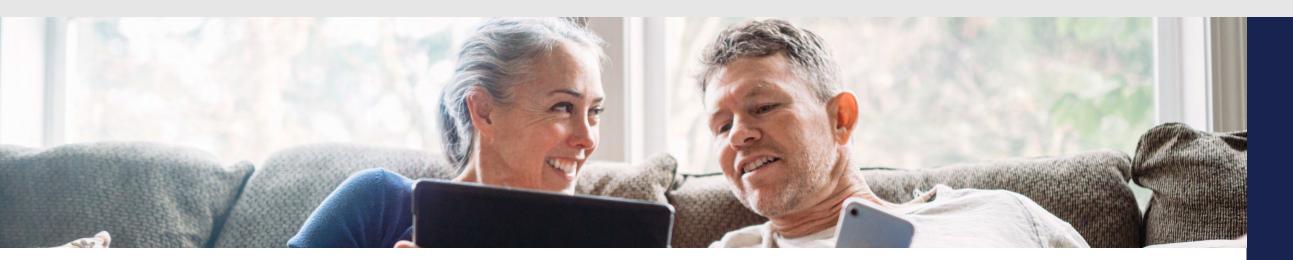




2025 Targeted Community Lending Plan

Table of Contents

Mission	District Population, Housing and Economic Trends	Needs Assessment	Strategy and Goals



I. Mission

Pursuant to 12 C.F.R. Parts 1290.6 and 1291.13, Federal Home Loan Bank of Chicago ("FHLBank Chicago") presents its 2025 Targeted Community Lending Plan (TCLP). The TCLP documents market dynamics, as well as housing and economic development needs, within FHLBank Chicago's district of Illinois and Wisconsin (the "district"). Specifically, the TCLP:

- Reflects timely market research on trends in the district;
- Describes how FHLBank Chicago will address identified credit needs and market opportunities in the district with targeted community investment, including lending;
- Establishes targeted community investment performance goals;
- Identifies and assesses significant affordable housing and economic development needs in the district that will be addressed through FHLBank Chicago programming; and
- Specifies, from among the identified needs, the particular affordable housing needs that FHLBank Chicago will address via any Targeted Funds under its Affordable Housing Program.

The TCLP is developed in consultation with FHLBank Chicago's Community Investment Advisory Council (CIAC), shareholders ("members"), housing associates, public and private economic development organizations, and other stakeholders and community partners throughout the district. FHLBank Chicago's 2025 TCLP comprises four sections: Mission; District Population, Housing and Economic Trends; Needs Assessment; and Strategy and Goals.

- **4** Our Mission
- **5** Housing Leadership

Our Mission

FHLBank Chicago is a member-focused, self-capitalizing cooperative committed to providing reliable short-term liquidity and long-term funding to support housing finance and community investment to our members, which comprise more than 650 financial institutions chartered in our district of Illinois and Wisconsin, and their communities.

Since 1989, FHLBank Chicago has contributed at least 10% of our net earnings to the Affordable Housing Program (AHP) to support housing opportunities for more than 80,000 households, positioning us as one of the largest privately capitalized contributors to affordable housing efforts in our district.

In addition to statutorily required contributions to the AHP, FHLBank Chicago voluntarily contributes additional funding to programs we have developed to address critical affordable housing and community development needs unmet by statutory programs. In 2024, FHLBank Chicago committed over \$180 million in funding for affordable housing and community development programs via statutory and voluntary programs.

Our capacity to support affordable housing and community development activities derives from the success of our core member business lines: providing members with liquidity and funding in the form of advances (or loans) and letters of credit, and providing a secondary market alternative for members' mortgage assets via our Mortgage Partnership Finance® Program. Delivering on our liquidity mission drives our ability to invest in our members' communities via grants, discounted advances and other products and programs that support affordable housing and community development.

Mission, Vision and Values

Our Mission

To partner with our members in Illinois and Wisconsin to provide them competitively priced funding, a reasonable return on their investment in the Bank, and support for their community investment activities.

Our Vision

As a reliable source of liquidity and funding, we strengthen our district's members and empower them to enhance access to quality, affordable housing. We impact every community. Our goal is to ensure everyone has access to quality, affordable housing within the next decade.

Our Values



Bold



Connected



Committed



Trusted

Housing Leadership

Championing access to affordable housing and economic development is at the core of FHLBank Chicago's housing leadership strategy. We do this in three primary ways:

- Amplifying our members' community investment activities with innovative products and programs that address unmet community needs and deliver impact throughout the district;
- Building community throughout the district by supporting activities that facilitate economic opportunities for residents and communities; and
- Providing thought leadership and serving as a knowledge resource and convener of industry partners and members to promote innovation and problem-solving with respect to the district's housing and economic development needs.

FHLBank Chicago offers a variety of dedicated products to expand access to quality affordable housing and economic opportunities for low- and moderate-income households throughout Illinois and Wisconsin, in partnership with our members. Collectively, these products are referred to as Mission Programs. In addition, FHLBank Chicago supports affordable housing and economic development through mission-oriented initiatives within its other core business lines. Mission Programs and other mission-oriented business

initiatives seek to achieve the following community investment objectives:

- Expand the supply of affordable housing in the district:
- Improve housing affordability and homeownership sustainability;
- Expand access to capital for housing and economic development;
- Catalyze economic opportunities for residents and communities: and
- Build community capacity for affordable housing and economic development.

In pursuing these objectives, FHLBank Chicago responds to the critical housing and community development needs in our district, facilitates impactful opportunities for our members to address those needs, champions innovation, and delivers on our commitment to housing leadership.





II. District Population, Housing and Economic Trends

FHLBank Chicago monitors market conditions in the district and identifies unmet needs and opportunities to inform FHLBank Chicago's housing leadership strategy, including our Mission Programs and other mission-oriented initiatives. District population, housing, and economic trends are summarized in this section.

7 POPULATION TRENDS

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 POPULATION, HOUSING,
 AND ECONOMIC TRENDS

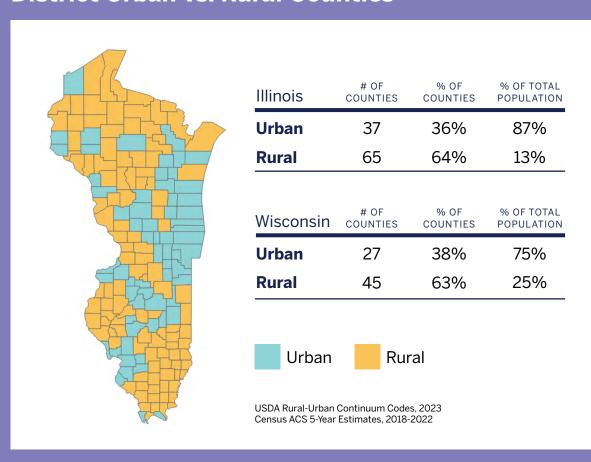
Population Overview

The district's population comprises over 18 million residents.¹ Though the district's population resides disproportionately in urban areas, the majority of counties in Illinois and Wisconsin are considered rural. While Illinois has sustained population loss in both urban and rural areas over the past decade, Wisconsin has experienced some

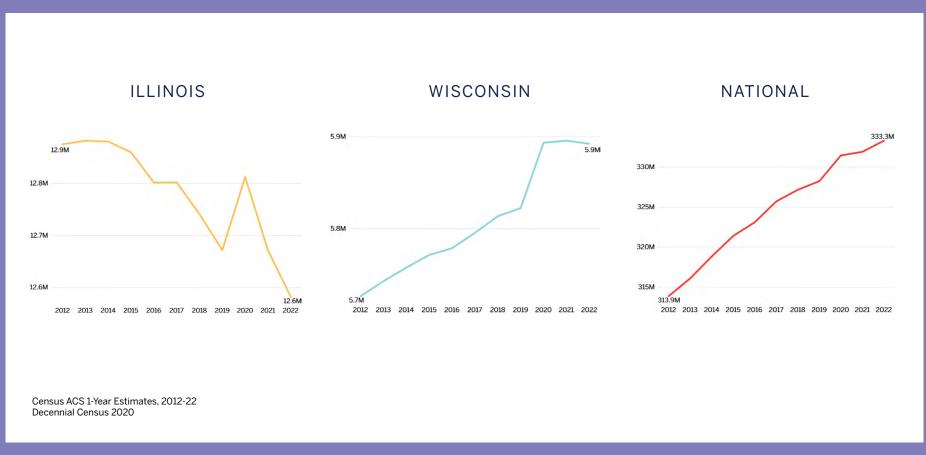
population growth, especially in rural counties.² The Chicago Metro area's population includes over 75% of the Illinois state population, while the Milwaukee Metro area's population comprises less than 27% of the Wisconsin state population.³

¹2023 Census Population and Housing Unit Estimates Tables ²Census American Community Survey 5-Year estimates, 2013-2017 and 2018-2022 ³Census American Community Survey 1-Year estimates, 2022

District Urban vs. Rural Counties



Population Change (2012-2022)

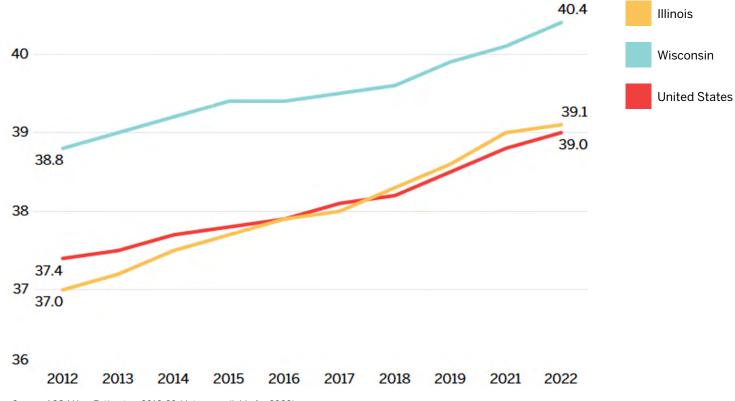


Age

Our district is aging, and shifting age demographics suggest a growing mismatch between the existing affordable housing supply and the population's housing needs in the years to come.⁴ Our district is likely to see increased demand for affordable housing options and supports that allow people to age in place, such as downsized homes, age-restricted multifamily developments, and home rehabilitation programs to maintain aging inventory and enable accessibility modifications.

