

## Executive Summary

### AP-05 Executive Summary - 24 CFR 91.200(c), 91.220(b)

#### 1. Introduction

The U.S. Department of Housing and Urban Development (HUD) requires State and local grantees of the formula grant programs, namely the Community Development Block Grant (CDBG) the HOME Program, the Emergency Solutions Grants (ESG), the Housing Opportunities for Persons with AIDS (HOPWA) and the national Housing Trust Fund (HTF) programs to develop a five-year Consolidated Plan as a condition for funding. The State of Illinois' Consolidated Plan covers those non-entitlement areas of the State that do not have a local Consolidated Plan. The Illinois Housing Development Authority (IHDA) is designated as the lead agency in developing the Consolidated Plan.

The Office of Housing Coordination Services (OHCS) of the Strategic Planning and Reporting (SPAR) Division at IHDA has primary responsibility for coordinating, developing and distributing the Plan, and receives input from the OHCS Advisory Committee and the general public in developing and updating the Plan.

Executive Order 2003-18 established the State of Illinois' Comprehensive Housing Initiative on September 16, 2003, and created the Housing Task Force to improve the planning and coordination of the State's housing resources through 2008. The Comprehensive Housing Planning Act (P.A. 94-965) of 2006 codified Executive Order 2003-18. The Comprehensive Housing Planning Act was renewed (as amended P.A. 99-0564) and extended to 2026 in legislation passed into law in 2016. The Executive Director of the Illinois Housing Development Authority (IHDA) is Chair of the State's Housing Task Force, joined by a panel of forty-four representatives from State agencies and the housing community. The identification of the following eight priority populations provides specificity to the State's housing priorities:

- Low-income Households (with particular emphasis on households earning below 30% of area median income);
- Low-income seniors;
- Low-income persons with disabilities;
- Homeless persons and persons at risk of homelessness;
- Low and moderate- income persons unable to afford housing near work or transportation (Live Near Work); and
- Low-income persons residing in existing affordable housing that is in danger of being lost or becoming unaffordable (Preservation)
- Low-income people residing in communities with ongoing community revitalization efforts

- Other special needs populations, including people with criminal records and veterans experiencing or at risk of homelessness.

Per the Act, the State of Illinois shall continue to prepare and be guided by an annual comprehensive housing plan addressing the housing needs of the underserved populations. Annual Comprehensive Housing Plans are to include an identification of funding sources for which the State has administrative control that are available for housing construction, rehabilitation, preservation, operating or rental subsidies, and supportive services.

## **2. Summarize the objectives and outcomes identified in the Plan**

This could be a restatement of items or a table listed elsewhere in the plan or a reference to another location. It may also contain any essential items from the housing and homeless needs assessment, the housing market analysis or the strategic plan.

The State of Illinois will use the following HUD-determined Objective and Outcome statements for its CPD-formula activities:

- Accessibility for the purpose of creating suitable living environments
- Accessibility for the purpose of creating economic opportunities
- Affordability for the purpose of providing decent affordable housing
- Affordability for the purpose of creating economic opportunities
- Sustainability for the purpose of creating suitable living environments

Sustainability for the purpose of providing decent affordable housing

## **3. Evaluation of past performance**

This is an evaluation of past performance that helped lead the grantee to choose its goals or projects.

On August 27, 2017, HUD's Office of Community Planning and Development in Chicago issued its 2017 Program Year End Review Letter to the State of Illinois. The letter is on file with and available through IHDA's Office of Housing Coordination Services. Points of note:

### **Evaluation of Past Performance**

HUD determined the State has the continuing capacity to administer Community Planning and Development Programs.

### **CDBG**

- The State is meeting the 15-month goal to obligate 100 percent of its CDBG funds, and did not exceed the 3 percent cap on the CDBG funds for administrative and technical assistance costs.
- 2018 was the first year of the State's 2018, 2019, 2020 low/mod compliance period for its CDBG funds on projects and programs that would benefit low and moderate income people. As the 2018 allocation was not available until November, grants are currently in award phase. Compliance cannot be evaluated until entered into IDIS. A review of CDBG Activities contains no flags and only three activities are Pending-At-Risk based on the length of time since the last draw.

#### **Evaluation of Past Performance continued: HOME**

The Illinois Housing Development Authority received the HUD PY-End Review Letter dated August 27, 2018.

**Housing Trust Fund-** HUD requested an explanation on the lack of progress for HTF goals reported in the 2017 Performance Evaluation Report

IHDA HTF Response:

The 2016 Performance Evaluation Report (PER) 2.0 was submitted to HUD review on June 1, 2017. IHDA responded to HUD's 2016 Year-End Letter (YEL) Sept 28, 2017. However, as of the date of HUD's 2017 YEL of Aug 27, 2018. HUD had not indicated in IDIS that review of the 2016 Illinois PER was complete. In response to the 2016 YEL (Sept 28, 2017) IHDA included the below info on funding under the 2016 Housing Trust Fund

"IHDA's Board awarded the State's 2016 Program Year HTF funds to Pearl Street Apartments in the amount of \$3,879,049 on May 19, 2017. The project has not had an initial closing and therefore is not currently shown as being obligated in IDIS. The transaction team currently estimates reaching an initial closing on or around February 28, 2018."

June 1, 2017, the 2016 CAPER 2.0 was submitted to HUD, HTF screens/functionality were not available in the IDIS system. Nor were HTF goal info available for generation in the 2016 Action Plan or PER. However, the amended 2016 Action Plan 3.3 (with HTF screens and goals by then implemented in the IDIS system), was only approved by HUD on Feb 16, 2018.

Once review of the 2016 CAPER is complete, the State can submit an amendment of the 2016 PER 2.0 including 2016 HTF goals and progress, since project info from an updated 2016 Action Plan 3.3 would then automatically generate to the 2016 PER, and all subsequent PERs under the 2015-2019 Consolidated Plan.

Re 2017 HTF funds, IHDA's Board awarded the 2017 PY HTF funds to Prairie Trail (\$3,223,569) and Union Avenue Apartments (\$3,223,569) for a total of \$6,447,138 on Sept 21, 2018. The project has not had an initial closing and therefore is not currently shown as being obligated in IDIS.

### **HOUSING TRUST 2017 FUNDS**

2017 HTF funds- IHDA's Board awarded 2017 PY HTF funds to Prairie Trail (\$3,223,569) and Union Avenue Apartments (\$3,223,569), totaling \$6,447,138 on Sept 21, 2018.

### **Evaluation of Past Performance continued: HOME and NSP**

**HOME-** HUD identified five items in the Year End Letter. The State needed to provide an explanation for uncommitted funds and lack of disbursements involving five 2017 HOME projects; needed to explain a discrepancy in the amount of HOME Program Income receipts reported in the PER not matching with the IDIS PR 09. HUD referenced the four-month warning issued to IHDA May 31, 2018 re possible recapture of CHDO funds not reserved in the-24 month Deadline Compliance period.

HUD requested info on a red flag re HOME funds undisbursed (from 1992) through FY 2013.

HUD directed the state provide an update for three activities in the HOME Open Activities report that have been open for more than a year and one activity approaching one-year open status

**Neighborhood Stabilization Programs 1 and 3-**HUD referenced a concern re outstanding fund balances in the LOCCS system, and unobligated program balances in the DRGR system. HUD directed the State to determine final use of NSP funds, and create a closeout strategy

IHDA HOME and NSP response

### **2017 ACTION PLAN**

Regarding HOME- Funds, have been committed and the State was working towards disbursements.

### **HOME PROGRAM INCOME**

2017 HOME Program Income reported in the 2017 PER- total HOME Program Income received in PY 2017 was \$6,379,964.67. The total amount of HOME Program Income drawn in Program Year 2017 was \$2,144,450.82

**2016 HOME-CHDO RESERVATIONS-** were committed on Sept 4, 2018. The State met the 24-month CHDO commitment deadline.

### **HOME SUMMARY OF CONSOLIDATED PLAN PROJECTS FOR REPORT YEAR**

HOME projects without committed amounts and/or disbursements- the five 2017 projects were: Orton Keys, Indian Trails Apartments, Lathrop Homes, Evanston PSH and Spring Hill. The five projects had been committed. Orton Keyes, Indian Trails and Spring Hill individually had balances of \$10,000 each. IHDA held-off final disbursement until construction completion, in order to avoid the 120-day completion requirement. Lathrop Homes and Evanston PSH were under construction, but HOME funds went out later in the project.

#### **HOME Performance Evaluation “snapshot” Report**

The HUD Performance Snapshot Report noted a red flag re program progress due to undisbursed HOME funds (from 1992) through FY 2013. Records indicated the State is fully disbursed through FY 2014 and currently utilizing funds from FY 2015. IDIS PR-27 Report corroborated. IHDA’s compliance team worked with Region V to resolve the issue.

#### **HOME FLAGGED Activities Report– project completion**

HOME Open Activities Report- the IHDA's Compliance & Reporting Group reviews this report monthly to ensure activities are completed within the required 120 days. As of the Sept 24, 2018, one activity has been closed and three (3) activities still require completion reports:

One Activity had closed

**Orton Keyes** – IHDA anticipated closing by year-end

**The Landings at Belle Meadow** - IHDA expected completion in IDIS by Dec. 31, 2018.

**St. Elizabeth**– the last construction draw request was received by IHDA, and it included the \$10,000 HOME balance - IHDA expected completion in IDIS by Dec. 31, 2018.

