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**INTERGOVERNMENTAL MEMORANDUM OF UNDERSTANDING**

**AMONG**

The City of Chicago (Entitlement)  
The Chicago Housing Authority (PHA)  
The Housing Authority of Cook County (PHA)  
The County of Cook (Entitlement and HOME consortium lead)  
The Village of Arlington Heights (Entitlement and HOME consortium member)  
The City of Berwyn (Entitlement and HOME consortium member)  
The Town of Cicero (Entitlement and HOME consortium member)  
The Cicero Housing Authority (PHA)  
The City of Des Plaines (Entitlement and HOME consortium member)  
The City of Evanston (Entitlement)  
The Village of Hoffman Estates (Entitlement and HOME consortium member)  
The Maywood Housing Authority (PHA)  
The Village of Mount Prospect (Entitlement and HOME consortium member)  
The Village of Oak Lawn (Entitlement and HOME consortium member)  
The Village of Oak Park (Entitlement and HOME consortium member)  
The Oak Park Housing Authority (PHA)  
The Village of Palatine (Entitlement and HOME consortium member)  
The Park Forest Housing Authority (PHA)  
The Village of Schaumburg (Entitlement and HOME consortium member)  
The Village of Skokie (Entitlement)

**FOR**

**THE 2020-2024 ASSESSMENT OF FAIR HOUSING**

THIS AGREEMENT, entered this 1 day of November, 2017 by and among the following Participants.

The City of Chicago (Entitlement)  
The Chicago Housing Authority (PHA)  
The Housing Authority of Cook County (PHA)  
The County of Cook (Entitlement and HOME consortium lead)  
The Village of Arlington Heights (Entitlement and HOME consortium member)  
The City of Berwyn (Entitlement and HOME consortium member)  
The Town of Cicero (Entitlement and HOME consortium member)  
The Cicero Housing Authority (PHA)  
The City of Des Plaines (Entitlement and HOME consortium member)  
The City of Evanston (Entitlement)  
The Village of Hoffman Estates (Entitlement and HOME consortium member)  
The Maywood Housing Authority (PHA)  
The Village of Mount Prospect (Entitlement and HOME consortium member)  
The Village of Oak Lawn (Entitlement and HOME consortium member)  
The Village of Oak Park (Entitlement and HOME consortium member)  
The Oak Park Housing Authority (PHA)  
The Village of Palatine (Entitlement and HOME consortium member)

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The Park Forest Housing Authority (PHA)  
The Village of Schaumburg (Entitlement and HOME consortium member)  
The Village of Skokie (Entitlement)

WHEREAS, The City of Chicago is a consolidated plan jurisdiction with a program year start date of January 1, Chicago's next 5-year consolidated plan cycle will begin in 2020.

WHEREAS, the Chicago Housing Authority is a public housing authority with a fiscal year beginning date of January 1. The Chicago Housing Authority is a Moving to Work agency, with a report due to HUD annually.

WHEREAS, the Housing Authority of Cook County is a public housing authority with a fiscal year beginning date of October 1. The Housing Authority of Cook County's next 5-year PHA plan will begin in 2018.

WHEREAS, The County of Cook is a consolidated plan jurisdiction with a program year start date of October 1. The County of Cook's next 5-year consolidated plan cycle will begin in 2020.

WHEREAS, The Village of Arlington Heights is a consolidated plan jurisdiction with a program year start date of October 1. The Village of Arlington Heights's next 5-year consolidated plan cycle will begin in 2020.

WHEREAS, The City of Berwyn is a consolidated plan jurisdiction with a program year start date of October 1. The City of Berwyn's next 5-year consolidated plan cycle will begin in 2020.

WHEREAS, The Town of Cicero is a consolidated plan jurisdiction with a program year start date of October 1. The Town of Cicero's next 5-year consolidated plan cycle will begin in 2020.

WHEREAS, the Cicero Housing Authority is a public housing authority with a fiscal year beginning date of January 1. The Cicero Housing Authority's next 5-year PHA plan will begin in 2020.

WHEREAS, The City of Des Plaines is a consolidated plan jurisdiction with a program year start date of October 1. The City of Des Plaines's next 5-year consolidated plan cycle will begin in 2020.