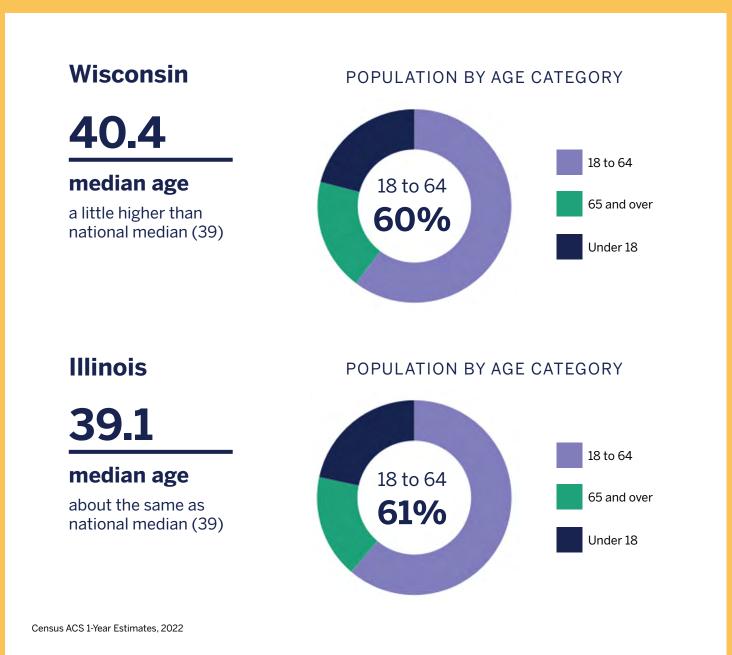
⁴Census ACS 1-Year Estimates, 2012-22

Median Age Trends (2012-2022)



Census ACS 1-Year Estimates, 2012-22 (data unavailable for 2020)

Median Age (2022)

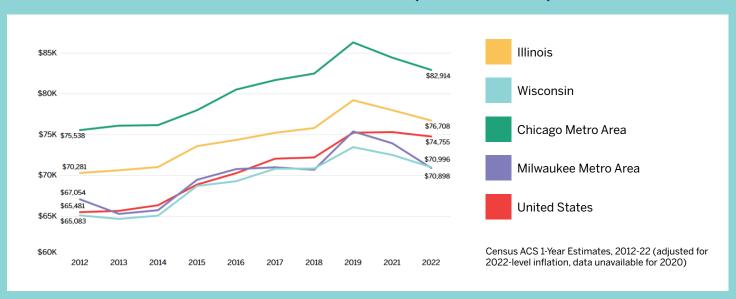


Median Household Income

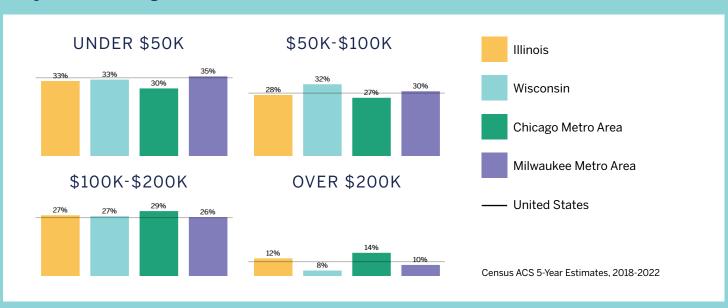
Median household income in the district has declined over the past five years. Further, wages have not kept pace with inflation or home prices, and housing-related expenses have significantly increased.⁵ As a result, the gap between income and expenses has widened, and households face escalating affordability challenges related to essential needs, such as shelter and food. As these dynamics escalate, the district will see increasing need for affordability supports for low- and moderate-income households.

The distribution of district population across the income spectrum mirrors national trends.⁶ The largest proportion (33%) of the district's population is concentrated among households earning annual income less than \$50,000.⁷ Moderate-income households, which may comprise the majority of a community's workforce, are the next largest income bracket in our district. Similar to lower income households, moderate income households often find it difficult to afford essential expenses, build wealth, and acquire assets such as housing. Moreover, moderate-income households may not qualify for public or private subsidy programs, suggesting the need for additional affordability supports specifically targeting this market segment.

Median Household Income Trends (2012-2022)



Population by Household Income



⁵Census American Community Survey 1-Year estimates, 2017-2022

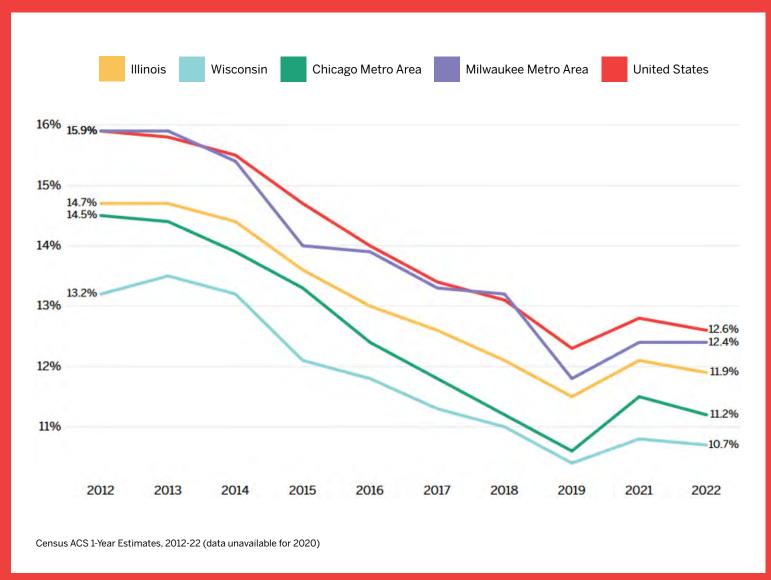
⁶Census ACS 1-Year Estimates, 2012-22

⁷Census ACS 5-Year Estimates, 2018-2022

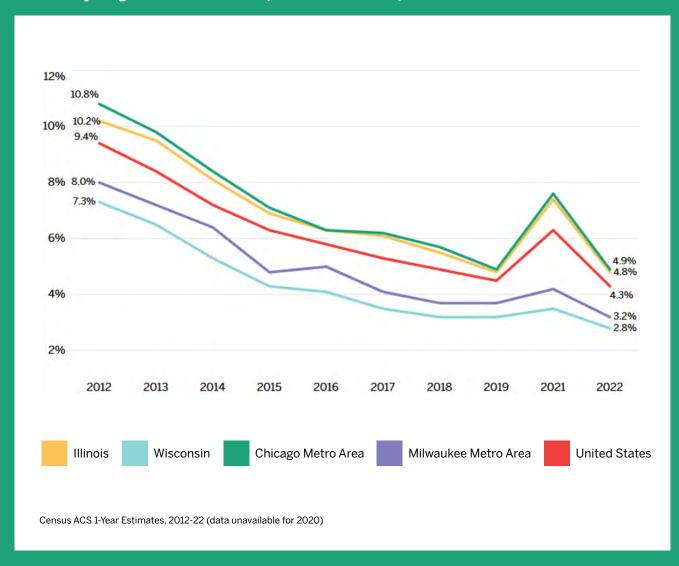
Poverty and Unemployment

Unemployment rates both in the district and nationally declined from 2011 through 2022, with the exception of a 2020-2021 spike during the COVID-19 pandemic.⁸ Unemployment in Illinois has been consistently higher than the national rate, while in Wisconsin it has been consistently lower. Rural counties in Illinois and Wisconsin have both higher poverty and unemployment rates than urban counties.⁹

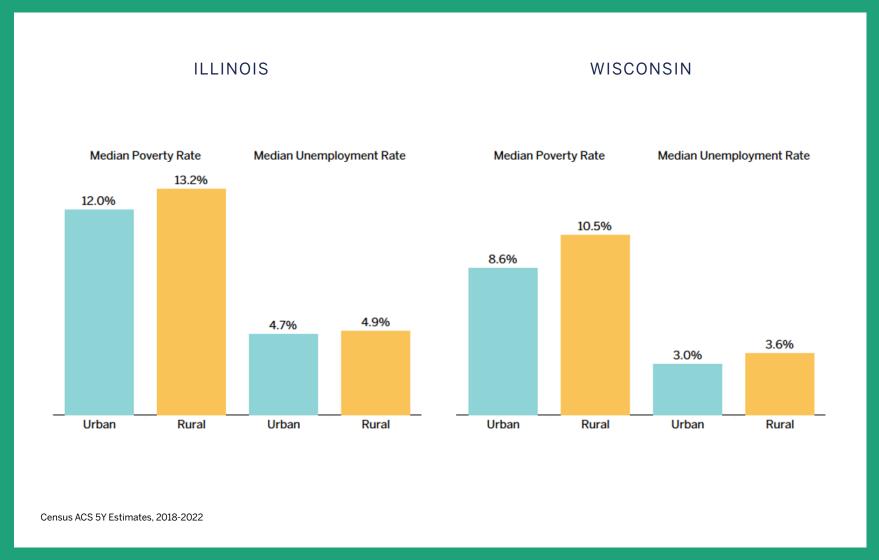
Poverty Rate (2012-2022)



Unemployment Rate (2012-2022)



Urban vs. Rural Poverty and Unemployment Rates



Housing Trends

Housing Market Overview

Illinois and Wisconsin face historically low levels of housing inventory which, coupled with strong consumer demand, drive the cost of housing upward. In an environment of declining household income, these dynamics coalesce to create a crisis of housing access and affordability across the spectrum of all affordable housing types.

To understand the full impact of the housing crisis and identify possible solutions, it is helpful to consider affordable housing as a continuum of housing types serving the varied needs of the population. Housing types along the continuum may range from emergency shelters, to transitional or supportive housing, to subsidized or unsubsidized rental housing, to market rate homes. While there is no absolute path from step to step, households' successful movement along the continuum tends to occur on a trajectory from more supportive/subsidized options toward market rate opportunities.