#### **NEIGHBORHOOD STABILIZATION PROGRAM OBLIGATIONS AND EXPENDITURES**

IHDA had received remote Technical Assistance (TA) to facilitate the reconciliation of NSP program and fund balances and finalize a close strategy

#### **Evaluation of Past Performance continued: ESG, HOPWA, CDBG-DRGR**

- Regarding the Emergency Solution Grants, all 2016 ESG funds were obligated within the required 60-day period and the State met the requirement for making quarterly drawdowns. The State committed 7.42 percent of ESG funds for administrative activities, in compliance with HUD regulation. The State had \$88,500.41 available to draw from 2015 ESG funds. The expenditure deadline for 2015 funds occurred November 4, 2017. Other than a de minimis account of pre-2015 funds, which HUD recaptured (\$1), the State met this requirement and was

on target to meet the deadline for 2015 ESG funds. The State committed 50.30% of its 2016 ESG allocation to Shelter and Street Outreach activities. HUD recognizes these needs through Illinois and encourages the State to consider investing more on these activities.

- The State HOPWA program was assessed during PY 2016 to determine compliance with the three-year expenditure deadline requirement. The State had expended 69.25 % percent of the 2013 HOPWA grant and was not in compliance.

To address the deficiency, the State is making a substantial amendment to the 2010-2014 Five-Year Consolidated Plan to use unexpended HOPWA funds for the necessary repair and rehabilitation, supportive services and STRMU of HIV/AIDS Housing Facilities and HIV Care Connect Lead Agents. This reflects a prior substantial amendment to the 2015-2019 Five Year Consolidated Plan that HUD approved on August 7, 2017.

- As of July 15, 2017, the State has just over \$739,000 left to obligate for the IKE grants. \$250,000 will be added to this amount as the State paid the first installment due resulting from the OIG monitoring and finding. The State is in the process of closing the Disaster Grant for Spring Flood under funding for Hurricane Sandy.
- The CDBG program was monitored on-site during the 2017 program year. No findings or concerns were issued and HUD has notified the State they do not intend to monitor onsite in 2018. One finding of non-compliance for 2013 regarding eligible use of Revolving Loan by Units of General Local Government was closed.

HUD has determined that the State of Illinois has the continuing capacity to administer Community Planning and Development programs, and the activities under CDBG, HOME, HOPWA, ESG and HTF were consistent with its Consolidated Plan. The State used the funds appropriately and as intended to address needs

#### **4. Summary of Citizen Participation Process and consultation process**

Summary from citizen participation section of plan.

Summary from citizen participation section of plan.

The Citizen Participation Plan centers around the public hearing and public comments processes. The State held one three-way public hearing on Thursday, May 30, 2019 at 10:00 A.M. at the Illinois Dept of Commerce and Economic Opportunity, 500 E. Monroe, 4th Floor in Springfield; in Chicago at the James R. Thompson Center in the Illinois Conference Room, 100 West Randolph Street, and in Marion at the State of Illinois Building at 2309 West Main Street. The Public Comment period began Tuesday May 7, 2019 and ended Wednesday June 5, 2019.

- A 2019 Public Notice was e-mailed statewide to housing-related agencies and organizations, a number of which included announcement of same in a newsletter or mailing sent to their memberships. Copies were also sent to the members of the OHCS Advisory Committee and CDBG Entitlement Grantees
- The Public Notice was published prior to these hearings in the following ten (10) newspapers: *Belleville News Democrat; Breeze Courier; News-Gazette; Daily Southtown; Quincy Herald-Whig; Peoria Journal-Star; The Dispatch Argus; Rockford Register Star; Southern Illinoisan and the State Journal-Register.*
- DCEO e-mailed notices of the public hearing to CDBG-eligible units of general local government in Illinois (i.e., non-entitlement cities, towns, villages, and counties).
- Hard copies of the draft Consolidated Plan 2019 Action Plan were made available to interested parties as requested. Electronic copies were sent to the OHCS Advisory Committee, State Agencies Housing Committee, Illinois Housing Task Force, Affordable Housing Trust Fund Advisory Commission, Community Development Block Grant (CDBG) Entitlement grantees, Community Action Agencies, Regional Planning Commissions, Public Housing Authorities and other groups. The draft plan was also posted on IHDA's website at [www.ihda.org](http://www.ihda.org).
- The public hearing was held during the 30-day public comments period in Springfield. The date for the hearing, May 30, 2019, was also posted on IHDA's web-site.
- The agenda for the public hearing is included below
- All notices clearly stated the site was accessible for persons with disabilities. IHDA made reasonable efforts to accommodate persons with sight-and hearing-impaired disabilities, as well as for significant groups of Non-English speaking residents.
- Notes from the public hearing are included in the plan
- One public comments letter was received during the public comments period. Response to this letter is included in the appendices to this document
- The development of both the Citizen Participation Plan and Consolidated Plan provided more than ample opportunity for the public to provide comments. As mentioned previously, all public hearing sites are fully accessible to persons with disabilities

The criteria which the State uses to determine if certain proposed program or policy changes constitute a substantial amendment to the Consolidated Plan are as follows:

### **Changes**

#### **The following circumstances will trigger a substantial amendment to the Five Year Plan and subsequent Action Plans:**

(1) A major statutory change occurs in the enabling law which created the program that modifies the eligible types of applicants and/or the eligible types of activities which can be carried out, provided same were not at least partially eligible under the original statute and rules.

(2) Major changes in the use of the four formula grant funds from one eligible activity (as identified in the Consolidated Plan) over the original planned use.

(3) Other legislative or administrative actions that serve to significantly alter which agency(ies) are operating which existing, expanded, or new programs covered under the current (or potentially expanded) Consolidated Plan.

- In any of the above cases, this citizen participation plan will require that public notification occur per the following: written notification to IHDA Board of Directors, OHCS Advisory Committee, State Agencies Housing Committee, and 32 other housing-related organizations, to inform them of the proposed amendment and provide for a 30-day public comments period; and publication of press releases and public notices, and mailings, as is appropriate, to affected parties.

(4) The State shall consider all legitimate comments on the amendment, which are received in writing and orally at public hearings (if held) from the general public or units of general local government. A summary of those comments and the State responses to same will be attached to the substantial amendment, which the State will then forward to HUD for review and approval.

### **Public Hearing Agenda**

Public Hearing

For the State of Illinois'

State Consolidated Plan-Draft 2019 Action Plan

Thursday, May 30, 2019 @ 10:00 A.M.

Illinois Department of Commerce and Economic Opportunity - 4th Floor Conference Room, 500 East Monroe, Springfield

James R Thompson Center - Illinois Conference Room, 100 E. Randolph, Chicago

State of Illinois Building - Conference Room, 2309 West Main Street, Marion

### Agenda

- Welcome and Introductions/Overview of Agenda – Office of Housing Coordination Services, Strategic Planning and Reporting (SPAR-OHCS) Illinois Housing Development Authority (IHDA)
- Historical Overview of the State Consolidated Plan; Citizen Participation Process; State Priorities – IHDA
- The Comprehensive Housing Plan Act (P.A. 94-965) and the Annual Comprehensive Housing Plan



- State's Draft 2019 Action Plan and the Major HUD Formula Funding Programs:
- Community Development Block Grant (CDBG) and the Non-Housing Community Development Plan - Illinois Department of Commerce and Economic Opportunity (DCEO)
- HOME Investment Partnerships Program – Illinois Housing Development Authority (IHDA)
- National Housing Trust Fund (NHTF)-Illinois Housing Development Authority (IHDA)
- Emergency Solutions Grant (ESG) – Illinois Department of Human Services (IDHS)
- Housing Opportunities for Persons With AIDS (HOPWA) – Illinois Department of Public Health
- Other Funding and Other Actions– IHDA
- Public Comments and Testimony/Question and Answer Period

Adjournment

## **5. Summary of public comments**

This could be a brief narrative summary or reference an attached document from the Citizen Participation section of the Con Plan.

The Public Comment period began Tuesday, May 5, 2019 and ended Wednesday June 25, 2019. The State held one three-way public hearing on Thursday, May 30, at 10:00 P.M in Springfield, Chicago and Marion. \_\_ public comment letter was received. The response is included in the appendices to this document

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

Not applicable. One public comments letter was received during the public comments period. The response is included in the appendices to this documents. In addition to the public hearings for the Consolidated Plan, OHCS schedules regular quarterly meetings of the OHCS Advisory Committee (AC) to update the public on formula grant activities and provide for discussion, comment, and feedback on various Consolidated Plan-related issues. An AC meeting was also held during the public comments period, in Springfield, on \_\_\_\_, the day before the Public Hearing.