WHEREAS, The City of Evanston is a consolidated plan jurisdiction with a program year start date of January 1. The City of Evanston's next 5-year consolidated plan cycle will begin in 2020.

WHEREAS, The Village of Hoffman Estates is a consolidated plan jurisdiction with a program year start date of October 1. The Village of Hoffman Estates' next 5-year consolidated plan cycle will begin in 2020.

WHEREAS, the Maywood Housing Authority is a public housing authority (PHA) with a fiscal year beginning date of January 1. The Maywood Housing Authority's next 5-year PHA plan will begin in \_\_\_\_\_.

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WHEREAS, The Village of Mount Prospect is a consolidated plan jurisdiction with a program year start date of October 1. The Village of Mount Prospect's next 5-year consolidated plan cycle will begin in 2020.

WHEREAS, The Village of Oak Lawn is a consolidated plan jurisdiction with a program year start date of October 1. The Village of Oak Lawn's next 5-year consolidated plan cycle will begin in 2020.

WHEREAS, The Village of Oak Park is a consolidated plan jurisdiction with a program year start date of October 1. The Village of Oak Park's next 5-year consolidated plan cycle will begin in 2020.

WHEREAS, the Oak Park Housing Authority is a public housing authority with a fiscal year beginning date of January 1. The Oak Park Housing Authority's next 5-year PHA plan will begin in 2020.

WHEREAS, The Village of Palatine is a consolidated plan jurisdiction with a program year start date of October 1. The Village of Palatine's next 5-year consolidated plan cycle will begin in 2020.

WHEREAS, the Park Forest Housing Authority is a public housing authority with a fiscal year beginning date of July 1. The Park Forest Housing Authority's next 5-year PHA plan will begin in 2020.

WHEREAS, The Village of Schaumburg is a consolidated plan jurisdiction with a program year start date of October 1. The Village of Schaumburg's next 5-year consolidated plan cycle will begin in 2020.

WHEREAS, The Village of Skokie is a consolidated plan jurisdiction with a program year start date of May 1. The Village of Skokie's next 5-year consolidated plan cycle will begin in 2020.

WHEREAS, the above Participants are subject to the affirmatively furthering fair housing requirements found at 24 CFR §§5.150 through 5.180 and required to submit an Assessment of Fair Housing (AFH).

WHEREAS, the Participants wish to collaborate to develop the AFH, in accordance with that certain Chicago-Cook County Assessment of Fair Housing Scope, attached hereto and incorporated herein by reference.

WHEREAS, the Participants wish to work with the Chicago Metropolitan Agency for Planning and its partners, the Metropolitan Planning Council and the Chicago Area Fair Housing Alliance, to produce a joint/regional AFH.

WHEREAS, the AFH may be approached more effectively and economically through the collaborative efforts of the parties.

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NOW, THEREFORE, it is agreed between the parties hereto that:

LEAD ENTITY

The County of Cook will serve as the lead entity of the collaboration and will be responsible for submitting the joint/regional AFH to HUD on behalf of all the collaborating Participants.

PROGRAM YEAR/FISCAL YEAR ALIGNMENT

Collaborating Participants have, to the extent practicable, attempted to align program and fiscal years, as applicable, in accordance with the regulations at 24 CFR part 91, for consolidated plan program participants, or 24 CFR part 903, for PHAs. Alignment of program and fiscal years is not possible, therefore the AFH will be submitted in accordance with the lead entity's consolidated plan cycle. The County of Cook's due date is January 5, 2020.

ROLES/RESPONSIBILITIES OF PARTICIPANTS

Assessment of Fair Housing

Participants will collaborate on the completion of the AFH. The responsibilities of the Participants are as follows:

1. Participants will be accountable for any applicable analysis and any applicable joint goals and priorities included in the submitted AFH. Participants will also be accountable for their individual analysis, goals and priorities to be included in the submitted AFH.
2. Each Participant commits to enter into an Intergovernmental Agreement with the Chicago Metropolitan Agency for Planning regarding payment for the development of the joint/regional AFH. Participants agree to pay invoices according to internal financial policies. Cost of the AFH has been allocated amongst each Participant as follows.

