$490,000.00
10618778 CLSD	1800	Josilyn	Libertyville	Lake	3/12/2020	$490,000.00
10463386 CLSD	411	Muirfield	Riverwoods	Lake	3/5/2020	$493,000.00
10598139 CLSD	507	Pleasant	Highland Park	Lake	3/30/2020	$493,500.00
10411623 CLSD	1160	Estes	Lake Forest	Lake	3/6/2020	$495,000.00
10563899 CLSD	49	Palisades	Hawthorn Woods	Lake	3/3/2020	$500,000.00
10587487 CLSD	13610	Greenview	Wadsworth	Lake	3/16/2020	$500,000.00
10569622 CLSD	21846	Murfield	Ivanhoe	Lake	3/20/2020	$500,000.00
10556515 CLSD	2	Fox Trail	Lincolnshire	Lake	3/30/2020	$500,000.00
10460457 CLSD	243	Linden	Barrington	Lake	3/2/2020	$502,350.00
10643446 CLSD	1283	Oak Trail	Libertyville	Lake	3/20/2020	$505,000.00
10613360 CLSD	27320	Hickory Rdg	Lake Barrington	Lake	3/31/2020	$510,000.00
10612922 CLSD	1990	Sheridan	Buffalo Grove	Lake	3/12/2020	$512,500.00
10445433 CLSD	20929	Heather	Kildeer	Lake	3/17/2020	$520,000.00
10604357 CLSD	435	Shannon	Deerfield	Lake	3/3/2020	$522,500.00
10495043 CLSD	111	Woodland	Lake Barrington	Lake	3/20/2020	$525,000.00
10492367 CLSD	15570	ROCKLAND	Libertyville	Lake	3/25/2020	$525,000.00
10625601 CLSD	661	Leon	Tower Lakes	Lake	3/27/2020	$525,000.00
10606288 CLSD	2	Meadow	Hawthorn Woods	Lake	3/23/2020	$527,500.00
10621173 CLSD	990	Deerpath	Lake Forest	Lake	3/10/2020	$530,000.00
10564066 CLSD	1115	St Johns	Highland Park	Lake	3/16/2020	$530,000.00
10581251 CLSD	1155	Fairview	Lake Forest	Lake	3/2/2020	$535,000.00
10324125 CLSD	308	Signe	Lake Bluff	Lake	3/19/2020	$535,000.00
10628377 CLSD	42	Candlewood	North Barrington	Lake	3/12/2020	$540,000.00
10563230 CLSD	24631	Lagoon	Cary	Lake	3/12/2020	$540,000.00
10610165 CLSD	2180	Kipling	Highland Park	Lake	3/19/2020	$540,000.00
10603849 CLSD	105	FLINT CREEK	Hawthorn Woods	Lake	3/11/2020	$540,837.00
10616872 CLSD	3704	Deerwood	Long Grove	Lake	3/5/2020	$546,000.00
10571007 CLSD	1144	Melvin	Highland Park	Lake	3/13/2020	$550,000.00
10496731 CLSD	1381	Elmwood	Deerfield	Lake	3/30/2020	$550,000.00
10463653 CLSD	16123	Hill Grove	Wadsworth	Lake	3/30/2020	$550,000.00