## **7. Summary**

In addition to the public hearings, OHCS schedules meetings of the OHCS Advisory Committee (AC) to update the public on formula grant activities and provide for discussion, comment, and feedback on various Consolidated Plan-related issues. AC meetings in 2019 were held on \_\_\_\_ and \_\_\_\_\_. Minutes of these regularly scheduled meetings are available upon request to the Strategic Planning and Reporting/ Office of Housing Coordination Services

**PR-05 Lead & Responsible Agencies - 91.300(b)****1. Agency/entity responsible for preparing/administering the Consolidated Plan**

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

| Agency Role         |          | Name  | Department/Agency |
|---------------------|----------|---|-------------------|
| CDBG Administrator  | ILLINOIS | Department of Commerce and Economic Opportunity |                   |
| HOPWA Administrator | ILLINOIS | Department of Public Health                     |                   |
| HOME Administrator  | ILLINOIS | IL Housing Development Authority                |                   |
| ESG Administrator   | ILLINOIS | Department of Human Services                    |                   |
|                     | ILLINOIS | IL Housing Development Authority                |                   |

**Table 1 – Responsible Agencies****Narrative****Lead Agency Designation**

Governor Jim Edgar designated the Illinois Housing Development Authority (IHDA) as the lead entity for developing and producing the State Consolidated Plan and related documents (See Attachment).

The Comprehensive Housing Plan Act (P.A. 94-965) of June 30, 2006, established the State of Illinois' first-ever Comprehensive Housing Act. The Act calls for: the creation of a Housing Task Force; the development of a State comprehensive housing plan, with staff support and coordination assistance from IHDA; the identification of underserved populations; the encouragement to more effectively use available funds from IHDA and other State agencies in a single application process; annual progress reporting; and other features. While many of these areas have in fact been historically addressed by the State Consolidated Plan, they have been done so on a voluntary, administrative basis rather than with legislative or executive (Governor's) mandate. Furthermore, the identification of underserved populations in the Act now provides more specificity to the State's housing priorities.

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Illinois is eligible to receive grants under all five major HUD formula funding programs. These formula grants are administered by the four different State agencies as included in the chart above.

Governor Pat Quinn designated the Illinois Housing Development Authority as the administering State agency for the National Housing Trust Fund. The fourth year of national HTF funding will occur in the fifth (2019) year of the Five Year Consolidated Plan

### **Consolidated Plan Public Contact Information**

#### **Illinois Department of Commerce and Economic Opportunity (CDBG)**

500 E. Monroe

Springfield, Illinois 62701

Contact: David Wortman

Ph: 217/558-4200 Fax: 217/558-4107

Alternate: Wendy Bell

#### **Illinois Housing Development Authority (HOME and National Housing Trust Fund)**

111 E. Wacker Drive

Suite 1000

Chicago, IL 60601

Contact: Burton Hughes

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Ph: 312/836-5354 Fax: 312/832-2191

Alternate: Melinda Koenig

**Illinois Department of Human Services (ESG)**

823 E. Monroe

Springfield, IL 62702

Contact: Josalyn Smith

Ph: 217/524-8612

**Illinois Department of Public Health (HOPWA)**

Contact (Division of Infectious Diseases, HIV/AIDS Section):

Deborah Grant

Ph: 217/785-5260 Fax: 217/524-6090

35 W. Jefferson

Springfield, IL 62761

Contact (Division of Environmental Health): Jeffrey Maras

Kert McAfee

Ph: 217/557-4519 Fax: 217/725-6112



## **AP-10 Consultation - 91.110, 91.300(b); 91.315(l)**

### **1. Introduction**

The State consulted the following major advisory bodies:

- Office of Housing Coordination Services (OHCS) Advisory Committee - This is an advisory group to OHCS/SPAR. This Committee's major functions are to provide input into the Consolidated Plan development (Five-Year Plan, Action Plans, and Annual Performance Reports), as well as to help set other housing goals and respond to changing policy. OHCS staff meets with this group of public and private sector housing practitioners and advocates on a quarterly basis
- The Illinois Housing Task Force - The Task Force consists of members which are representative of various governmental agencies and/or offices, four of which are appointed by the four legislative majority and minority leaders and sixteen of which were appointed directly by the Governor based on their expertise on housing or housing-related areas. The Task Force is chaired by the Executive Director of IHDA and Vice-Chaired by a non-governmental sector representative appointed by the Governor

### **Provide a concise summary of the state's activities to enhance coordination between public and assisted housing providers and private and governmental health, mental health and service agencies**

Public Housing Authorities are represented on the OHCS Advisory Committee, the Housing Task Force, and the Affordable Housing (Trust Fund) Advisory Commission.

Also, IHDA participates on the Board of the National Association of Housing and Redevelopment Officials (NAHRO) at the State, Regional, and National levels. This allows for planning and involvement in a variety of conference and training topics of mutual interest to PHAs, community development agencies, and the State. Examples of sessions at recent NAHRO conferences include the following: Affordable Housing Development 101 and Affirmatively Furthering Fair Housing.

IHDA also works closely with the Illinois Housing Council (IHC) an affordable housing membership organization. IHC co-sponsors the Governor's Conference on Affordable Housing with IHDA annually

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

Coordination with local Continuums of Care is a major strategy under the State's ESG program, which prioritizes assistance to Very and Extremely Low Income Households, Homeless and At-Risk Homeless Persons and Families, and homeless persons with Disabilities. The State supports applications by eligible

CoCs for funding under HUD's Continuum of Care and Rural Housing Stability Assistance Programs, including the review of application under HUD's programs in order to provide Certifications of Consistency with the State's Consolidated Plan.

The State participates in monthly conference calls with Continuum of Care representatives, organized by Housing Action Illinois and the Supportive Housing Providers' Association.

Representatives from several State agencies and the Governor's Office serve on the planning committee for the homeless service providers' annual Peer-to-Peer Conference/Workshop/Training organized by HUD annually.

Illinois is one of the states whose Governor signed on to the Mayor's Challenge to End Veteran Homelessness, and its Department of Veterans Affairs (IDVA) is very active in this area.

Several State agency representatives serve on Boards for Continuums of Care and/or homeless shelters and other service providers, although this activity is more concentrated in Chicago, Cook County, and Springfield.

Continuum of Care agencies are represented on the State's Interagency Council on Homelessness (ICH). The State's ICH was formed as a result of an award of a grant through the Federal SAMHSA. However, an expanded scope, work plan and sustainability plan are currently being drafted

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

Statewide Continua of Care (CoC) make recommendations to the Illinois Department of Human Services (IDHS) for funding to units of local government or private not-for-profit organizations within their jurisdictions. The Department reviews proposals for each of the organizations recommended for funding by the CoCs, and makes awards based on the merit of the proposal and past performance. The amount of the grant depends on the amount negotiated based on the application submitted, and the recommendation by the local CoC. Local Continua of Care designate the HMIS for their areas. All activities must comply with HUD's standards on participation, data collection, and reporting under a local HMIS

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

**Table 2 – Agencies, groups, organizations who participated**

|   |  |  |
|---|--|--|
| 1 | <b>Agency/Group/Organization</b>   | ALLIANCE TO END HOMELESSNESS IN SUBURBAN COOK COUNTY   |
|   | <b>Agency/Group/Organization Type</b>  | Housing<br>Services - Housing<br>Services-Victims of Domestic Violence<br>Regional organization  |
|   | <b>What section of the Plan was addressed by Consultation?</b>   | Homeless Needs - Chronically homeless<br>Homeless Needs - Families with children<br>Homelessness Needs - Veterans<br>Homelessness Needs - Unaccompanied youth<br>Homelessness Strategy                               |
|   | <b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b> | Helps refine the Illinois Continuum-wide request for information for the homeless needs assessment   |
| 2 | <b>Agency/Group/Organization</b>   | Corporation for Supportive Housing   |
|   | <b>Agency/Group/Organization Type</b>  | Housing<br>Services - Housing<br>Services-Persons with Disabilities<br>Services-homeless   |
|   | <b>What section of the Plan was addressed by Consultation?</b>   | Homeless Needs - Chronically homeless<br>Homeless Needs - Families with children<br>Homelessness Needs - Veterans<br>Homelessness Needs - Unaccompanied youth<br>Homelessness Strategy<br>Non-Homeless Special Needs |



|   |  |  |
|---|--|--|
|   | <b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b> | A member of the OHCS Advisory Committee. Helps communities create permanent supportive housing with services to prevent and end homelessness, provides capacity building, training; pre-development funding and advocacy services for supportive housing developers and projects   |
| 3 | <b>Agency/Group/Organization</b>   | Development Services Group, Inc.   |
|   | <b>Agency/Group/Organization Type</b>  | Housing<br>Services-Elderly Persons<br>Business Leaders  |
|   | <b>What section of the Plan was addressed by Consultation?</b>   | Non-Homeless Special Needs   |
|   | <b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b> | Policies.-Sessions on fair housing-related topics are included in statewide conferences, including the Illinois NAHRO annual conference, Illinois Association of Housing Authorities (IAHA), Housing Action Illinois (HAI), Supportive Housing Providers Association (SHPA), Rural Partners/Illinois Institute for Rural Affairs, and others.-Illinois Realtor (fka the Illinois Association of Realtors) works jointly with IDHR on a fair housing program to publicize passage of the Fair Housing Act |
| 4 | <b>Agency/Group/Organization</b>   | IFF (formerly Illinois Facilities Fund)  |
|   | <b>Agency/Group/Organization Type</b>  | Housing<br>Regional organization<br>Private Sector Banking / Financing   |
|   | <b>What section of the Plan was addressed by Consultation?</b>   | Non-Homeless Special Needs   |