Assessment geography	Total Cost	December 2017	December 2018
City of Chicago	\$75,000	\$37,500	\$37,500
Chicago Housing Authority	\$75,000	\$37,500	\$37,500
City of Evanston	\$13,000	\$6,500	\$6,500
Village of Skokie	\$12,000	\$6,000	\$6,000
County of Cook	\$33,400	\$16,700	\$16,700
Housing Authority of Cook County	\$50,000	\$25,000	\$25,000
Village of Arlington Heights	\$1,000	\$500	\$500
City of Berwyn	\$2,500	\$1,250	\$1,250
Town of Cicero	\$3,600	\$1,800	\$1,800

City of Des Plaines	\$1,000	\$500	\$500
Village of Hoffman Estates	\$1,000	\$500	\$500
Village of Mount Prospect	\$1,000	\$500	\$500
Village of Oak Lawn	\$1,000	\$500	\$500
Village of Oak Park	\$3,500	\$1,750	\$1,750
Village of Palatine	\$1,000	\$500	\$500
Village of Schaumburg	\$1,000	\$500	\$500
Maywood Housing Authority	\$3,000	\$1,500	\$1,500
Park Forest Housing Authority	\$3,000	\$1,500	\$1,500
Oak Park Housing Authority	\$3,000	\$1,500	\$1,500
Cicero Housing Authority	\$3,000	\$1,500	\$1,500

\$287,000.00

### SPECIAL CONDITIONS

1. The entitlements and PHAs designate the County of Cook as the lead entity (LE) for the joint/regional AFH. While all entitlements and PHAs are accountable for the analysis and will sign the AFH submitted document to HUD, the County of Cook will oversee the submission of the regional AFH. The County of Cook’s next Consolidated Plan cycle will be October 1, 2020-September 30, 2025. The joint/regional AFH will be due to HUD on January 5, 2020.
2. The entitlements and PHAs intend to commit financial resources, subject to appropriations/budget, to assist in compiling the joint/regional AFH, as specified above
3. The entitlements and PHAs hereto shall comply with all federal and state laws regarding discrimination and shall prohibit unlawful discrimination on the basis of race, color, religion, national origin, sex, disability, familial status, ancestry, creed, marital status and/or sexual orientation. Each entitlement and PHA will comply with any additional local laws regarding discrimination.
4. This Agreement may not be assigned without prior written approval of the parties hereto.

### WITHDRAWAL

Any Participant may withdraw from the collaboration with 30 days’ written notice via certified mail to the other participants.

The withdrawing Participant must promptly notify HUD of its withdrawal from the collaboration.

The withdrawing Participant will be financially obligated to the Chicago Metropolitan Agency for Planning for the total cost in the table.

### SEVERABILITY

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If any provision of this Agreement is held invalid, the remainder of the Agreement shall not be affected thereby and all other parts of this Agreement shall nevertheless be in full force and effect.

SECTION HEADINGS AND SUBHEADINGS

The section headings and subheadings contained in this Agreement are included for convenience only and shall not limit or otherwise affect the terms of this Agreement.

ENTIRE AGREEMENT

This Agreement between the Participants for the submission of the 2020-2024 AFH, supersedes all prior or contemporaneous communications and proposals, whether electronic, oral, or written between the Participants with respect to this Agreement. By way of signing this Agreement, the Program Participants are bound to perform the duties and obligations within this Agreement. No amendment or modification of this Agreement shall be valid unless the same is in writing and executed by all the parties hereto, and then only to the extent set forth in said writing. Any amendment to this Agreement must be submitted to HUD.

This Agreement will remain effective until July 31, 2020 or until supplanted by a new agreement, whichever comes first.

IN WITNESS WHEREOF, the Parties have executed this contract as of the date first written above.

For City of Chicago

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Signature	Type or Print Name of Authorized Representative	Date

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Signature	Type or Print Name of Authorized Representative	Date

For Chicago Housing Authority

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Signature	Type or Print Name of Authorized Representative	Date

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For County of Cook

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For Housing Authority of Cook County

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**Chicago-Cook County Assessment of Fair Housing  
Scope  
September 2017**

In the summer of 2015, the U.S. Department of Housing and Urban Development (HUD) published a new rule on affirmatively furthering fair housing. The new rule requires entitlements and public housing authorities (PHAs) to produce an Assessment of Fair Housing (AFH). Cook County includes 21 different entitlements and housing authorities that will need to produce an AFH.