The affordable housing continuum highlights the interconnectivity between housing types. If there is a supply or affordability bottleneck at one step on the continuum, households have difficultly progressing to the next step, limiting opportunities to build self-sufficiency and wealth in the process. For example, if owner-occupied homes are not available or affordable, renters will remain renters, creating a demand bottleneck for both rental and owner-occupied housing. This bottleneck further fuels supply and affordability challenges for both types of housing stock, and also impedes access to the benefits and opportunities that come with homeownership.

This section of the TCLP explores market trends across the housing continuum, including homelessness, rental housing, and owner-occupied housing.



Housing Trends

Homelessness

Homelessness is on the rise, both in our district and nationally. In both Illinois and Wisconsin, the total homeless population has been increasing in recent years, after reaching a low point in 2021.10 In 2023, the total homeless populations of Illinois and Wisconsin were 11,947 and 4,861 individuals, respectively. 11 While some homeless individuals and families seek emergency or transitional shelter, others remain unsheltered. In 2023, more than 50% of homeless individuals nationwide were unsheltered. 12 Homelessness trends support the need for emergency shelters and transitional housing, particularly for those with heightened barriers to housing, such as chronically homeless individuals and veterans, who respectively experienced 12% and 7% year-over-year increases in homelessness nationally in 2023, well above the increase in the national rate of overall homelessness. during that time.¹³

Homelessness is fueled in part by a shortage of affordable housing options for individuals in the lowest income brackets, resulting in severe housing cost burden that puts quality affordable housing out of reach. In 2023, 74 and 72% of extremely low-income renter households (i.e., those with incomes at or below either the federal poverty guideline or 30% of the area median income (AMI), whichever is higher) in Illinois

and Wisconsin, respectively, paid more than 50% of their income toward rent. ¹⁴ For every 100 extremely low-income renter households in Illinois and Wisconsin, just 36 and 34 affordable rental homes, respectively, are available. Compounding this dynamic, 49% of extremely low-income renters nationwide are seniors or have disabilities. ¹⁵ Affordability challenges facing the most economically vulnerable renters directly contribute to homelessness trends in the district and nationwide.

¹⁰HUD, 2013-2022; Census ACS 1-Year Estimates, 2013-2022; Decennial Census 2020.

^{11.12} Soucy, Daniel, et al. National Alliance to End Homelessness, 2024, State of Homelessness: 2024 Edition.

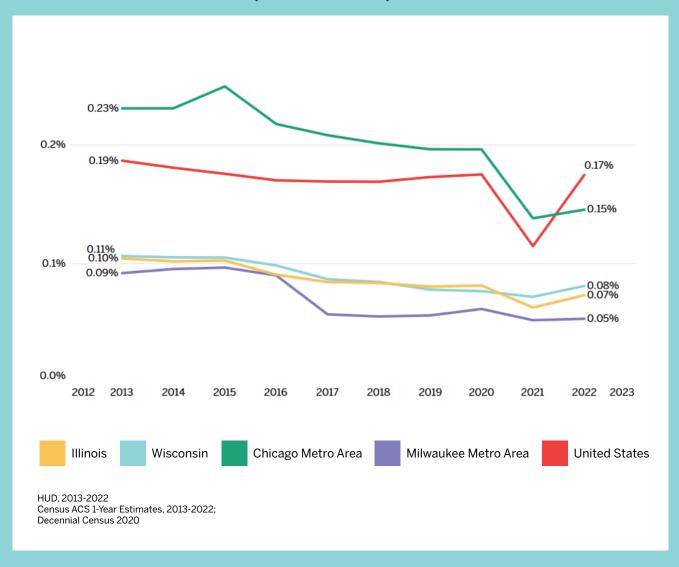
¹³HUD, 2023, Annual Homelessness Assessment Report (AHAR) to Congress, HUD.

¹⁴National Low Income Housing Coalition, 2024, The Gap: A Shortage of Affordable Homes

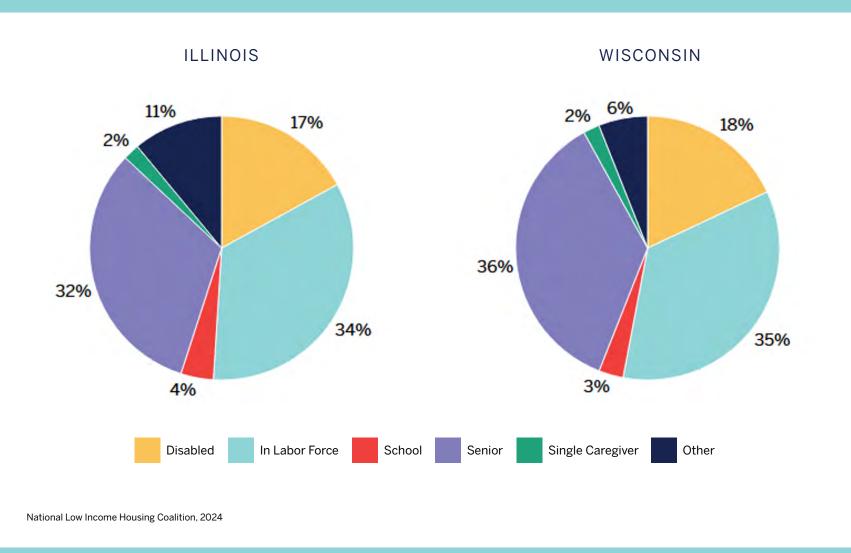
¹⁵Housing Needs by State, National Low Income Housing Coalition, 2024

Homelessness

Homelessness Rate (2013-2022)



Snapshot of Extremely Low-Income Renters



Housing Trends

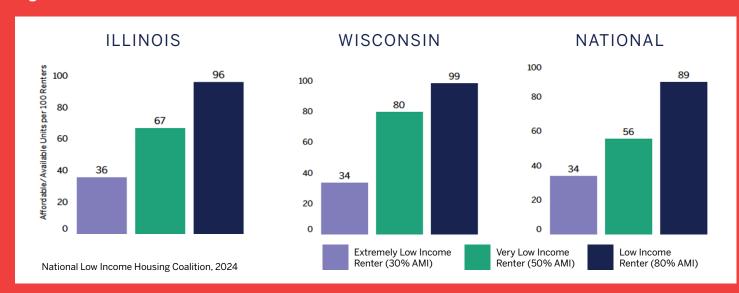
Rental Housing Market

Rental housing affordability is the key to housing stability for many low- and moderate-income households. Without affordable rental options, households in lower income brackets are more vulnerable to disruptions in their economic stability, which places them at heightened risk of homelessness. Of course, housing affordability and housing supply go hand in hand, and the demand for affordable, available rental housing units far exceeds supply, particularly for extremely-, very low-, and low-income renters. Nationwide, there is shortage of 7.3 million affordable, available rental homes to serve the lowest-income renters (i.e., those with incomes at or below either the federal poverty guideline or 30% of the area median income (AMI), whichever is higher).

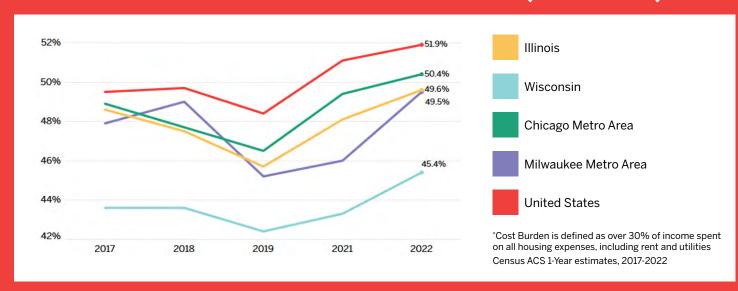
In a supply-constrained environment and with median income falling, the share of cost-burdened renters in the district and nationally has significantly increased since 2019, with nearly half of all renters in the district paying more than 30% of income toward rent. Not surprisingly, housing cost burden is not limited to extremely low-income renters. In fact, renter cost burden is increasingly impacting households in higher income segments. Nationally, moderate-income households (earning between \$45,000 and \$74,999) represented the fastest growing segment of total cost burdened renters between 2019 and 2022, comprising 41%.¹⁸

Nationwide, housing cost increases for renters have outpaced income growth over the last two decades.¹⁹ Rising rents have been fueled not only by low housing supply, including owner-occupied supply that prevents renters from moving forward on the housing continuum, but also by increases in operating expenses for rental properties, such as rising insurance premiums.

Shortage of Available, Affordable Rental Housing Units by Income



Percent of Renters Who are Cost Burdened (2017-2022)*



^{16,17}National Low Income Housing Coalition, 2024, The Gap: A Shortage of Affordable Homes.

^{18,19} Joint Center for Housing Studies, Harvard University, 2024, 2024 State of the Nation's Housing.

Housing Trends

Owner-Occupied Housing Market

Homeownership provides a path to economic security and wealth-building for many families. The benefits of homeownership extend to communities as well, facilitating local economic development, community engagement, and improved health and safety outcomes, among other benefits. While homeownership rates in Illinois and Wisconsin exceed the national rate, homeownership remains out of reach for many low- and moderate-income households in the district.²⁰

Despite the well-documented benefits of homeownership, it is increasingly unattainable for many households in our district given tight housing supply and rising home prices. Nationwide, home prices are up 47% since 2020 and 115% since 2010.²¹ While homeownership in Illinois and Wisconsin is more affordable than the national average, prices have grown to many multiples of median household income. Home prices are 3.6 and 3.3 times the median household income in Illinois and Wisconsin, respectively, a factor that continues to trend upward.²²

The high cost of homeownership is fueled in large part by the shortage of affordable, available homes on the market.²³ Put simply, affordable for-sale housing units are in short supply; the inventory of available homes has declined, as evidenced by fewer listings, building permits issued, and number of days available

homes are on the market. Nationwide, inventory is down in 94 of the 100 largest metro markets.²⁴ There is an estimated shortage of at least 3.8 million units nationwide, with the Chicago Metro area among the most supply-constrained areas.²⁵

The current housing shortage can be traced to the overall decline of single-family homes over several decades and, in particular, the marked underbuilding of entry-level homes, where most demand exists. 26 Reasons for the lack of new development to meet the demand for affordable units include: steeply increasing raw material costs, lack of available construction labor, land use regulations, zoning restrictions limiting ability to meet demand, lack of developers, and lack of land to develop. These factors drive up development costs, and the economics of new home construction, and specifically affordable, entry-level homes, often simply do not pencil out.