|   |  |  |
|---|--|--|
|   | <b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b> | A non-profit lending institution that focuses on human service agencies unable to obtain traditional financing for real estate projects. The IFF also undertakes special real estate development programs with government and non-profit organizations. Under HOME First IFF acquires, develops and owns integrated housing that remains permanently affordable to very low-income persons with disabilities |
| 5 | <b>Agency/Group/Organization</b>   | Illinois Manufactured Housing Association  |
|   | <b>Agency/Group/Organization Type</b>  | Housing<br>Business Leaders  |
|   | <b>What section of the Plan was addressed by Consultation?</b>   | Housing Need Assessment  |
|   | <b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b> | Member of the OHCS Advisory Committee: IMHA serves as a trade organization for the manufactured housing industry, representing manufacturers, retailers, suppliers and rental community owners   |
| 6 | <b>Agency/Group/Organization</b>   | Illinois Mental Health Planning and Advisory Council   |
|   | <b>Agency/Group/Organization Type</b>  | Services-Children<br>Services-Elderly Persons<br>Services-Persons with Disabilities  |
|   | <b>What section of the Plan was addressed by Consultation?</b>   | Non-Homeless Special Needs   |
|   | <b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b> |  |

|   |  |   |
|---|--|---|
| 7 | <b>Agency/Group/Organization</b>   | Illinois Department of Public Health  |
|   | <b>Agency/Group/Organization Type</b>  | Housing<br>Services-Children<br>Services-Persons with Disabilities<br>Services-Persons with HIV/AIDS<br>Services-Health<br>Health Agency<br>Publicly Funded Institution/System of Care<br>Other government - State  |
|   | <b>What section of the Plan was addressed by Consultation?</b>   | Non-Homeless Special Needs<br>HOPWA Strategy<br>Lead-based Paint Strategy   |
|   | <b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b> | A member of Advisory Committee and administrator of the Housing Opportunities for Persons with AIDS (HOPWA) program, one of the five formula grant programs, which enables IDPH to promote housing and health stability for low-income people living with HIV/AIDS in Illinois. IDPH also administers the State's Lead Poisoning Prevention and Healthy Homes Programs through the Office of Environmental Health. IDPH enforces the Lead Poisoning Prevention Act, and the Lead Poisoning Prevention Code. IHDA serves on both the Lead Safe Housing Advisory Council and the Lead Poisoning Elimination Advisory Council, both administered by IDPH |
| 8 | <b>Agency/Group/Organization</b>   | Lt. Governor's Rural Affairs Council  |
|   | <b>Agency/Group/Organization Type</b>  | Services-Health<br>Services-Education<br>Services-Employment<br>Other government - Local<br>Regional organization   |

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|    | <b>What section of the Plan was addressed by Consultation?</b>   | Economic Development   |
|    | <b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b> | IHDA Staff attend Quarterly Meeting of the LG rural Affairs Council  |
| 9  | <b>Agency/Group/Organization</b>   | Illinois Council on Developmental Disabilities   |
|    | <b>Agency/Group/Organization Type</b>  | Services-Persons with Disabilities<br>Other government - State<br>Planning organization  |
|    | <b>What section of the Plan was addressed by Consultation?</b>   | Non-Homeless Special Needs   |
|    | <b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b> |  |
| 10 | <b>Agency/Group/Organization</b>   | Illinois Emergency Management Agency   |
|    | <b>Agency/Group/Organization Type</b>  | Housing<br>Other government - State<br>Planning organization   |
|    | <b>What section of the Plan was addressed by Consultation?</b>   | Disaster Response  |
|    | <b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b> | Member of the State of Illinois Housing Task Force. IEMA Staffs the Ad Hoc Disaster Recovery Working Group (AHDRG) through the ACHP Housing Task Force. Membership of the AHDRG include IHDA staff |

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

Not applicable. The State is open to consultation regarding affordable housing with any interested parties. Please refer to the list of consulting agencies and organizations contained in the 2015-2019 Consolidated Plan, which include: Illinois Housing Development Authority; Illinois Department of Commerce and Economic Opportunity; Illinois Department of Human Services; Illinois Department of Public Health; Illinois Department on Aging; Illinois Department of Children and Family Services; Illinois Department of Healthcare and Family Services; Illinois Department of Veterans Affairs; Illinois Department of Human Rights; Illinois Department of Corrections; Illinois Council on Developmental Disabilities; Office of the Attorney General of Illinois; Champaign, Macoupin County, Peoria, Rockford, Springfield, Winnebago, and Woodford County Housing Authorities; Illinois Housing Council; and others

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

| Name of Plan      | Lead Organization           | How do the goals of your Strategic Plan overlap with the goals of each plan?   |
|-------------------|-----------------------------|--|
| Continuum of Care | Regional Continuums of Care | There are twenty Illinois Continuum of Care (COC) statewide. Illinois CoCs coordinate their work with the Emergency Solutions Grants Program administered by IDHS, employing several similar strategies for ending homelessness in each of their jurisdictions and include the following: conducting coordinated assessments, developing additional permanent supportive housing, improving outreach, increasing capacity and enhancing organization, conducting public awareness activities to foster support, and improving transportation services (especially in rural areas). |

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| Assessment of Fair Housing-FH Impediments | State and Local Governments | <p>On January 5, 2018, HUD extended the deadline for submission of an Assessment of Fair Housing (AFH) by local government program participants until the next Five-Year Plan due after October 31, 2020. In addition, HUD has not issued the AFH Assessment tool for states. As such, States are not currently required to submit an AFH, but must continue to comply with existing obligations to affirmatively further fair housing. Until the State is required to submit an AFH, it will continue to provide its AFFH Consolidated Plan Certification, and continue to report on the State's actions to address fair housing impediments in the State's Consolidated Plan Annual Performance reports, in compliance with CFR 24 91.520(a). Below is the State's summary of its planned actions to address Fair Housing Impediments<sup>1</sup>.</p> <p>Gaps in geographic coverage of non-profit fair housing agencies-Eight non-profit fair housing agencies were awarded eleven grants on January 23, 2018 (for FFY 2017) under HUD's Fair Housing Private Enforcement Initiative grants and Education and Outreach Initiative grants. While most were located in the Chicago metro area, one (Prairie State Legal Services) serves a large downstate geographic. In addition, the Metro St. Louis EHOC was funded, which also works in the Illinois part of that metro area. HUD issued an FFY 2017 NOFA for these programs in August of 2017, with applications due on October of 2017. The NOFA for FFY 2018 funding has not yet been issued.-The Illinois Department of Human Rights (IDHR), through its Fair Housing Division, provides statewide coverage, including those areas not directly serviced by a HUD Fair Housing Initiatives Program, and has offices/staff in Chicago, Springfield, and Marion. Besides processing fair housing complaints as a HUD-designated substantially equivalent agency, it also conducts presentations and training for government agencies and community-based groups regarding fair housing rights under the Illinois Human Rights Act.-IDHR and IHDA also shared fair housing information for wider circulation to other major membership organizations, including Housing Action Illinois (HAI), Supportive Housing Providers Association (SHPA), Illinois Housing Council (IHC), Rural Partners, Chicago Area Fair Housing Alliance (CAFHA), and other organizations.<sup>2</sup></p> <p>Lack of Fair Housing Knowledge-IDHR, through its Institute for Training and Development, regularly provides a schedule of related training, including "Basic Fair Housing Training for Landlords &amp; Property Managers", LGBTQ-Equal Access Requirements, and Reasonable</p> |
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| Name of Plan | Lead Organization | How do the goals of your Strategic Plan overlap with the goals of each plan?  |
|--------------|-------------------|---|
|              |                   | Accommodations Policies.-Sessions on fair housing-related topics are included in statewide conferences, including the Illinois NAHRO annual conference, Illinois Association of Housing Authorities (IAHA), Housing Action Illinois (HAI), Supportive Housing Providers Association (SHPA), Rural Partners/Illinois Institute for Rural Affairs, and others.-Illinois Realtor (fka the Illinois Association of Realtors) works jointly with IDHR on a fair housing program to publicize passage of the Fair Housing Act |

| Name of Plan                           | Lead Organization | How do the goals of your Strategic Plan overlap with the goals of each plan?  |
|--|-------------------|---|
| AFH 2 - Action to overcome impediments | State Government  | <p>3.Shortage of affordable, accessible, and suitable housing-IHDA actively pursues or develops funding and assistance options for affordable housing that serve a variety of special needs populations, including: the HUD Section 811 Project-Based Rental Assistance Demonstration; the Home Accessibility Program; the Rental Housing Support Program;Treasury's Hardest Hit Fund; and first mortgage financing programs-IHDA administers combined funding for its Permanent Supportive Housing Development Program, to better target special needs populations that also need services. This includes the national Housing Trust Fund-IHDA continues to develop and improve its Low Income Housing Tax Credit (LIHTC) Program to better serve lower-income households. Features include: enhanced accessibility (requiring twice the number of federally-required accessible housing units); Universal Design; Opportunity Areas; Community Revitalization efforts; scoring for income targeting, rental assistance, and energy conservation/green building; providing preference points to projects proposed in AHPAA communities (a State law identifying localities with less than 10% affordable housing stock); prioritizing projects that serve supportive housing populations via participation in the inter-agency Statewide Referral Network (SRN); and other areas-IHDA continues to assist Supportive Living Facilities, the state's assisted living program for elderly and persons with disabilities (via a Medicaid-approved waiver)-IHDA continues coordination with IDHS and IDoA in coordinating assistance with its Bridge Rental Subsidy Program, designed to assist class members of ADA-related court consent decrees-IHDA continues to coordinate with IDHS and local participating housing authorities which provided matching public housing and HCV units to persons with disabilities (as part of its Section 811 program)- Continues to address lead-based paint and water issues with IDPH, IEPA, IHDA, and DCEO- Continues to operate the Illinois housing search website through a third party vendor, providing real-time information on available statewide affordable housing units, monitoring for fair housing violations, and enhanced matching capability for State Referral Network (SRN) and 811 units, including those with accessible features.</p> |