HUD encourages local entities to collaborate on regional AFH. Collaboration offers numerous potential benefits. Entitlements and PHAs can more efficiently and effectively meet federal fair housing requirements, often at a cost-savings to previous fair housing analyses. An AFH for all of Cook County allows participants to utilize the ongoing work of high-capacity civic organizations to define and assess equity related topics at a regional scale. This scope outlines the partners, roles, process, geography, and timeframe for the development of an AFH for all of Cook County.

**Timeframe**

Under the rule, the participants must choose one lead entity for the submission of the plan. That lead entity must be an entitlement or PHA. The due date for all participants will be that of the lead entity. The due date for the county-wide AFH does not change the due dates for consolidated plans or PHA five year plans. The official HUD due date for the AFH will be January 5, 2020. The project will start on November 1, 2017.

**Partners and roles**

- *Lead entity-* All entitlements and PHAs participating in this AFH must designate, through an IGA, a jurisdiction to serve as the lead entity. Beyond setting the due date for the AFH, the lead entity must also oversee the submission (including in the HUD designated system) of the AFH on behalf of all participants along with addressing follow-up inquiries about the effort. Cook County will serve as the lead entity for this project. The official HUD due date for the AFH will be January 5, 2020.
  
- *Entitlements-* Both municipal and county entitlements are partners in this project. Such participation may take many forms depending on interest and capacity. Staff members and elected officials will spend time participating in meetings, reviewing deliverables, and conducting local outreach. Moreover, entitlements will be expected to provide funding to support the project. The collaborative nature of this project is expected to reduce the cost of compliance for most entities. The following entitlements are voluntarily participating in this project: Chicago, Cook County, Arlington Heights, Berwyn, Cicero, Des Plaines, Evanston, Hoffman Estates, Mount Prospect, Oak Lawn, Oak Park, Palatine, Schaumburg, and Skokie.

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- *PHAs*- Under the rule, a PHA must also produce an AFH. Much like with entitlements, this scope envisions that PHA staff and officials will participate in meetings, review deliverables, and conduct local outreach. PHAs will be expected to provide funding to support completion of the project. This is a new cost for PHAs, as they have not conducted such fair housing planning in the past. The following PHAs are voluntarily participating in this project: Chicago Housing Authority, Housing Authority of Cook County, Cicero Housing Authority, Maywood Housing Authority, Oak Park Housing Authority, and Park Forest Housing Authority.
  - *Chicago Metropolitan Agency for Planning*- CMAP is the official regional planning organization for the northeastern Illinois counties of Cook, DuPage, Kane, Kendall, Lake, McHenry, and Will. CMAP developed and now guides implementation of the GO TO 2040 comprehensive regional plan, and also developed the region's Fair Housing and Equity Assessment (FHEA) as part of a Sustainable Communities Regional Planning grant. CMAP will provide of technical assistance to develop the AFH and oversee the participation of other civic organizations.
  - *Civic organizations*- The following civic organizations will assist entitlements and PHAs with the development of an AFH: Chicago Area Fair Housing Alliance and the Metropolitan Planning Council (MPC). These groups will provide specialized assistance on key topic areas ranging from fair housing complaints and compliance to development of new metrics and national best practices around equity issues.

### **Project Team**

The day-to-day operation and oversight of the project will be managed by a project team composed of CMAP, participating civic organizations, one Cook County representative, one City of Chicago representative, one Chicago Housing Authority representative, one Housing Authority of Cook County representative, one municipal PHA, and one municipal entitlement. The Project Team will meet regularly to discuss progress on the project, upcoming steps, and share completed work product between the parties.

### **Steering Committee**

To represent the considerations of the many parties involved in development of the AFH, a steering committee will provide feedback to the Project Team throughout the planning process. This broad group will consist of one representative from each participating entitlement or PHA. The steering committee will review all draft documents in advance of public release and/or legislative review/approval.

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## Tasks

### 1. Pre-kickoff work

Before the project formally kicks off, several steps must be completed. These activities will occur prior to the “formal” project initiation in November 2017. These tasks include the following.