10377496	CLSD	355	Newman	Lake Bluff	Lake	3/13/2020	$555,000.00
10609586	CLSD	390	Marseilles	Vernon Hills	Lake	3/9/2020	$557,500.00
10607961	CLSD	6534	Saddle Ridge	Long Grove	Lake	3/20/2020	$558,250.00
10605108	CLSD	6524	Saddle Ridge	Long Grove	Lake	3/19/2020	$560,000.00
10480388	CLSD	535	Sherry	Riverwoods	Lake	3/25/2020	$560,000.00
10622712	CLSD	348	CAMARGO	Vernon Hills	Lake	3/20/2020	$567,500.00
10601063	CLSD	360	Valley	Barrington	Lake	3/20/2020	$570,000.00
10589776	CLSD	1301	Annie	Libertyville	Lake	3/20/2020	$570,000.00
10554399	CLSD	615	Belvidere	Grayslake	Lake	3/27/2020	$570,000.00
10493547	CLSD	25179	Dante	Hawthorn Woods	Lake	3/5/2020	$575,000.00
10325608	CLSD	45	Wynstone	North Barrington	Lake	3/20/2020	$575,000.00
10589414	CLSD	6	Scarlet Oak	Hawthorn Woods	Lake	3/20/2020	$575,000.00
10536638	CLSD	107	East	Lake Barrington	Lake	3/30/2020	$575,000.00
10668065	CLSD	121	Hubbard	Hawthorn Woods	Lake	3/18/2020	$576,234.00
10660929	CLSD	28527	SEMINOLE	Ivanhoe	Lake	3/31/2020	$577,500.00
10617567	CLSD	1840	Savannah	Mundelein	Lake	3/30/2020	$578,371.00
10627671	CLSD	1527	Northwoods	Deerfield	Lake	3/27/2020	$579,000.00
10596308	CLSD	20725	Weatherstone	Kildeer	Lake	3/9/2020	$585,000.00
10541544	CLSD	309	Camelot	Libertyville	Lake	3/13/2020	$585,000.00
10588831	CLSD	857	Highland	Highland Park	Lake	3/30/2020	$585,000.00
10635446	CLSD	2921	Kingston	Buffalo Grove	Lake	3/31/2020	$585,000.00
10631579	CLSD	4	Windlake	Riverwoods	Lake	3/20/2020	$591,900.00
10510945	CLSD	743	Morningside	Lake Forest	Lake	3/17/2020	$597,500.00
10557875	CLSD	6358	Thackery	Libertyville	Lake	3/24/2020	$600,000.00
10544332	CLSD	244	Kenmore	Deerfield	Lake	3/19/2020	$607,500.00
10513094	CLSD	2067	Sheridan	Buffalo Grove	Lake	3/6/2020	$610,000.00
10450740	CLSD	80	Inverness	Lake Bluff	Lake	3/17/2020	$610,000.00
10419981	CLSD	571	Lexington	Lake Forest	Lake	3/20/2020	$615,000.00
10473974	CLSD	755	CAMELOT	Lake Forest	Lake	3/30/2020	$615,000.00
10622418	CLSD	670	Rockefeller	Lake Forest	Lake	3/6/2020	$624,000.00
10510203	CLSD	4487	Wellington	Long Grove	Lake	3/20/2020	$625,000.00
10620724	CLSD	195	Margate	Lake Bluff	Lake	3/27/2020	$630,000.00
10555429	CLSD	21040	Creekside	Kildeer	Lake	3/13/2020	$637,500.00
10610046	CLSD	60	Bristol	Lake Bluff	Lake	3/18/2020	$642,000.00
10515834	CLSD	332	Sheridan	Lake Bluff	Lake	3/11/2020	$650,000.00
10583130	CLSD	23276	Sanctuary Club	Kildeer	Lake	3/20/2020	$650,000.00
10519313	CLSD	996	Park	Highland Park	Lake	3/17/2020	$655,000.00
10634000	CLSD	275	Leslee	Highland Park	Lake	3/27/2020	$660,000.00
10488719	CLSD	14615	Somerset	Green Oaks	Lake	3/4/2020	$672,000.00
10600273	CLSD	2920	Dunstan	Buffalo Grove	Lake	3/11/2020	$673,047.00
10423020	CLSD	619	Ames	Libertyville	Lake	3/13/2020	$675,000.00
10582365	CLSD	140	Indian Tree	Highland Park	Lake	3/18/2020	$675,000.00
10625929	CLSD	1361	Cavell	Highland Park	Lake	3/25/2020	$675,000.00
10606646	CLSD	515	Shannon	Deerfield	Lake	3/30/2020	$675,000.00
10417389	CLSD	40669	North Newport	Antioch	Lake	3/2/2020	$680,000.00
10549022	CLSD	4537	Eleanor	Long Grove	Lake	3/23/2020	$680,000.00
10294770	CLSD	149	Pine Point	Highland Park	Lake	3/12/2020	$700,000.00
10645441	CLSD	26750	Country Estates	Barrington	Lake	3/25/2020	$710,000.00
10546452	CLSD	382	Basswood	Lake Forest	Lake	3/9/2020	$715,000.00
10482580	CLSD	2086	Malory	Highland Park	Lake	3/10/2020	$725,000.00