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| AFH 3 - Actions to Overcome Impediments | State Government | <p>4. Improving lending and real estate practices-The Illinois Department of Financial and Professional Regulation(IDFPR) continues to regulate and monitor State-chartered banks and financial institutions, concentrating on mortgage fraud and predatory lending-The Illinois Attorney General's Office continues to engage in litigation regarding mortgage fraud and predatory lending, and continues to administer the DOJ Mortgage Foreclosure Settlement Program-IHDA continues to provide lender training to participating banks/financial institutions which participate in its homebuyer mortgage and down payment assistance programs, which continue to include a fair housing/non-discrimination component-In 2017 the Illinois General Assembly passed the Installment Sales Contract Act, a law providing key consumer protections to homeowners involved in predatory rent-to-own contracts, also known as a contract-for-deed mortgages. This benefits lower income households where a sub-prime loan is their only viable homeownership option-IHDA continues to provide credit and foreclosure prevention counseling through local agencies under its Hardest Hit Fund and Foreclosure Prevention Program, both aimed at assisting homeowners in avoiding foreclosure-IHDA continues to administer its emergency mortgage assistance program, a down payment assistance program, and a refinancing program for homeowners with underwater mortgages-Illinois Realtor has established a fair housing promotion and training section on its website, in conjunction with IDHR, to promote/commemorate the passage of the Fair Housing Act-IHDA continued to have lender, real estate, and developer representatives on its SPAR/OHCS Advisory Committee, the State's official advisory group for the HUD-required State Consolidated Plan5. Improving Enforcement-IHDA continues to include fair housing provisions in its loan and tax credit documents for approved multi-family rental housing projects. It also holds on-going training for property managers, which includes a fair housing compliance section. Specific training is done on reasonable accommodations, especially regarding persons with disabilities-IHDA also provides highlights to applicants and approved owners/developers/property managers on action steps for the Affirmative Fair Housing Marketing Plans (AFHMPs) to better evidence efforts to provide outreach efforts to reach those groups least likely to apply for affordable housing-IHDA also provides fair housing training to participating lenders under its homebuyer assistance programs (See</p> |
|---|------------------|---|

| Name of Plan                            | Lead Organization | How do the goals of your Strategic Plan overlap with the goals of each plan?   |
|---|-------------------|--|
|   |                   | Education section above)-The Illinois Department of Commerce and Economic Opportunity (DCEO) provides similar fair housing training to its CDBG local government grantees at its annual grantee administrator training, and continues providing technical assistance as needed on fair housing issues, as requested or informed IHDA continues efforts to promote projects in opportunity areas as well as community revitalization areas. With the latter, this included reviews of existing affordable housing inventory to reduce geographic concentration, and promotion of more comprehensive economic/community development in these areas.  |
| AFH 4 - Actions to Overcome Impediments | State Government  | 5. Lack of funding to address needs-This issue was discussed previously under Impediment #3 regarding the State's efforts to develop new program resources and pursue available funding opportunities-Most HUD programs have experienced major funding reductions in recent years. The recent approval by Congress and the President of the FFY 2018 appropriations bill at least temporarily reversed this trend, providing increased funding for many HUD programs, including CDBG, HOME, Emergency Solutions, HOPWA, public housing, rental assistance programs, Section 811, Section 202, and many others. This will allow State and local grantees to temporarily address the backlog and pipeline of needed affordable housing projects. IHDA continues to pursue other available funding and develop new programs to address the ever-growing affordable housing needs of the State's communities, and may apply to be designated a Community Development Financial Institution (CDFI) and/or non-profit under Treasury's Capitol Magnet Fund |

| Name of Plan                              | Lead Organization                   | How do the goals of your Strategic Plan overlap with the goals of each plan?  |
|---|-------------------------------------|---|
| Affirmatively Further Fair Housing (AFFH) | Illinois Department of Human Rights | <p>IDHR is responsible for administering the Illinois Human Right Act. IDHR takes and investigates charges of housing discrimination on the bases of race, color, religion, sex, national origin, ancestry, age (40 and over), marital status, physical, mental and perceived disability, military status, familial status (children under 18) sexual orientation (including gender identity) unfavorable military discharge, and order of protection status. Retaliation and interference with housing rights are also prohibited under the HRA. IDHR will continue its primary fair housing activity of docketing and investigating housing discrimination cases, including cases referred to IDHR from HUD's Office of Fair Housing and Equal Opportunity under a Cooperative Agreement under HUD's Fair Housing Assistance Program. Where the IDHR investigation leads to a substantial evidence finding of discrimination and conciliation is not successful, the claimant or respondent (the party alleged to have discriminated) can elect to have the case heard administratively for the Illinois Human Rights Commission, or in circuit court, in which case the Illinois Attorney General's Office represent the matter.</p> <p>Proposed Fair Housing Outreach Activities: IDHR will continue its education and outreach efforts to disseminate information about Illinois residents fair housing rights and responsibilities, and IDHR's fair housing enforcement activities, via its website, as well as workshops, seminars, speaking appearances, housing fairs, and distribution of literature through collaboration with numerous non-profit organizations. IDHR will continue to expand its outreach efforts to other state agencies in accordance with Illinois' Comprehensive Housing Plan. IDHR will provide free fair housing training at open-to-the-public sessions held on a quarterly basis for housing providers and landlords through its Institute for Training and Development. IDHR will continue working toward greater affordability and choice for state residents through it participation in the Interagency Subcommittee of the Illinois Housing Task Force, and continue working with the Chicago Area Fair Housing Alliance (CAFHA). IDHR will continue to provide training, networking opportunities and support for the regional and annual meetings of the Illinois Municipal Human Relations Association (IMHRA) on issues relation to fair housing, and to the International Association for Official Human Rights Agencies</p> |

| Name of Plan | Lead Organization | How do the goals of your Strategic Plan overlap with the goals of each plan?  |
|--------------|-------------------|---|
| AFFH (2)     | IHDA (with IDHR)  | <p>IHDA promotes fair housing in the marketing of all its financed units under the Illinois Affordable Housing Trust Fund, the LIHTC, and HOME Programs, which require affirmative marketing plans as part of their application processes. IHDA recognizes the importance of non-discriminatory practices with regard to residential property and related facilities. IHDA's goal is to promote a condition in which all individuals in the same housing market area have available a like range of housing choices. Thus, IHDA requires all multifamily projects with 5 or more HOME for Trust Fund assisted units comply with IHDA's affirmative fair housing policies and procedures. IHDA also evaluates proposals involving single-family projects with five or more HOME assisted units to determine the appropriateness of affirmative marketing efforts. The Affordable Housing Trust Fund Program requires that projects with 5 or more units financed in whole or in part for family housing must have at least 20% of the units to be at least adaptable for future accessibility improvements. Projects involving HOME or the Risk Sharing Program funding must at minimum comply with the 5% minimum accessibility requirements of Section 504 of the Rehabilitation Act of 1973. Per the Qualified Allocation Plan for LIHTCs, projects must comply with all applicable federal and State accessibility laws to receive credits. Additional project scoring points are provided for developments that provide enhanced accessibility standards. For single-family programs, fair housing provisions are discussed at IHDA-hosted local training sessions and included in each lender's procedures manual, which is signed off by each participating lender's chief executive. Lenders located in urban areas of the State also must comply with the provisions of the Home Mortgage Disclosure Act and the Community Reinvestment Act, which includes monitoring by federal bank examiners for their particular category of lending institution (Office of Thrift Supervision, Federal Reserve Bank, or Office of the Comptroller of the Currency). Under Illinois' Rental Housing Support Program, all Local Administrative Agencies and participating landlords must follow all rules governing Fair Housing and all other applicable state and federal laws, and make efforts to publicize units under the RHSP, contacting non-profit corporations in the areas a LAA covers. IHDA provides a preference to LAA applicants which target up to 30% of their requested assistance to "Special Needs Tenant"</p> |