- The governing body of each participating entity will need to approve a resolution expressing support for the project and authorizing participation.
- All participants must sign an agreement that explains expectations for the relationship between the participants, project management, access to resources, contribution of local funding to support the project, etc. The agreement will need to be signed before the project formally begins.
- All participants must sign individual agreements with CMAP that explain expectations for the relationship between CMAP and the various the participants, project management, access to resources, contribution of local funding to support the project, etc. The agreement will need to be signed before the project formally begins.
- CMAP will notify HUD via letter which parties are participating in the AFH and submit copies of the agreements.

### 2. Outreach

Strong public outreach that goes beyond HUD statutory requirements will be a backbone of this project. To accomplish this, outreach will take place in three distinct parts.

- Initially public outreach will occur through large activities. CMAP will use the online survey site MetroQuest to develop an English and Spanish survey that can be used throughout the County to assess the fair housing issues that are of greatest concern. Concurrent with the MetroQuest site, CMAP will work with partners to facilitate seven workshops, three in the City and four in the County. Some entitlements and PHAs will want to ensure that a workshop is being held in their community. As such, CMAP will prepare “meeting in a box” materials that project partners can use to conduct additional workshops using the same materials and format. Work in this phase will include outreach trainings for entitlements, PHAs, and service organizations to ensure that each can serve as viable partners to ensure participation from a wide array of stakeholders.
- The second phase of outreach will primarily consist of topical focus groups throughout the City and County. At the conclusion of the initial round of outreach activities, the Project Team will review who participated in the various events. Those findings will help guide the focus groups for phase two, ensuring that all are given the opportunity to participate, including the following groups highlighted by HUD. The need for outreach in languages other than English and Spanish will be considered on a case-by-case basis.
  - State or local fair housing agencies and organizations
  - Tenant organizations
  - Community-based organizations that represent protected class populations
  - Faith-based organizations

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- Public and private agencies that provide social services
  - Philanthropic organizations
  - Resident Advisory boards for participating PHAs
  - State and local universities
  - Disability advocacy groups
  - Public, private, and non-profit housing providers
  - Realtors
  - Property management companies
  - Lenders
  - Ex-offenders/criminal justice groups
  - Continua of Care
  - Human Rights Commissions
  - Private developers

As in phase one, CMAP will prepare “meeting in a box” materials that project partners can use to conduct focus groups using the same materials and format. Users of the “meeting in a box” materials will be responsible for timely reporting of meeting outcomes for integration into the larger effort.

- The final phase of public outreach would occur as the plan is finalized and approved. Seven open houses would be held, three in the City and four in the County, for parties to review and comment on the draft plan. All of these open houses would occur during a 30 day public comment period. After comments received during the open houses and the 30 day public comment period are integrated into the document, each entitlement and PHA would need to proceed with local approval, which would need to include a formal public hearing.

Beyond the specific outreach tasks identified above, CMAP and other civic partners on this project are always conducting outreach in the region for various projects and it is assumed that outreach from those activities would also be brought to bear on this project. In particular, CMAP is in the process of creating ON TO 2050, the region’s next comprehensive plan. Topics being researched as part of ON TO 2050 include housing choice, inclusive growth, resilience, and disinvested areas. Findings from ON TO 2050 will be utilized in AFH development.

CMAP will create and host a dedicated project webpage containing information on the planning process and key deliverables. Each PHA and entitlement will need to include a link from their own website to the CMAP project webpage. Materials posted on the webpage may include project announcements, upcoming meeting dates, meeting materials, draft documents for review, online surveys, etc. CMAP will be responsible for posting the material and keeping the page up-to-date.

All public outreach collected during the process will be summarized in an outreach document that will be an appendix to the plan. This will include a description of outreach activities; approach to reaching various populations, including underrepresented populations; a list of people/organizations who participated during the planning process; a summary of the feedback received throughout the process; and a log of all comments received during the open houses

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and public comment period, including a summary of any comments, views, and recommendations not accepted by entitlements and PHAs and the reasons for non-acceptance.

### **3. Existing conditions analysis**

An important interim product is the “existing conditions report.” This document will discuss the existing conditions of fair housing, including patterns of integration and segregation; racially or ethnically concentrated areas of poverty; disparities in access to transit, jobs, and economic opportunity; and disproportionate housing needs. The project team will prepare the existing conditions analysis, with data support and review from the entitlements and PHAs.