The combination of rising home prices, declining entry-level inventory, and declining median household income, in addition to rising interest rates and insurance premiums, is locking an increasing number of would-be homebuyers out of the market, particularly those in low- and moderate-income brackets. This impedes access to the wealth-building opportunities of homeownership for many households and heightens

strain on the rental market, increasing rents while at the same time preventing households from moving forward along the continuum to homeownership.

Multi-pronged solutions are needed to facilitate access to affordable homeownership – strategies that both increase owner-occupied housing inventory and bridge the widening homeownership affordability gap for lowand moderate-income households. For homeownership to be a viable option for low- and moderate-income households in the district, current affordability and supply gaps must be bridged.

²⁰Census ACS 1-Year Estimates, 2012-2022; Decennial Census 2020.

^{21,24} Joint Center for Housing Studies, Harvard University, 2024, 2024 State of the Nation's Housing.

²²Census ACS 1-Year Estimates, 2017-2022 (Data unavailable for 2020)

²³Realtor.com, 2016-2024

^{25, 26}Khater, Sam, et al. Freddie Mac, 2021, Housing Supply: A Growing Deficit.

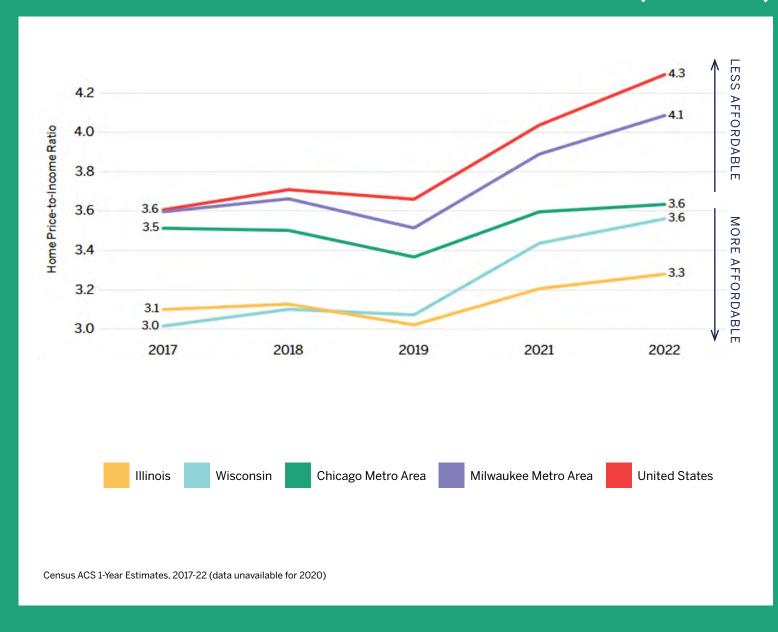
Owner-Occupied Housing Market

Homeownership Rate (2012-2022)

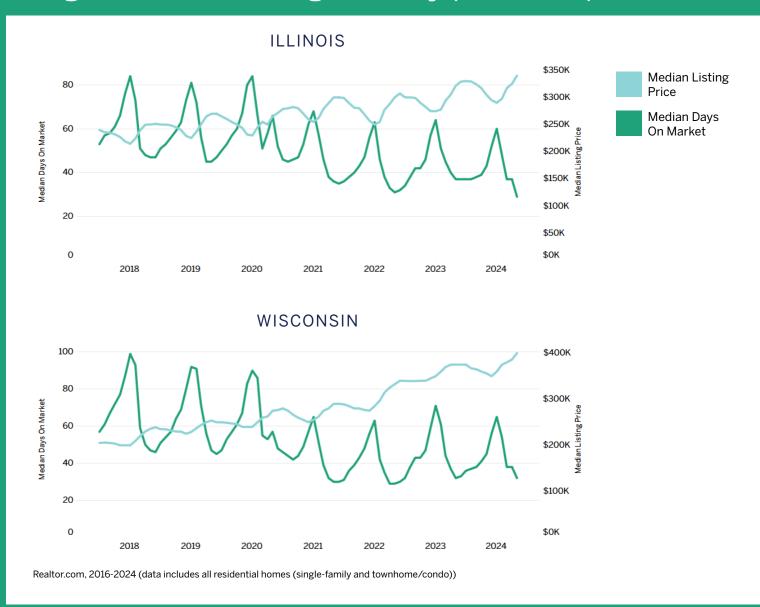


Owner-Occupied Housing Market

Median Home Sale Price to Median Household Income (2017-2022)

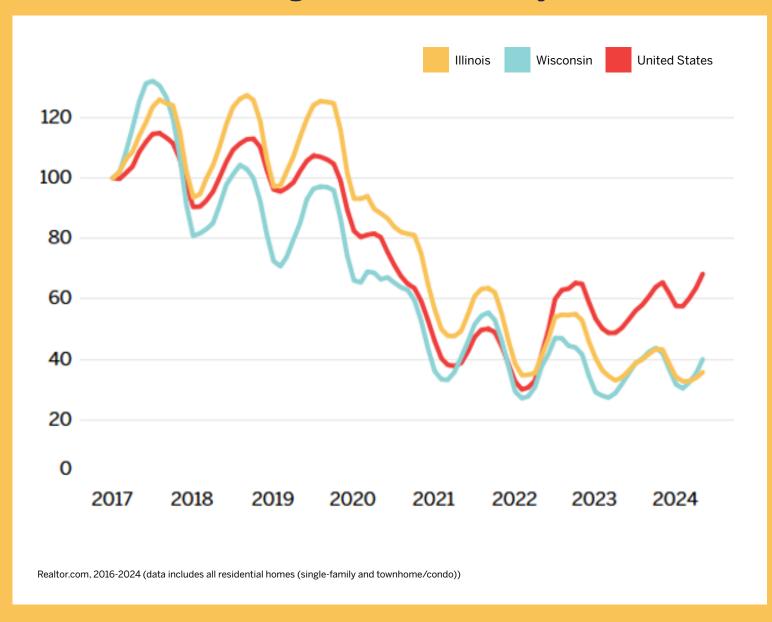


Rising Home Prices, Falling Inventory (2016-2024)

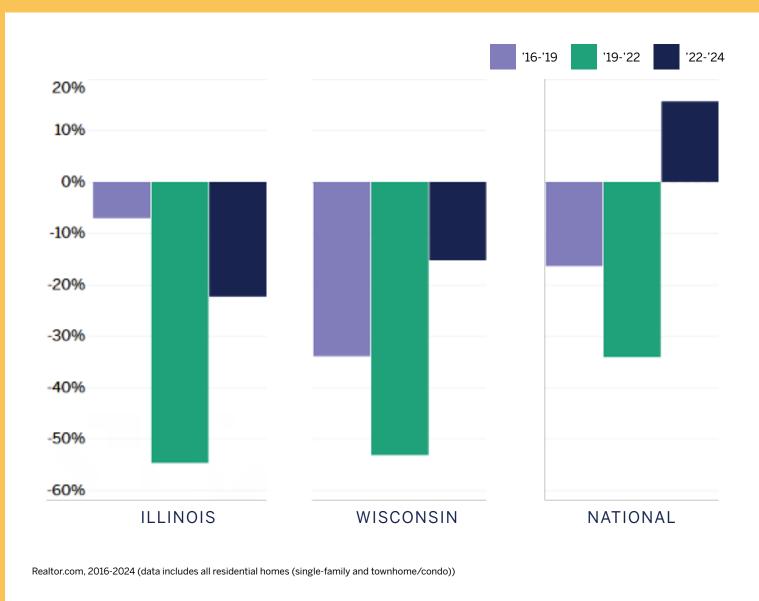


Owner-Occupied Housing Market

Number of Active Listings, indexed to January 2017



Percent Change in Active Housing Listings



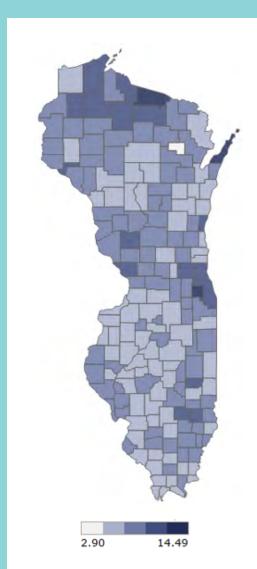
Economic Trends

Business Environment

The health of the small business sector is an important indicator of the health of local economies. Small businesses are critical to communities as they create jobs, boost economic growth, drive innovation, and generate wealth for business owners and communities alike. As of 2020, there were over 1.7 million small businesses in Illinois and Wisconsin, with over 1.2 million and 450,000 in Illinois and Wisconsin, respectively. In 2021, the percentage of jobs at small businesses in Illinois and Wisconsin constituted 44% and 49%, respectively, of total jobs within those states. Small businesses in the district contribute to the health and wealth of local economies. However, the number of businesses per capita in the district varies widely by county, pointing to geographic disparities in small business activity.

Businesses require capital to operate and grow. Securing capital can be especially difficult for small and newer firms as they often lack the experience and established credit history that many financial institutions require of borrowers. A 2023 U.S. Chamber of Commerce survey of small businesses found that internal capacity and insufficient revenue or assets to qualify for a loan were their most significant barriers to securing capital for businesses. Many small business owners instead raise capital outside of the financial system, leveraging personal savings and credit cards to finance their business growth. Interestingly, according to small business owners, local banks and credit unions rank first among financial institutions in providing capital to small businesses.