| Name of Plan | Lead Organization  | How do the goals of your Strategic Plan overlap with the goals of each plan?  |
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| AFFH (3)     | DCEO (with IDHR)   | DCEO administers one of the four State formula grants included in the State Consolidated Plan. DCEO requires fair housing activities (to be undertaken) to be identified in each applicant local governments' application. In addition, DCEO also requires grantees to comply with applicable civil rights laws when applying for and receiving grant funds. The compliance review includes an EEO/Fair Housing review of each grantee. The agency reviews action taken to affirmatively further fair housing and compliance with Section 504 of the Rehabilitation Act of 1973. DCEO requires an explanation of local efforts at the time of application and a description of how the project will affirmatively further fair housing. DCEO will monitor the grantee's local actions to determine if existing action is sufficient in the following: * Provides Fair Housing Posters to grantees on an as needed basis. * Encourages grantees to adopt a fair housing ordinance. Finally, DCEO also funds accessibility improvements on privately-owned housing. This is accomplished through housing rehabilitation grantees under the CDBG Housing Rehabilitation Grants component |
| AFFH (4)     | Dept of Financial and Professional Regulations (with IDHR) | The Illinois Department of Financial and Professional Regulations (IDFPR) has two divisions that are involved in fair housing activities: Division of Banking and the Division of Professional Regulations.1. The Division of Banking is responsible for regulating commercial banks and residential mortgage bankers, brokers and loan originators. Regarding fair lending, most attention has focused on federal regulatory actions to better insure non-discrimination and community reinvestment.2. The Division of Professional Regulation licenses Real Estate Professionals, including real estate brokers, salespersons, and appraisers. The Division works with the other divisions to investigate claims of discriminatory real estate practices. Also the Divisions's computer system audits every real estate licensee's continuing education course work to ensure compliance with the continuing education requirements   |

| Name of Plan | Lead Organization  | How do the goals of your Strategic Plan overlap with the goals of each plan?   |
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| AFFH (5)     | Illinois Department of Insurance (with IDHR)               | <p>The Illinois Department of Insurance conducts both regulatory and consumer protection activities. In keeping with an open competition regulatory philosophy, its emphasis in the fair housing areas is on education and actual complaint resolution rather than on testing and investigation of regulatory reform of industry practices based on anecdotal evidence. In the complaint process, Departmental analysts access written complaints, documentation, and responses from the company or agent mentioned in the complaint. An analyst reviews the company's/producers actions for compliance with Illinois insurance laws and takes appropriated action if laws have been violated. All housing-related complaints are tallied and included in each company's "complaint ratio" (number of complaints per million dollars of premium)" which is made public. The Department also monitors complaint substance by company; if a complaint pattern emerged, Department officials may meet informally with the company to discuss the problem. The Department also has the authority to initiate special market conduct exams in which the company's practices are reviewed. The Department's Consumer Outreach personnel speak to various citizen groups and on radio call-in programs. The Department also provided consumer information on its website. It also takes part in the National Insurance Task force, which encouraged partnerships between insurance groups and community organizations</p> |
| AFFH (6)     | Illinois Council on Developmental Disabilities (with IDHR) | <p>The Illinois Council on Developmental Disabilities works to build the capabilities of individuals, families and communities, enabling each to become more self-sufficient through the Development Disabilities Assistance and Bill of Rights Act (federal law - "the DD Act"). ICDD programs are developed in direct response to the concerns and ideas voiced by consumers, families, service providers, policy makers and other professionals. The mission of the Council is to help lead change in Illinois so all people with developmental disabilities exercise their right to equal opportunity and freedom. ICDD strives to ensure the fair housing issues or barriers are resolved and people with disabilities have choice on housing options through its advocacy efforts and grant investments. The Council advocates individualized supports as a necessary means of allowing people to choose where and how they live in the community</p>  |

| Name of Plan | Lead Organization                          | How do the goals of your Strategic Plan overlap with the goals of each plan?   |
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| AFFH (7)     | Office of the Attorney General (with IDHR) | <p>Under the Illinois Human Rights Act (HRA) the Illinois Attorney General investigates possible fair housing violations when those violations demonstrate a pattern and practice of discrimination prohibited by the HRA. When the Attorney General has reasonable cause to believe that a person is engaged in a pattern and practice of illegal discrimination, the Attorney General may file a civil action to enforce the provisions of the HRA. Further, the Illinois Attorney General is responsible for enforcing the Environmental Barriers Act (EBA). This duty involves investigating alleged violations of the EBA and the Illinois Accessibility Code ("Code") and may include the filing of a lawsuit where necessary to ensure compliance with the EBA. The EBA and Code apply to the construction and alteration of public facilities and qualifying multi-story housing units. for purposed of housing discrimination, the Attorney General has jurisdiction over multi-story housing which is defined as "any building of for or more stories containing ten or more dwelling units, constructed to be held out for sale or lease by any persons to the public". In addition the Attorney General utilized the HRA and Fair Housing Amendment Act to pursued developers that design and construct inaccessible housing. The Attorney General also has the duty to implement the Civil and Equal Rights Enforcement Act ("CEREA"). CEREA (15 ILCS 210) gives the Attorney General power to investigate violations of laws related to discrimination and when such violations are established, to undertake necessary enforcement action. Thus the Attorney General is authorized under CEREA to investigate and if necessary litigate any housing discrimination violations that implicate the general public interest of the people of the State of Illinois. The Attorney General also conducts outreach to residents and communities throughout Illinois concerning their rights under the HRA</p> |

| Name of Plan                                       | Lead Organization      | How do the goals of your Strategic Plan overlap with the goals of each plan?  |
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| Homeless Prevention: Discharge Coordination Policy | Various State Agencies | Individual and inter-agency efforts on discharge policies are underway at many agencies, and continue in conjunction with the February 9, 2006 enactment of 24 CFR part 91.325, as reflects the requirement for all McKinney-Vento Homeless Assistance Act grantees. A certification that the state has established a policy for the discharge of persons from publicly funded institutions or systems of care (such as health care facilities, foster care, or other youth facilities, or correction programs and institutions) in order to prevent such discharge from immediately resulting in homelessness for such persons |



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| Discharge Policy (2) | Various State Agencies | <p>Under the ESG Program, the State received responses from 21 separate homeless services/shelter agencies which had submitted copies of such policies, or were developing coordinated discharge policies along with other agencies participating in their local Continuum of Care systems. A sampling of cities/areas represented (all outside of Cook County) is as follows: Springfield, Rockford, Peoria, Champaign, Quincy, Carbondale, McHenry County, Kane County, Freeport, Harrisburg, Metropolis, Danville, Olney, Highland, Princeton, Greenup, and Anna. The Illinois Department of Public Health (IDPH) operates under some eight separate State administrative rules that govern different types of hospitals, nursing homes, and assisted living facilities that it licenses or otherwise regulates. These regulations cover the following; hospitals; assisted living facilities; skilled nursing and intermediate; sheltered care; veterans homes; intermediate care for developmentally disabled; community living facilities; and skilled nursing for under age 22. All eight administrative rules include discharge policies. The Illinois Department of Healthcare and Family Services (IDHFS) reimburses Medicaid-certified nursing homes and supportive living facilities assisting living, Home and Community based services waiver option), and complies with federal regulations for these, which require such facilities to develop a post-discharge plan of care that is developed with resident and family involvement to assist a resident to adjust to a new living environment. IDOC is developing a comprehensive screening tool that will identify those offenders who have been or are at risk of being homeless at crucial quadrants of the offenders stay in the IDOC. The administration of this tool at selected intervals of the offenders stay at IDOC will better identify the unique needs of the client and more effectively prepare for the best appropriate programming upon returning to the community. The long range goal of this screening tool is to assist the offender in maintaining housing stability while in the community thereby becoming more productive and reduce recidivism. The Corporation for Supportive Housing (CSH) and IDOC continue to collaborate in attempting to establish 125 units of permanent supportive housing for the ex-offender population. Currently, CSH has been working with the Illinois Criminal Justice Authority, IDMH, and the IDOC to create a Prison DataLink (data matching software between DOC and IDMH) to better identify previous recipients of state mental health services</p> |
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| Discharge Policy (3) | Various State Agencies | <p>IDOC has incorporated the use of <a href="http://www.RentryIllinois.net">www.RentryIllinois.net</a>, <a href="http://www.illinoishousingsearch.org">www.illinoishousingsearch.org</a> and <a href="http://www.Illinoisworkforcenet.org">www.Illinoisworkforcenet.org</a> with institutional counselors, Placement Resource Unit (PRU) staff and parole agents. These websites were created by agencies and collaborative organizations that are sensitive to the barriers of housing experienced by the formerly incarcerated. These websites are statewide listings of resources tailored to the needs of the 10 high impact areas outlined in Inside/Out the Governor's Response to Reentry. IDOC and the Illinois Department of Human Services (IDHS) Division of Mental Health (DMH) continue discussions concerning the housing needs of ex-offenders with mental health issues through the DMH Projects for Assistance in Transition From Homeless (PATH) program. PATH is a case management project funded through SAMHSA and administered in Illinois through DMH. This collaboration attempts to provide case management supports to ex-offenders in the community that meet the criteria for participation. IDOC and IDHS-DMH are addressing this collaboration to examine ways to traverse the barriers of long term housing needs for ex-offenders with mental illness. DHS-DMH/ PATH Program has collaborated with IDOC and piloted the PATH Ex-Offender Reentry Initiative at two correctional facilities. This initiative refers offenders with mental disorders that are at risk of homelessness to the PATH providers prior to release from the institution. Depending on the length of pre-release interaction, the PATH providers begin to link the offender to community services. PATH continued involvement with the offender in the community is determined by the need of the offender and the severity of the disorder. In Cook County, the Countywide Discharge Planning Committee has been meeting regularly. The Committee has been assisting in increasing access to mainstream benefits by promoting SOAR Training (SSI/SSDI Outreach, Access, and Recovery). A two-day training was successfully held in August. Additionally the committee has been evaluating and discussing how the Federal Strategic Plan to Prevent and End Homelessness will affect discharge and re-entry planning in the coming years. An Interagency Subcommittee of the Illinois Housing Task Force convenes quarterly. The purpose of this subcommittee is to allow State agencies that provide housing development dollars as well as services funding the opportunity to work together to better service the priority populations of the Annual Comprehensive Housing Plan</p> |
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| Name of Plan             | Lead Organization                               | How do the goals of your Strategic Plan overlap with the goals of each plan? |
|--------------------------|---|--|
| Narrowing Digital Divide | Department of Commerce and Economic Opportunity |  |