Entitlements and PHAs accountable for their individual analysis along with that of a joint regional analysis. Participating in a county-wide AFH does not relieve each entitlement or PHAs of its obligation to analyze and address local and regional fair housing issues and contributing factors that affect fair housing choice.

Given this, the existing conditions report will include one regional analysis of fair housing conditions in the region and local assessments for individual participants. See the [Kansas City Metropolitan Area AFH](#) as a potential model. The analysis will include the following:

- A demographic summary that includes an analysis on patterns of segregation and integration locally and regionally and factors that that significantly impact segregation/integration.
- Identification of Racially or Ethnically Concentrated Areas of Poverty (R/ECAPs), disparities in access to opportunity, and disproportionate housing needs, and factors that significantly impact the presence of these issues.
- An analysis of publicly supported housing in terms of location, demographics, occupancy, and access to opportunity, along with the identification of factors that significantly impact the existing conditions.
- An analysis of the presence, location, and access to opportunity of persons with disability, along with the identification of factors that significantly impact the existing conditions.
- An assessment of the current fair housing ecosystem, including the capacity of individual jurisdictions to conduct fair housing outreach or enforcement, whether themselves or through a local partner, along with the identification of factors that significantly impact the existing conditions.

Local data will be used to supplement HUD provided data. The Lead Entity will be responsible for helping CMAP and other consultants access the HUD provided data. Supplemental data will be identified in many ways, including through Task 2. The Project Team also anticipates using data developed in ongoing planning activities to inform the existing conditions analysis, including ON TO 2050, MPC’s Cost of Segregation project, and the FHEA.



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#### **4. Plan development**

##### *Task 4a: Key recommendations memo*

Before the plan is drafted, the Project Team will prepare a memo describing the key recommendations that are expected to be contained in the plan. The memo will include both fair housing goals and priorities applicable to all participants and local fair housing goals and priorities applicable to each individual participant. The purpose of the memo is to provide each participant with a summary of key recommendations before much time is spent writing them in detail; if there are significant problems with any elements of the report, they should surface at this point. Individual memos will be prepared for each participant. At least one Steering Committee meeting is envisioned to discuss the county-wide recommendations. Each participant will be responsible for determining the preferred local process to vet the memo.

##### *Task 4b: Draft plan*

The findings from community outreach and the existing conditions report along with the recommendations memos will be synthesized into a draft AFH. The AFH must be submitted via the online HUD assessment tool. CMAP and the Lead Entity will work closely with the rest of the Project Team create a draft AFH that follows the proscribed HUD framework. The Steering Committee will be responsible for reviewing and providing feedback on the drafts of the AFH during this phase of the project.

##### *Task 4c: Graphic Design*

To supplement the official HUD version of the plan that will be submitted online, CMAP will take contents of the draft plan to create one easy-to-read and graphically rich summary. The graphic document will cover public involvement, key findings, and local and county-wide recommendations.

#### **5. Plan approval**

##### *Task 5a: Open houses and comment period*

As noted under Task 2, the Project Team will hold seven open houses, three in the City and four in the County, for parties to review and comment on the draft plan. All of these open houses would occur during a 30 day public comment period. The Project Team will finalize the plan after the close of the comment period.

##### *Task 5b: Public hearings*

Public hearings will be held on the finalized plan as needed in each entitlement and PHA. Each PHA and entitlement is responsible for all noticing related to the public hearing. The Project Team will provide support as necessary.

##### *Task 5c: Approval*

Each participating PHA and entitlement will formally approve the AFH. Each PHA and entitlement is responsible for all noticing related to the approval meeting. The Project Team will provide support as necessary.

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*Task 5d: HUD submission and approval*

After the plan has been approved by all parties, the AFH must be submitted to HUD. The Lead Entity will be responsible for submission to HUD, including the uploading of all materials in the HUD submission system.

HUD will either approve the AFH or provide a response letter noting required changes within 60 days of submission. HUD may accept a regional AFH for some participants, but not accept the regional AFH for others. The Project Team will work with any participants for whom the regional AFH was not accepted by HUD to address any changes and resubmit within the designated response period.