Small Businesses* per 100 Residents Percent of Jobs at Small Businesses



WISCONSIN

457,769 small businesses

7.77 small businesses per 100 residents

48.7% of jobs at small businesses

ILLINOIS

1,257,064 small businesses

9.99 small businesses per 100 residents

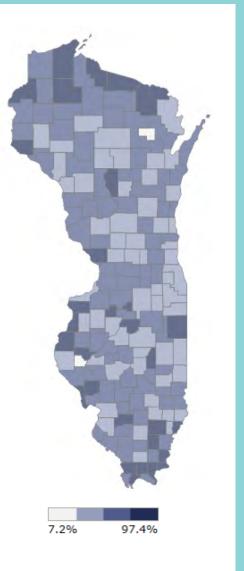
44.1% of jobs at small businesses

UNITED STATES

33,163,349 small businesses

9.98 small businesses per 100 residents

45.9% of jobs at small businesses



^{*}Small business defined as firms <500 employees Statistics of US Businesses (SUSB) Annual Data Tables, 2020; Nonemployer Statistics (NES), 2020; Census ACS 1-Year, 2022

^{27,28,29}Statistics of US Businesses (SUSB) Annual Data Tables, 2020; Nonemployer Statistics (NES), 2020; Census ACS 1-Year, 2022 ³⁰Swanek, Thaddeus. U.S. Chamber of Commerce, 2023, New Survey Shows Small Businesses' Growing Concern about Raising Capital

Economic Trends

Financial Institutions and Access to Capital

Financial institutions, including FHLBank members, play a critical role in affordable housing and community development finance, supporting homebuyers, housing developers, small businesses, and community facilities via community lending activities. The types and numbers of financial institutions and branches in our district influence overall access to capital for these activities. Our district has a relatively large concentration of smaller sized banks than the nation overall, as indicated by the presence of relatively more depositories per capita, relatively lower average total assets per financial institution, and a relatively lower share of credit unions.³¹

Furthermore, the district has more financial institution branches per capita and fewer unbanked people than the national average. In Illinois and Wisconsin, 4.4% and 2.1% of their respective state populations are unbanked, compared to 4.5% nationwide.³² A relatively strong, local presence by institutions provides residents with wider access to financial products and services. Institutions with a local presence also tend to be invested in community life, engaging in local projects, supporting local nonprofits and CDFIs, and participating in other community-building activities. In this way, the presence of financial institutions in a community contributes to its broader stability.

Despite the important role of financial institutions in local community development, residents of underserved areas (specifically, low-income census tracts) have relatively less access to financial products than the population overall due to the relatively lower density of depositories in those communities.³³ This means areas with potentially heightened need for affordable housing and community development solutions may have less local support for them.

There are over 130 institutions designated as a minority depository institution (MDI), low-income credit union, community development financial institution (CDFI), and/or Native CDFIs throughout our district providing capital and other financial services in the communities they serve.³⁴ These community-based financial institutions are critical drivers of affordable housing and community development activity, often supporting needs unmet by traditional banks.

Depositories by Asset Size

ASSET	DEPOSITORIES					
BUCKET	ILLINOIS		WISCONSIN		NATIONAL	
<\$100M	236	(41.1%)	76	(27.9%)	2,557	(37.9%)
\$100M-\$250M	118	(20.6%)	57	(21%)	1,835	(19.6%)
\$250M-\$1B	149	(26%)	99	(36.4%)	2,442	(26%)
\$1B-\$10B	64	(11.1%)	39	(14.3%)	1,320	(14.1%)
>\$10B	7	(1.2%)	1	(0.4%)	223	(2.4%)

SNL, 2024

The Important Role of CDFIs

CDFIs are private-sector, financial intermediaries with a primary mission of community development. They do this through:

- Meet financial services needs in historically underserved communities, positioning them as a critical resource for pandemic recovery
- Finance small businesses, community institutions, and housing development in markets, with the goal of providing affordable, consumer-friendly lending options to economically disadvantaged communities.
- Include community development banks, loan funds, credit unions, corporations, and venture capital funds.
- Attract public and private capital sources (e.g., U.S. Department of the Treasury's CDFI Fund, conventional financial institutions, foundations, corporations, individuals, and customer deposits for depository CDFIs).

CDFIs play a critical role in local markets districtwide, serving the housing and economic development needs of underserved communities throughout the district.

³¹SNL, FHFA, 2024; Census ACS 5-Year estimates, 2018-2022; Federal Reserve (2021)

³²Federal Reserve (2021)

³³SNL, FHFA, 2024; Census ACS 5-Year estimates, 2018-2022

³⁴SNL, 2024; See 12 U.S.C. 1463 statutory note, and as implemented by certain prudential regulators.

Native Population, Housing and Economic Trends

The district's Native communities experience unique market and community development dynamics.³⁵ This snapshot of districtwide Native population and market trends informs FHLBank Chicago's development and refinement of Mission Programs and mission-oriented initiatives to meet the needs of Native communities.

Both Illinois and Wisconsin are home to Native American populations, with over 157,000 and 101,000 American Indian or Alaskan Native individuals residing in each state, respectively, as of 2022. There are 12 federally recognized Native Nations in FHLBank Chicago's district, with 11 located in Wisconsin on tribal land encompassing over 500,000 acres in 16 counties, and one located in Illinois encompassing 1,280 acres.

Overall, 1.2% of Illinois' population identifies as American Indian and/or Alaskan Native, compared to 1.7% in Wisconsin. Interestingly, the vast majority of the Native residents of the district reside in urban areas, despite the rural classification for most tribal areas.

The Native American population in the district experiences disproportionately high poverty and unemployment as compared to the district's broader population, with poverty and unemployment higher still for the Native population living on tribal land. Likewise, Native households experience lower median

household income, lower educational attainment, and greater housing overcrowding than the district's overall population. Although collectively the district's Native residents living on tribal land have a lower or similar level of housing cost burden as the district's broader population, residents of some tribal areas experience disproportionately greater housing cost burden.

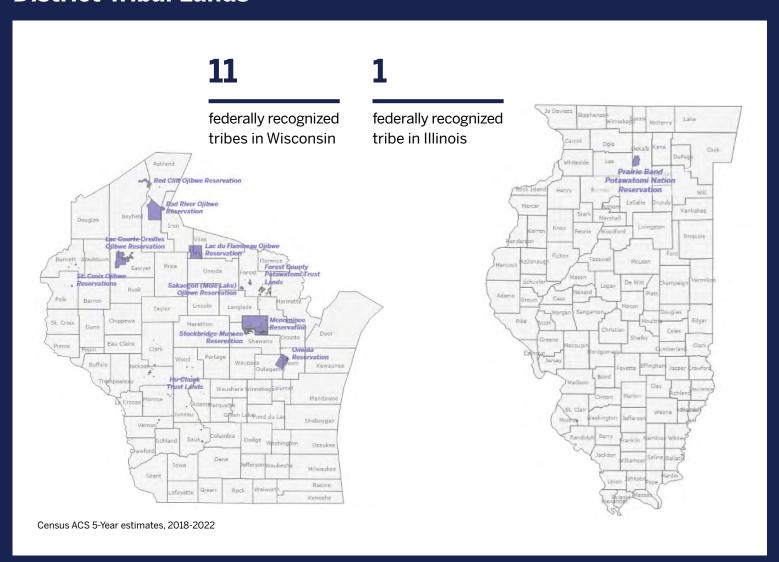
The district's tribal areas contain a disproportionately high share of single-family rental homes compared to the prevalence of rental housing units districtwide and nationally. Tribal land also contains a disproportionately higher share of mobile/manufactured owner-occupied homes than is represented in the general owner-occupied stock in the district and nationally. As the Bank explores new strategies to support the district's Native population, understanding the unique housing and economic dynamics in their communities is critical.



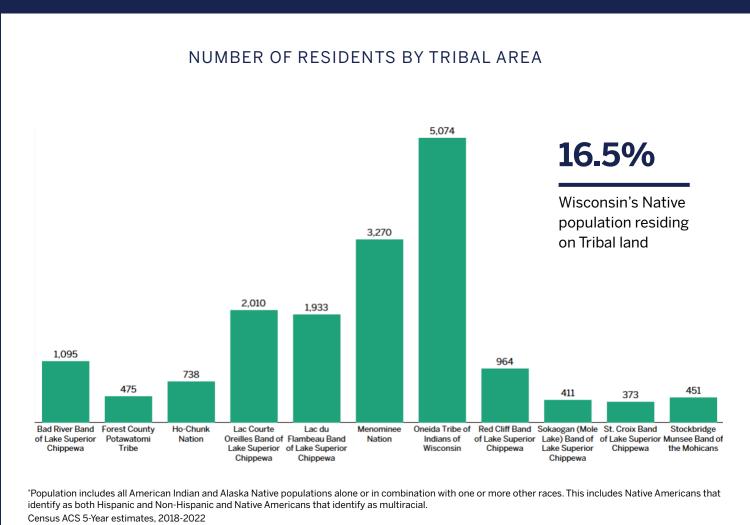
³⁵Census ACS 5-Year estimates, 2017-2021, 2018-2022; Applicable to all population data cited in this section.

Native Population, Housing and Economic Trends

District Tribal Lands

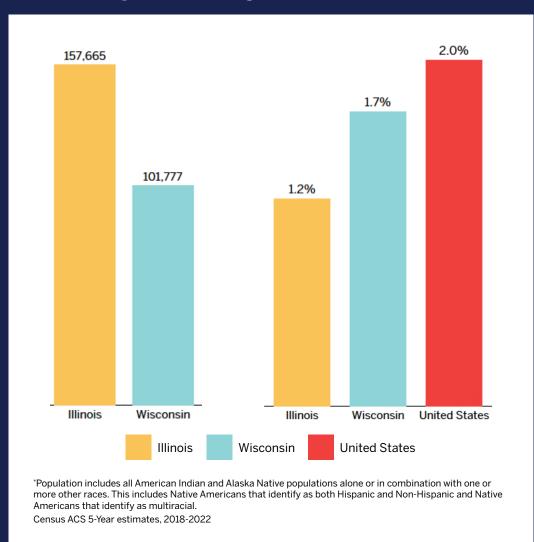


Native Population* by Tribal Area (WI Only)