Table 3 - Other local / regional / federal planning efforts

## Narrative

IHDA's Strategic Planning and Reporting/Office of Housing Coordination Services provides coordination between State agencies, with statewide trade and membership organizations, regional and local agencies, and local governments. Its Advisory Committee is represented by these groups as well as non-profit organizations, realtors, developers, builders, and other private industry officials, and meets quarterly. In Illinois, there are 40 CDBG Entitlement communities (plus the State-DCEO) that are responsible for either submitting their own local Consolidated Plan, or are covered by another local Consolidated Plan. As such, these local governments are not covered by the State Consolidated Plan, but are responsible for carrying out their own separate housing strategies. Likewise, local governments that are not Entitlements under CDBG but which apply for funding directly to HUD under other programs are responsible for submitting an abbreviated local Consolidated Plan which they would be responsible for carrying out.

The State and HUD have held occasional workshops since 1992 with local CDBG Entitlement grantees to discuss Consolidated Plan requirements and the availability of relevant information and resources from State agencies and other sources. The relationship between the State and local governments in Illinois is clearly defined in the State Constitution. Those municipalities in Illinois which have Home Rule status (211 municipal units, plus Cook County) have liberal powers. There is a strong sense in Illinois that these powers should not be weakened by the development generally of State regulation. As such, the State Consolidated Plan does not mandate action at the local level; rather the State Consolidated Plan indicates its support for applications by other entities, such as local governments and non-profit and for-profit organizations. For various federal programs administered at the State level (such as CDBG, HOME, and Emergency Solutions Grants), qualifying local governments are generally eligible applicants and can act as sub recipients of funding. Local governments that are covered by the State Consolidated Plan (those that do not have to do a local or abbreviated Consolidated Plan) and which receive funds under the State (CDBG, HOME, and Emergency Shelter Grants) formula grant programs are assisting the State in carrying out its strategy.

SPAR/OHCS coordinates other activities with local governments and agencies primarily through statewide associations and local meetings. Presentations of meetings and provision of newsletter articles have been given to the Illinois Municipal League, Illinois Association of Regional Councils, Illinois Association of Housing Authorities, the Illinois Chapter of the National Association of Housing and Redevelopment Officials (NAHRO) and Rural Partners, among others. Finally, local governments are routinely invited to attend major program-related workshops, public hearings and conferences held or coordinated by IHDA and DCEO. IHDA also works closely with regional chapters of these larger organizations, such as the Metropolitan Mayors Caucus of the Illinois Municipal League and the Metropolitan Planning Council

## **AP-12 Participation - 91.115, 91.300(c)**

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

#### The Citizen Participation Plan

The Public Comment period began Tuesday, May 29, 2018 and ended Thursday, June 28, 2018. The State held one public hearing on Thursday, June 21, 2018 at 10:00 A.M. in Springfield. The Public Comment period and Hearing ran concurrently with the Public Comments period for a substantial amendment to the prior, 2010-2014 Consolidated Plan, regarding the HOPWA program administered by the Illinois Department of Public Health

- A 2018 Public Notice was mailed to 35 statewide housing-related agencies or organizations, a number of which included announcement of same in a newsletter or mailing sent to their membership. Copies were sent to the members of the OHCS Advisory Committee and CDBG Entitlement Grantees.
- The Public Notice was published prior to the hearing in the following ten (10) newspapers: the *Belleville News-Democrat*; the *Breeze-Courier*; the *Champaign News Gazette*; the *Daily Southtown*; the *Evansville Courier Press*; the *Peoria Journal-Star*; the *Rockford Register-Star*; the *Rock Island Argus-The Dispatch*; the *Southern Illinoisian*; and the *Springfield State Journal Register*.
- DCEO sent notice of the public hearing to CDBG-eligible units of general local government.
- DCEO carried out additional activities on the State CDBG Citizen Participation Plan.
- Electronic copies of the draft Consolidated Plan-2018 Action Plan - were sent to the OHCS Advisory Committee, State Agencies Housing Committee, Illinois Housing Task Force, Affordable Housing Trust Fund Advisory Commission, Community Development Block Grant (CDBG) Entitlement grantees, Community Action Agencies, Regional Planning Commissions, Public Housing Authorities and other groups. The draft plan was also posted on IHDA's website at [www.ihda.org](http://www.ihda.org). Additional electronic and hard copies of the draft Consolidated Plan-2018 Action Plan were sent to interested parties as requested
- The public hearing was held Thursday June 21, during the 30-day public comments period. The June 21 date for the hearing was also posted on IHDA's web-site
- All notices and agendas clearly stated that each site was accessible for persons with disabilities. IHDA made reasonable efforts to accommodate persons with sight-and hearing-impaired disabilities, as well as for significant groups of Non-English speaking residents.

- One public comments letter was received during the public comments period.
- The development of both the Citizen Participation Plan and Consolidated Plan provided more than ample opportunity for the public to provide comments.

All material comments made at the public hearing and in writing have been addressed

**Citizen Participation Outreach**

| Sort Order | Mode of Outreach | Target of Outreach           | Summary of response/attendance   | Summary of comments received   | Summary of comments not accepted and reasons  | URL (If applicable) |
|------------|------------------|------------------------------|--|--|---|---------------------|
| 1          | Public Meeting   | Non-targeted/broad community | The public hearing was held Thursday, June 21, 2018 in Springfield. The meeting began with a presentation on housing activities in the Consolidated Plan, an historical overview of the Consolidated Plan development process, a description of the Action Plan content, anticipated funding levels, and all major proposed changes to the five HUD formula grant programs (CDBG, HOME, ESG, HOPWA and HTF). The audience was then invited to provide testimony and comments | The Public Hearing began with a presentation on housing activities in the Consolidated Plan, an historical overview of the Consolidated Plan development process, a description of the Action Plan content, anticipated funding levels, and all major proposed changes to the five HUD formula grant programs (CDBG, HOME, ESG, HOPWA and HTF). The audience was then invited to provide testimony and comments. | Not Applicable. During the public hearing, comments by a member of the public expressed support for IHDA programs |                     |



| Sort Order | Mode of Outreach  | Target of Outreach           | Summary of response/attendance   | Summary of comments received  | Summary of comments not accepted and reasons | URL (If applicable)                                   |
|------------|-------------------|------------------------------|--|---|--|---|
| 2          | Newspaper Ad      | Non-targeted/broad community | Generally, response to newspaper ads will result in attendance at the public hearing, or written letter response or email  | One public comments letter was received. See appendix for letter and written response | Not applicable                               | <a href="http://www.ihda.org">http://www.ihda.org</a> |
| 3          | Internet Outreach | Non-targeted/broad community | Generally, response to internet outreach will result in attendance at the public hearing, or written letter response or email  | One public comments letter was received   | Not applicable                               | <a href="http://www.ihda.org">http://www.ihda.org</a> |
| 4          | Public Meeting    | Non-targeted/broad community | Meetings of the Office of Housing Coordination Services (OHCS) Advisory Committee, providing a status update on Consolidated Plan activities under the four HUD formula grant programs | Minutes of the quarterly Advisory Committee Meetings are available upon request       | Not applicable. All comments were considered |   |