10448908	CLSD	1489	Heritage	Lake Forest	Lake	3/27/2020	$725,000.00
10509753	CLSD	671	Timber	Lake Forest	Lake	3/2/2020	$730,000.00
10126757	CLSD	635	Lake Shore	Wauconda	Lake	3/23/2020	$740,000.00
10611865	CLSD	1315	Hazel	Deerfield	Lake	3/16/2020	$745,000.00
10456043	CLSD	25396	Columbia Bay	Lake Villa	Lake	3/23/2020	$750,000.00
10599766	CLSD	4802	Preserve	Long Grove	Lake	3/18/2020	$755,000.00
10619319	CLSD	15	St Andrews	Deerfield	Lake	3/16/2020	$765,000.00
10599377	CLSD	33678	Lake Shore	Grayslake	Lake	3/20/2020	$765,000.00
10260900	CLSD	290	South Shore	Lake Forest	Lake	3/9/2020	$775,000.00
10555736	CLSD	49	June	Lake Forest	Lake	3/18/2020	$775,000.00
10525821	CLSD	215	Basswood	Lake Forest	Lake	3/30/2020	$795,000.00
10422454	CLSD	26349	Roberts	Barrington	Lake	3/20/2020	$800,000.00
10408516	CLSD	1429	Central	Deerfield	Lake	3/17/2020	$817,000.00
10576236	CLSD	1567	Conway	Lake Forest	Lake	3/17/2020	$820,000.00
10549583	CLSD	22333	Prairie	Kildeer	Lake	3/23/2020	$840,000.00
10606655	CLSD	211	Pine Point	Highland Park	Lake	3/17/2020	$845,000.00
10641307	CLSD	2354	Tennyson	Highland Park	Lake	3/13/2020	$850,000.00
10598792	CLSD	649	Forest Hill	Lake Forest	Lake	3/9/2020	$865,000.00
10628904	CLSD	72	Bexley	North Barrington	Lake	3/3/2020	$872,595.00
10538786	CLSD	1530	Anderson	Libertyville	Lake	3/30/2020	$877,000.00
10275395	CLSD	1222	Glencoe	Highland Park	Lake	3/20/2020	$889,000.00
10614451	CLSD	2415	Highmoor	Highland Park	Lake	3/4/2020	$900,000.00
10617440	CLSD	2200	Tennyson	Highland Park	Lake	3/31/2020	$910,000.00
10497268	CLSD	1150	North	Bannockburn	Lake	3/4/2020	$961,500.00
10420139	CLSD	2069	Knollwood	Lake Forest	Lake	3/27/2020	$975,000.00
10526161	CLSD	22411	Greenmeadow	Kildeer	Lake	3/18/2020	$990,000.00
10496561	CLSD	506	Forest Cove	Lake Bluff	Lake	3/30/2020	$1,047,500.00
10567844	CLSD	609	Maple	Lake Bluff	Lake	3/19/2020	$1,100,000.00
10389087	CLSD	1121	WARRINGTON	Deerfield	Lake	3/27/2020	$1,150,000.00
10266545	CLSD	1131	Warrington	Deerfield	Lake	3/17/2020	$1,165,000.00
10556422	CLSD	1985	Windridge	Lake Forest	Lake	3/3/2020	$1,190,000.00
10600068	CLSD	25460	COLUMBIA BAY	Lake Villa	Lake	3/6/2020	$1,200,000.00
10617954	CLSD	1549	Stratford	Deerfield	Lake	3/17/2020	$1,200,000.00
10472888	CLSD	185	Hazel	Highland Park	Lake	3/6/2020	$1,300,000.00
10300199	CLSD	50	Pembroke	Lake Forest	Lake	3/4/2020	$1,315,000.00
10501858	CLSD	440	ILLINOIS	Lake Forest	Lake	3/30/2020	$1,350,000.00
10339372	CLSD	170	Orchard	Lake Forest	Lake	3/31/2020	$1,579,885.00
10603213	CLSD	520	Lakeland	Lake Bluff	Lake	3/23/2020	$1,650,000.00
10161321	CLSD	95	Hestercombe	Lake Forest	Lake	3/13/2020	$1,684,443.00
10560152	CLSD	211	Maple	Lake Forest	Lake	3/12/2020	$1,875,000.00
10085907	CLSD	700	Arbor	Lake Bluff	Lake	3/9/2020	$4,200,000.00

Median Sale Price

$290,000.00

95% of Median Sale Price

$275,500.00