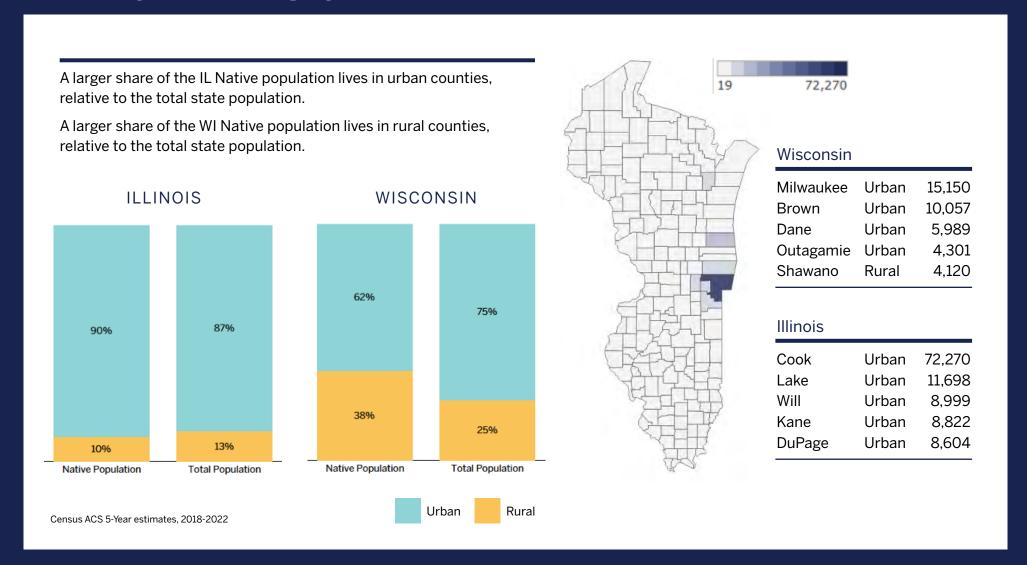


Native Population, Housing and Economic Trends

Native Population* by State



Native Population Geographic Distribution



Native Population, Housing and Economic Trends

Specific housing and economic challenges facing the district's Native population and communities include the following:

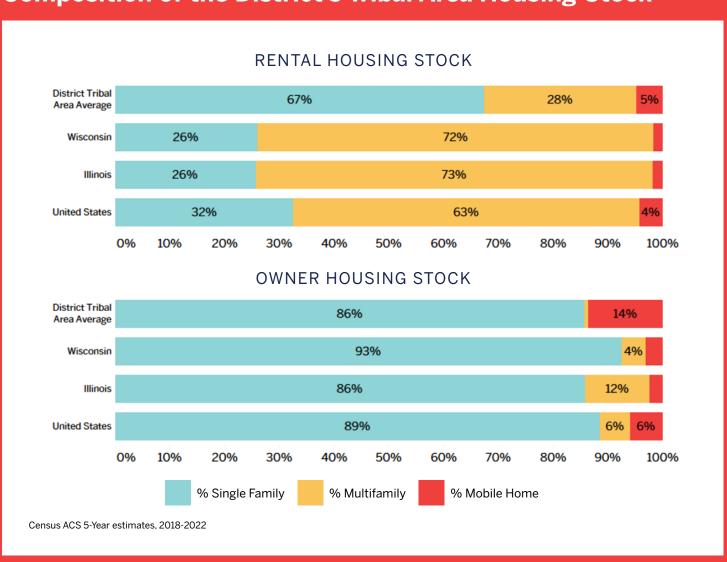
Housing Barriers

- Lack of safe, secure, affordable housing supply (rental and ownership)
- Limited access to financial services, including credit and homebuyer education
- Overcrowding to prevent homelessness
- Limited access to development capital
- Limited infrastructure to support development, including roads, sewer, public utilities, and broadband service
- Mortgage lending challenges on tribal land

Economic Barriers

- Limited access to financial services, capital and credit
- Limited governmental capacity to lead the planning and execution of development initiatives
- Limited infrastructure to support development, including roads, sewer, public utilities, and broadband service
- Workforce-job skills mismatch
- Job scarcity
- Lack of small business development and technical support resources
- Lack of revenue sources

Composition of the District's Tribal Area Housing Stock



Native Population, Housing and Economic Trends

A network of organizations exists throughout the district to support the needs of Native American communities and individuals. FHLBank Chicago partners with these organizations to deliver products and services that meet needs in their communities. In the district's tribal communities, this network includes tribal housing entities (see table below).³⁶

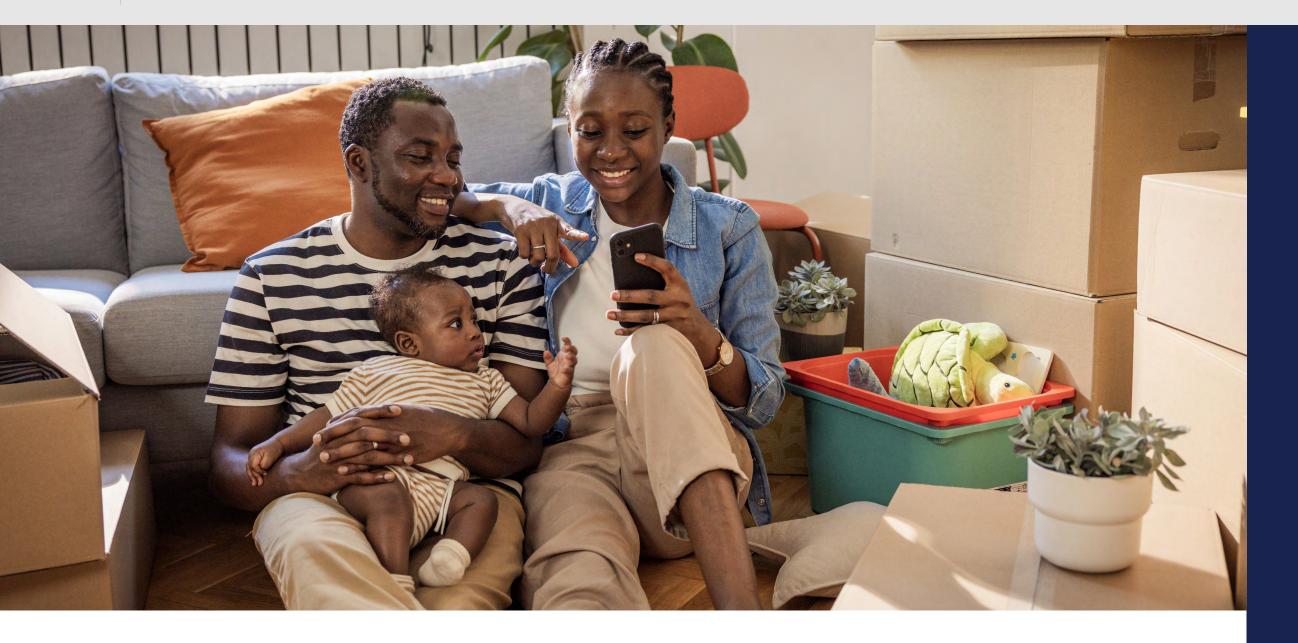
TRIBE NAME	TRIBALLY DESIGNATED HOUSING ENTITIES/AUTHORITIES
WISCONSIN	
Bad River Band of Lake Superior Chippewa Indians	Bad River Housing Authority
Forest County Potawatomi Community	Wisconsin Potawatomi Housing Authority
Ho-Chunk Nation	Ho-Chunk Housing and Community Development Agency
Lac Courte Oreilles Band of Lake Superior Chippewa Indians	Lac Courte Oreilles Housing Authority
Lac du Flambeau Band of Lake Superior Chippewa Indians	Lac du Flambeau Chippewa Housing Authority
Menominee Indian Tribe of Wisconsin	Menominee Tribal Housing Department
Oneida Tribe of Indians Wisconsin	Oneida Housing Authority
Red Cliff Band of Lake Superior Chippewa Indians	Red Cliff Chippewa Housing Authority
St. Croix Chippewa Indians of Wisconsin	St. Croix Chippewa Housing Authority
Sokaogon Chippewa Community — Mole Lake Band of Lake Superior Chippewa	Sokaogon Chippewa Housing Authority
Stockbridge-Munsee Band of Mohican Indians	Mohican Housing Department
ILLINOIS	
Prairie Band Potawatomi Nation	Prairie Bank Potawatomi Nation Housing Department

Wisconsin's four Native CDFIs play an important role in supporting the community development, housing, and financial services needs of the district's Native American communities and populations. Native CDFIs located in Wisconsin include: First American Capital Corporation, First Nations Community Financial, NiiJii Capital Partners, Inc., and Wisconsin Native Loan Fund.

These Native CDFIs collaborate via the Wisconsin Indigenous Housing and Economic Development Corporation to facilitate access to capital, training and financial counseling for members of Wisconsin's 11 federally recognized tribes. In addition, both Wisconsin Native Loan Fund and Bay Bank, a Native-owned bank headquartered in Green Bay, Wisconsin, are FHLBank Chicago members that play an important role in facilitating access to FHLBank Chicago's Mission Programs and other mission-oriented initiatives for Wisconsin's Native communities.

Other organizations supporting economic development and affordable housing for Native Americans in the district include state agencies such as Wisconsin Economic Development Corporation and Illinois Department of Commerce and Economic Opportunity. Numerous other organizations in each state, such as Great Lakes Indian Housing Association and the Great Lakes Inter-Tribal Council, Inc., a regional coordinating body, also support this work. These organizations are important knowledge resources and strategic partners in the Bank's efforts to serve the district's Native population.

³⁶Tribal Nations of Wisconsin, Wisconsin Department of Public Instruction; Eastern Woodlands Tribally Designated Housing Entities, United States Department of Housing and Urban Development.



- **28** Methodology
- **29** Affordable Housing Needs
- **31** Economic Development and Community Lending Needs

III. Needs Assessment

Each year, FHLBank Chicago conducts a Needs Assessment to gather information on affordable housing and community lending needs throughout the district. Informed by quantitative market analysis and qualitative research, the annual Needs Assessment is leveraged to identify gaps in the market and opportunities for FHLBank Chicago program enhancements and new initiatives.

Methodology

The 2025 Needs Assessment incorporates quantitative and qualitative data, including input from stakeholders throughout the district. Data sources for the 2025 TCLP Needs Assessment include:

- Analysis of public and proprietary market data sources
- Third-party research on national, regional, district, and local market trends
- Documentation of community needs published by other, mission-aligned funders (e.g., the Qualified Allocation Plans of state housing finance agencies)
- Discussions with CIAC members (both group and individual meetings)
- Stakeholder interviews (e.g., members, CDFIs, developers, economic development organizations, social service providers, financial services industry leaders, regulatory agencies, and other funders)
- Group convenings (e.g., conferences, working groups, roundtables, investor briefings, community meetings, regional member meetings, etc.)
- Program user feedback ("Voice of the Customer" exercises)

To increase the reach and impact of its Mission Programs and other missionoriented business activities, FHLBank Chicago prioritizes the incorporation of varied perspectives in its Needs Assessment research methodology.



Affordable Housing Needs

The 2025 Needs Assessment identifies the following critical housing needs:

Housing Supply

Affordable rental and owner-occupied housing units are in short supply in the district, which fuels rising housing costs and exacerbates affordability challenges for low- and moderate-income households. Constrained affordable housing supply limits economic opportunities for residents and communities alike.

Specific needs pertaining to housing supply include:

- Development of new units, both owner-occupied and rental; and
- Reinvestment in aging housing stock, both single-family and multifamily.

Housing Affordability/Sustainability

The rising cost of housing relative to income creates housing affordability challenges throughout the district.

- Homeownership Affordability/Sustainability. Homeownership is a powerful tool for building
 individual wealth. However, for many households, it is out of reach. Solutions that bridge the
 affordability gap, support households on the path to homeownership, and reduce ongoing home
 maintenance and operating costs play a pivotal role in facilitating sustainable homeownership for
 low- and moderate-income households.
- **Rental Affordability.** Rising rental housing costs threaten housing stability, particularly for renters in lower income brackets. Supports that reduce operating expenses and rents play a critical role in ensuring renters remain stably housed and have the opportunity for mobility along the housing continuum.

Housing Investment in Underserved Communities

- Rural Communities. Barriers to rural development include high construction costs, limited labor pool, limited capital, aging housing stock, lack of capacity for community development planning activities, population migration dynamics, and low rent ceilings limiting project income, among other factors. Under-investment in housing constrains rural economic development and limits local opportunities for residents.
- **Native Communities.** The district's Native population faces unique barriers in accessing affordable, available housing, including limited inventory, limited infrastructure and development capacity, limited access to financial services, and mortgage lending complexities on tribal land.
- Low-Income Areas. The district experiences high rates of residential segregation by household income. Affordable housing investment in low-income areas yields valuable benefits: 1) expansion of affordable housing stock for current residents, many of whom are housing-cost burdened; 2) opportunities for wealth creation for homebuyers in economically varied communities; and 3) economic revitalization for historically disinvested communities.
- Small (1-24 unit) Development Projects can be an optimal housing solution in smaller
 communities across the district, where there is a clear affordable housing need but no market
 for large-scale developments. Small projects can be challenging to develop; they may not align
 with the priorities of competitive financing programs, and they often cannot support needed
 debt without additional soft funding sources.

Affordable Housing Needs

The 2025 Needs Assessment identifies the following critical housing needs (continued):

Housing for Populations with Heightened Need

- **Homeless Households.** Homelessness remains a critical challenge in both Illinois and Wisconsin. While the district benefits from a network of emergency and transitional housing programs, demand for individual shelter beds and transitional housing units exceeds supply.
- Individuals with Disabilities. Individuals with physical, mental, or developmental disabilities often face unique housing challenges. Research on housing supply and demand for disabled individuals indicates a clear need for more affordable, accessible, and supportive housing options.
- Individuals Recovering from Substance Abuse. Substance abuse often contributes to housing instability and homelessness; likewise, housing instability and homelessness can make it difficult for individuals struggling with substance abuse to achieve recovery. Districtwide, there is a need for supportive housing options for individuals in recovery.
- Individuals Recovering from Physical Abuse, Domestic Violence, Dating Violence, Sexual Assault or Stalking. Lack of safe, affordable housing is a significant barrier faced by many survivors of abuse and violence when they choose to leave an abusive situation. Housing stability is imperative for positive outcomes for individuals and families who have survived abuse and violence.
- **Formerly Incarcerated Individuals.** Formerly incarcerated individuals often face challenges in the housing market. There is a need across the district for expanded access to safe, affordable housing for formerly incarcerated individuals. Housing instability is a key indicator for criminal recidivism.
- Individuals with Barriers to Independent Living. Individuals with chronic barriers to independent living often benefit from service-rich, supportive housing. Permanent supportive housing has been shown to improve health outcomes, housing stability, and economic self-sufficiency, and reduce the number of days spent in shelters, emergency medical facilities, jails, and prisons.
- Large households. Housing for large households is in scarce supply districtwide due to its relatively higher development cost and municipal development restrictions. In many communities, including Native communities, multigenerational living arrangements are common, serving as a key homelessness prevention strategy, despite the fact that overcrowding may pose health and safety risks.
- Workforce. In many communities, lack of affordable housing stock and resulting high housing costs shut the local workforce out of the local housing market, potentially resulting in cost burden for workers, high commute costs borne by either workers or employers, recruitment challenges for employers, and/or economic challenges for communities unable to attract new firms due to lack of local workforce and workforce housing. The need for affordable workforce housing is especially urgent in rural and suburban areas, where space for new firms is abundant, but affordable housing and workforce are scarce.

Support for Emerging Developers

Significant barriers to entry exist for emerging developers of affordable housing. They often experience more limited access to capital, professional networks, and training opportunities. As a result, emerging developers may be excluded from development opportunities that would benefit their communities and position them to invest more deeply in the future. Emerging developers in the affordable housing industry serve as key drivers for innovation and the expansion of local housing stock.

Economic Development and Community Lending Needs

The 2025 Needs Assessment identified the following critical economic development and community lending needs:

Economic Investment in Underserved Communities

Initiatives that expand access to capital for underserved communities are critical drivers for economic development districtwide. Underserved communities include but are not limited to:

- Rural Communities. Barriers to rural economic
 development include: limited local infrastructure, including
 digital infrastructure, limited local capacity for community
 planning and development, limited labor pool, population
 migration dynamics, and higher levels of poverty and
 unemployment in rural areas compared to urban areas.
 Under-investment in rural economic development limits local
 opportunities for residents and communities.
- Native Communities. Native communities in the
 district often navigate heightened barriers to economic
 development. Areas of particular need include: access
 to capital for economic development; investment in
 infrastructure; capacity-building and training for Nativeowned businesses and businesses in tribal areas; and
 capacity building for community planning and development.
- Low-Income Areas. The district experiences high rates of residential segregation by household income. In addition to housing investment, low-income areas require economic investment in order to provide economic opportunities for local businesses and residents alike.

Support for CDFIs, MDIs, Low Income Credit Unions, Nonprofit Lenders, and Financial Counseling Organizations

CDFIs, MDIs, Low Income Credit Unions, and Nonprofit Lenders often lead in the financing of housing, small businesses, community facilities, and real estate development in markets that may be challenging for traditional financial institutions to serve. As a result, the work of these organizations complements, rather than competes with, that of traditional lenders to expand access to capital in disinvested communities. Funding for community-based lending (particularly "patient capital"), capacity-building, and innovation are persistent needs, given strong demand for the products and services of CDFIs, MDI, Low Income Credit Unions and nonprofit lenders. In addition, organizations providing financial counseling services are key facilitators of community lending.

Support for Small Businesses

Small businesses comprise an important sector of the U.S. economy, offering nearly half of all jobs in the district and generating wealth in local communities. However, barriers to growing and sustaining small businesses are substantial. Access to capital is one of the greatest challenges facing small business, particularly in low-income areas.

Support for Targeted, Place-Based Development Strategies

Targeted development strategies focused on the needs of specific communities can be highly effective in delivering concentrated, lasting impact. They have the potential to bring together public and private partners around common, local development goals and introduce opportunities for leverage and collaboration. Supporting local initiatives requires responsiveness and flexibility to meet a project's unique needs and timeline. Targeted, place-based initiatives can also be valuable in providing proof of concept for funders considering expanded initiatives down the line.

Support for Capacity-Building in Community Development

Local leaders are often closest to the needs of their local community, but may lack the resources and/or experience necessary to create and undertake a comprehensive community development strategy. Committed leaders experiencing capacity constraints may require additional resources to assess community needs, identify goals, create implementation plans, identify measures of success, and leverage public and private funding in targeted communities. These challenges are present in urban and rural communities alike.



IV. Strategy and Goals

FHLBank Chicago leverages Mission Programs, along with other mission-oriented business initiatives, in pursuit of the following objectives:

- Expand the supply of affordable housing in the district;
- Improve housing affordability and homeownership sustainability;
- Expand access to capital for housing and economic development;
- Catalyse economic opportunities for residents and communities; and
- Build community capacity for affordable housing and economic development.

In pursuing these objectives, FHLBank Chicago responds to the critical housing and community development needs in our district, facilitates impactful opportunities for our members to support solutions, and delivers on our commitment to housing leadership, while adhering to fair lending laws and regulations, striving to promote equal access to credit, and preventing discriminatory practices in our activities and operations.

The section below summarizes how FHLBank Chicago's 2025 Mission Programs and other mission-oriented initiatives align with identified district needs. Note that new programs and initiatives may be introduced throughout the year; programs and initiatives described herein represent 2025 programs and initiatives approved at the time of this publication.

Impact measures and 2025 performance targets for FHLBank Chicago's Mission Programs and initiatives are also identified in this section.

- **33** Overview of Mission Programs
- **36** Overview of Mission-Oriented Initiatives
- **38** Impact Metrics and Performance Targets

Overview of Mission Programs

Below is a summary of all current FHLBank Chicago Mission Programs:

Affordable Housing Program (AHP) General Fund

The Affordable Housing Program (AHP)
General Fund provides subsidies to support
the acquisition, construction, and/or
rehabilitation of rental or owner-occupied
housing via an annual competitive round. AHP
addresses the identified district needs for:

- Housing Supply: Development of New Units
- Housing Supply: Reinvestment in Aging Housing Stock
- Housing Affordability/Sustainability
- Housing Investment in Underserved Communities
- Housing for Populations with Heightened Need

HOUSING NEEDS ADDRESSED WITHIN AHP SCORING CATEGORIES

Housing for Individuals with Disabilities	\rightarrow	Housing for Special Needs Populations scoring category
Permanent Supportive Housing	\rightarrow	Permanent Supportive Housing scoring category
Housing for Homeless Households	\rightarrow	Housing for Homeless Households scoring category
Housing for Individuals Recovering from Abuse	\rightarrow	Housing for Special Needs Populations scoring category
Housing for Formerly Incarcerated Individuals	\rightarrow	Housing for Special Needs Populations scoring category
Access to Economic Opportunities	\rightarrow	Creating Economic Opportunity Through Mixed-Income Areas scoring category
Housing Affordability/ Sustainability	\rightarrow	Operational Efficiency scoring category

Support for Sustainable Homeownership	\rightarrow	Community Stability: Promotion or Preservation of Homeownership scoring category
Reinvestment in Aging Housing Stock	\rightarrow	Community Stability: Promotion or Preservation of Homeownership and Rehabilitation of Existing Occupied Housing scoring categories
Rural & Tribal Land Housing Investment	\rightarrow	Rural Housing and In-District scoring categories
Investment in Low- Income Areas	\rightarrow	Projects Serving Low-Income Areas scoring category
Housing for Large Households	\rightarrow	Large Family Units scoring category
Small Projects	\rightarrow	Project of 24 or Fewer Units scoring category
Support for Emerging Developers	\rightarrow	Emerging Project Sponsors scoring category

Overview of Mission Programs

Below is a summary of all current FHLBank Chicago Mission Programs:

Downpayment Plus® Programs

Downpayment Plus and Downpayment Plus Advantage® (collectively, "DPP," FHLBank Chicago's AHP Homeownership Set-Aside programs), offer members year-round, easy-to-access downpayment and closing cost assistance for low- and moderate-income homebuyers. This program, which requires participation in homeownership education and counseling, supports sustainable homeownership for low- and moderate-income households. DPP addresses the identified district needs for:

- Homeownership Affordability/Sustainability
- Access to Capital for Underserved Communities

Community Advances and Letters of Credit

FHLBank Chicago offers discounted financing to its members to support affordable housing and economic development lending and community investment. Community Advances and Letters of Credit address the identified district needs for:

- Housing Supply: Development of New Units
- Housing Supply: Reinvestment in Aging Housing Stock
- Homeownership Affordability/Sustainability
- Access to Capital for Underserved Communities
- Support for Small Businesses
- Support for CDFIs, MDIs, Low Income Credit Unions, Nonprofit Lenders, and Financial Counseling Organizations
- Support for Rural Economic Development
- Economic Investment in Underserved Communities

PROGRAMS

Community Housing and Economic Development Advance
Programs: Discounted advances and standby letters of credit

supporting members' eligible community lending.

Community Impact Advance (Pilot): Deeply discounted advances supporting members' eligible lending/investment in affordable housing, economic development, and community activities.

Community Small Business Advance: Deeply discounted advances to match-fund eligible small business lending in low- and moderate-income areas.

Overview of Mission Programs

Below is a summary of all current FHLBank Chicago Mission Programs:

Community First® Housing Counseling Resource Program

The Community First Housing Counseling Resource Program provides grants to HUD-approved housing counseling agencies in Illinois and Wisconsin to support expanded service to lowand moderate-income and underrepresented homebuyers and homeowners. Two FHLBank Chicago housing associates, Illinois Housing Development Authority (IHDA) and Wisconsin Housing and Economic Development Authority (WHEDA), administer the program on FHLBank Chicago's behalf. The Community First® Housing Counseling Resource Program addresses the identified district need for:

- Homeownership Affordability/Sustainability
- Support for CDFIs, MDIs, Low Income Credit Unions,
 Nonprofit Lenders, and Financial Counseling Organizations

Community First Developer Program

The Community First Developer Program supports career development for emerging developers of affordable housing in Illinois and Wisconsin. In 2024, the program supported internships and fellowships for emerging developers, providing valuable professional opportunities for career growth. The Developer Program addresses the identified district needs for:

- Support for Emerging Developers
- Housing Supply: Development of New Units
- Housing Supply: Reinvestment in Aging Housing Stock

Community First Fund

Community First Fund (CFF) is a revolving loan fund supporting economic development and affordable housing in Illinois and Wisconsin. CFF provides flexible, long-term, unsecured financing to partner organizations to invest in affordable housing, commercial real estate, community facilities, or businesses. Partner organizations may include community development financial institutions (CDFIs), community development loan funds, state housing finance agencies, and regional/national intermediaries with a footprint in the district. CFF addresses the identified district needs for:

- Economic Investment in Underserved Communities
- Housing Investment in Underserved Communities
- Housing Supply: Development of New Units
- Housing for Populations with Heightened Need
- Support for Small Businesses
- Support for CDFIs, MDIs, Low Income Credit Unions,
 Nonprofit Lenders, and Financial Counseling Organizations

Overview of Mission-Oriented Initiatives

FHLBank Chicago infuses its community investment mission into its core business lines, which include providing members with liquidity and funding in the form of advances and letters of credit, and providing members with a secondary market alternative for their mortgage assets (i.e., the Mortgage Partnership Finance Program (MPF)). Current mission-oriented initiatives within these business lines include:

Low-Income Housing Tax Credit (LIHTC) Collateral Pilot Program

The LIHTC Collateral Pilot Program provides members with increased lendable value on their pledged collateral for qualifying mortgage loans on LIHTC multi-family housing projects. Through member banks, credit unions, insurance companies, community development financial institutions (CDFIs), and eligible housing associates, the program amplifies and incentivizes lending in support of affordable housing for low-income individuals and families. The LIHTC Collateral Pilot Program addresses the identified district needs for:

- Housing Supply: Development of New Units
- Support for CDFIs, MDIs, Low Income Credit Unions,
 Nonprofit Lenders, and Financial Counseling Organizations
- Housing Investment in Underserved Communities
- Housing for Populations with Heightened Need

VantageScore Collateral Initiative

FHLBank Chicago members may now pledge mortgage collateral using VantageScore credit scores as an alternative to the Classic FICO credit score model. By considering rental payments and other consumer credit data in its scoring algorithms that are not included in traditional scoring models, VantageScore provides an innovative solution aimed at expanding access to sustainable homeownership. This expanded mortgage collateral option gives members an additional resource to originate loans to creditworthy homebuyers. The VantageScore Collateral Initiative addresses the identified district needs for:

- Homeownership Affordability/Sustainability
- Housing Investment in Underserved Communities

Native American Conventional Lending Initiative

FHLBank Chicago is collaborating with Fannie Mae to support mortgage lending in tribal communities. In 2024, Fannie Mae approved the Mortgage Partnership Finance® (MPF®) Program, administered by the Federal Home Loan Bank of Chicago on behalf of six Federal Home Loan Banks, to sell loans made to Native Americans and secured by tribal trust lands under the company's Native American Conventional Lending Initiative (NACLI) program. This collaboration enables MPF Program Participating Financial Institutions (PFIs) serving tribal communities to offer conventional loans on tribal trust lands. NACLI addresses the identified district needs for:

- Homeownership Affordability/Sustainability
- Housing Investment in Underserved Communities

Overview of Mission-Oriented Business Initiatives

MPF Traditional Conventional Housing Impact Pricing Grids

FHLBank Chicago's MPF Traditional program now provides improved pricing when purchasing eligible conforming/conventional loans made to borrowers with income at or below 80% of Area Median Income (AMI). The improved pricing facilitates members' lending to low- and moderate-income homebuyers. Improved pricing reflected in the MPF Housing Impact Pricing Grids addresses the identified district need for:

· Homeownership Affordability/Sustainability

Partnership with the Small Business Administration

For the past 20 years, FHLBank Chicago has served as a partner to the Small Business Administration (SBA) in providing access to capital to privately-owned small business lenders and investors to stimulate and supplement the flow of private capital and long-term debt financing that American small businesses need to operate, expand and modernize their businesses. The on-demand financing we provide through the SBA's just-in-time and discount debenture programs, which involve unsecured loans that carry lower interest rates and longer repayment dates compared to other funding options, enable increased private investment in U.S. small businesses and startups. This partnership with the SBA addresses the identified district need for:

Support for Small Businesses

Investment Portfolio Supporting Affordable Housing

FHLBank Chicago's investment portfolio directly supports affordable housing activity. Specifically, FHLBank Chicago purchases mortgage-backed security investments from the Fannie Mae Delegated Underwriting & Servicing (DUS) Program. In 2024, over 14,000 of the 18,000 rental units (80%) supported by these purchases housed low- and moderate-income residents.³⁷ In addition, FHLBank Chicago provides liquidity to the district's two state housing finance agencies, housing associates Illinois Housing Development Authority (IHDA) and Wisconsin Housing and Economic Development Authority (WHEDA), through standby bond purchase agreements, providing them with funding assurance for their housing mission work. These investments address the identified district needs for:

- Rental Housing Affordability
- Housing Supply

FHLBank Chicago's community investment mission is central to all we do. It manifests in both our Mission Programs and other core business lines, infusing opportunities for community impact throughout. This holistic approach positions community investment impact at the forefront and is our key to bold housing leadership.

2025 Impact Metrics and Performance Targets

To measure performance against community impact objectives, FHLBank Chicago annually establishes impact metrics and performance targets. 2025 programmatic impact metrics and performance targets are below.

2025 HOUSING AND	COMMUNITY DEVEL	LOPMENT IMPACT METRICS
2023 HOUSING AND		

Impact Metric	Impact Target (#)
Housing units created or supported	18,000
Jobs created/preserved	7,000
CDFIs, MDIs, LICUs Nonprofit Lenders, and Financial Counseling Organizations supported	75

In addition to programmatic impact metrics, FHLBank Chicago also sets community leadership and engagement performance targets, as all are key to the successful execution of our housing leadership strategy. Community leadership and engagement activities for 2025, along with performance targets, are listed below.

2025 HOUSING LEADERSHIP AND COMMUNITY ENGAGEMENT PERFORMANCE TARGETS

Leadership/Engagement Activity	Performance Target (#)
Engage in outreach activities to: 1) Expand the use of FHLBank Chicago Mission Programs or mission-oriented initiatives, and/or 2) Build relationships with strategic partners	30
Lead community investment industry convenings	2
Publish community investment white paper(s)	1

Approved by the Board of Directors on the 12th day of December, 2024, and amended on the 28th day of March, 2025.



433 West Van Buren Street Suite 501S Chicago, Illinois 60607



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