**Table 4 – Citizen Participation Outreach**



## Expected Resources

## **AP-15 Expected Resources – 91.320(c)(1,2)**

### **Introduction**

### **Anticipated Resources**

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| Program | Source of Funds | Uses of Funds | Expected Amount Available Year 1 |                    |                          |           | Expected Amount Available Remainder of ConPlan \$ | Narrative Description |
|---------|-----------------|---------------|----------------------------------|--------------------|--------------------------|-----------|---|-----------------------|
|         |                 |               | Annual Allocation: \$            | Program Income: \$ | Prior Year Resources: \$ | Total: \$ |   |                       |
|         |                 |               |                                  |                    |                          |           |   |                       |

|      |                  |  |            |   |   |            |   |  |
|------|------------------|--|------------|---|---|------------|---|--|
| CDBG | public - federal | Acquisition<br>Admin and Planning<br>Economic Development<br>Housing<br>Public Improvements<br>Public Services | 29,192,836 | 0 | 0 | 29,192,836 | 0 | Grant funds available through the CDBG Community Development Block Grant Program are available to non-entitlement cities and counties on a competitive basis. Assistance can include: Housing Rehabilitation, Public Infrastructure improvements, and Economic Development among other activities. Beginning in 2017, the 3rd year of the 2015-2019 Consolidated Plan, CDBG funds will also provide funds for Disaster Response on an as-needed basis for communities affected by an unforeseen event declared as a Disaster by the Governor of the State of Illinois; and address Lead Remediation through a Pilot Project in the local target area of Galesburg, Illinois. Additionally beginning in 2017, the State will address requirements necessary to remedy HUD's 2013 Monitoring Finding concerning the Revolving Loan Fund program. HUD regulations provide that 3% of the CDBG allocation and Program income plus \$100,000 can be used for Administration and Technical |
|------|------------------|--|------------|---|---|------------|---|--|

| Program | Source of Funds  | Uses of Funds   | Expected Amount Available Year 1 |                    |                          |            | Expected Amount Available Remainder of ConPlan \$ | Narrative Description  |
|---------|------------------|---|----------------------------------|--------------------|--------------------------|------------|---|--|
|         |                  |   | Annual Allocation: \$            | Program Income: \$ | Prior Year Resources: \$ | Total: \$  |   |  |
|         |                  |   |                                  |                    |                          |            |   | Assistance for the State-administered program. In 2019, this will equate to at least \$975,785 and may grow depending on program income received. Any funds not utilized for Administration will be re-programmed for other CDBG eligible purposes.  |
| HOME    | public - federal | Acquisition<br>Homebuyer assistance<br>Homeowner rehab<br>Multifamily rental new construction<br>Multifamily rental rehab<br>New construction for ownership<br>TBRA | 15,391,165                       | 10,587,726         | 0                        | 25,978,891 | 0   | Per HUD's guidelines IHDA no longer operates on a FIFO but by Grant Based Accounting. The deadline for committing program income, repayments and recaptured funds received during a program year is the date of the P.J.'s commitment deadline for the subsequent year's grant allocation therefore the program income listed here is 2017 Program Income which has the same deadline as 2018 Grant Funds. |

| Program | Source of Funds  | Uses of Funds   | Expected Amount Available Year 1 |                    |                          |           | Expected Amount Available Remainder of ConPlan \$ | Narrative Description  |
|---------|------------------|---|----------------------------------|--------------------|--------------------------|-----------|---|--|
|         |                  |   | Annual Allocation: \$            | Program Income: \$ | Prior Year Resources: \$ | Total: \$ |   |  |
| HOPWA   | public - federal | Permanent housing in facilities<br>Permanent housing placement<br>Short term or transitional housing facilities<br>STRMU<br>Supportive services<br>TBRA | 1,734,635                        | 0                  | 0                        | 1,734,635 | 0   | HOPWA funds will be used to provide short term mortgage, utility tenant based assistance, facility based rental assistance and security deposits. In addition funding will provide operating costs, repair/rehab and supportive services to persons residing in housing facilities around the State. |



| Program | Source of Funds  | Uses of Funds   | Expected Amount Available Year 1 |                    |                          |           | Expected Amount Available Remainder of ConPlan \$ | Narrative Description   |
|---------|------------------|---|----------------------------------|--------------------|--------------------------|-----------|---|---|
|         |                  |   | Annual Allocation: \$            | Program Income: \$ | Prior Year Resources: \$ | Total: \$ |   |   |
| ESG     | public - federal | Conversion and rehab for transitional housing<br>Financial Assistance<br>Overnight shelter<br>Rapid re-housing (rental assistance)<br>Rental Assistance<br>Services<br>Transitional housing | 4,935,064                        | 0                  | 0                        | 4,935,064 | 0   | ESG funds are used for street outreach, emergency shelter, homeless prevention, rapid rehousing, HMIS, and administration |

| Program | Source of Funds  | Uses of Funds  | Expected Amount Available Year 1 |                    |                          |           | Expected Amount Available Remainder of ConPlan \$ | Narrative Description   |
|---------|------------------|--|----------------------------------|--------------------|--------------------------|-----------|---|---|
|         |                  |  | Annual Allocation: \$            | Program Income: \$ | Prior Year Resources: \$ | Total: \$ |   |   |
| HTF     | public - federal | Acquisition<br>Admin and Planning<br>Homebuyer assistance<br>Multifamily rental new construction<br>Multifamily rental rehab<br>New construction for ownership | 8,575,518                        | 0                  | 0                        | 8,575,518 | 0   | Provides affordable rental housing for households at 30% AMI or below                                 |
| Other   | public - federal | Admin and Planning<br>Public Improvements  | 500,000                          | 0                  | 0                        | 500,000   | 0   | \$500,000 from repayment of IKE<br>Disaster funding will be available for reuse in program year 2019. |

Table 5 - Expected Resources – Priority Table

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

Generally, permanent, non-federal sources of funds that are non-refundable contributions from State or local government, or private sources, will be eligible to qualify as a matching contribution. Refer below for more specific information by program

### **Acceptable Sources of HOME Match**

- Local or State general revenues
- Housing trust funds
- Foundations, donations
- Program income from HODAG, RRP or UDAG only after grant closeout
- Value of waived taxes, fees, or charges
- Appraisal value of land or real property not acquired with Federal Funds
- Difference between appraised value and acquisition cost, if property is acquired with Federal funds
- Grant equivalent of below market
- Interest rate loans to the project
- The cost of investments, not made with federal resources, in on and off-site infrastructure that is directly required for the affordable housing assisted with HOME funds
- Federal Home Loan Bank grants
- Value of donated material or labor
- Direct cost of supportive services that facilitate independent living or as part of a self-sufficiency program
- Direct cost of homebuyer counseling for families that complete a HOME assisted purchase

### **Unacceptable Sources of HOME Match**

- All federal funds, including CDBG funds, Rental Rehabilitation Program, Homeless Housing programs, Weatherization, etc.
- Value attributable to federal tax credits
- The interest rate subsidy attributable to the federal tax exemption on financing
- Owner equity or investment in a project
- Cash or other forms of contributions from investors, applicants for, or recipients of HOME assistance or contracts
- Expenditures on Program Administration

**ESG:** Each grant recipient must supplement its Emergency Solutions Grant funds with an equal or greater amount of funds from other sources. 25% of the match must be cash. The amount available for matching fund purposes must be injected during the grant period.

Acceptable sources of ESG match are the State of Illinois DHS Homeless Prevention and Emergency & Transitional Housing Programs, Community Services Block Grant, FEMA, and any other source including any Federal source other than the ESG program. If ESG funds are used to satisfy the matching requirements of another Federal program, then funding from that program may not be used to satisfy the ESG matching requirements. Matching contributions must meet all requirements that apply to ESG funds, the funds must be provided after the date that HUD signs the grant agreement, cash contributions must be expended with the expenditure deadline and noncash contributions must be made within the expenditure deadline. The matching requirement may be met by cash contributions and/or noncash contributions

**CDBG/Community Development Block Grant Program:**

The State must match all but \$100,000 of the funds received for program administration. Public Infrastructure grants may be used to fund Construction only and other costs must be locally funded unless determined to be an economic hardship. Economic Development grants must be matched (at a minimum) dollar for dollar. Housing Rehabilitation grants do not require leverage.

**Housing Trust Fund:** For the national HTF, Projects which are able to commit other non-federal funds as part of their project financing will be given additional consideration. There is no State or local match requirements for the national HTF, but IHDA anticipates most national HTF-funded projects will be highly leveraged

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

Individual State Agencies are not authorized to acquire/own real property. The Illinois Department of Central Management Services (CMS) is responsible for ownership and management of State facilities. Uses are statutorily limited and do not currently include affordable housing

**Discussion**

The Authority's HOME Program generates program income from two sources: interest income and loan repayment/recaptured funds. Because of Grant Based Accounting, FY 2018 Program Income and the FY 2019 HOME Grant will have the same commitment deadline. Also Program Income must be fully disbursed before Treasury funds if committed to the same activity. There is a balance of \$10,587,726 in program income for PY 2018 as of December 31, 2018. Ten percent of program income minus recapture will be made available for administrative. Ten percent of the 2019 HOME allocation will be made available for administrative costs which is \$1,539,116 for PY 2019.

The State's leveraging strategy includes the coordination of Low Income Housing Tax Credits (LIHTCs) with the development of housing that is affordable to low-income and moderate-income families. As the State's LIHTC allocating agency, IHDA coordinates the development of the annual Qualified Allocation Plan (QAP). Besides the program's already statutory targeting to households at 60% of area median income or below, IHDA has built a number of factors into its application scoring system to incentivize better targeting to lower income households. These include the following point categories: Rental Assistance; Larger Units; Green Building (lower utility bills); Rehabilitation (of existing housing); Community Revitalization Plans; 30% AMI Housing (10-15%); and Statewide Referral Network (SRN) units, which target 10-15% of a property's units to persons/households who are homeless/at-risk of homelessness or have a disability. All of these scoring criteria are aimed at incentivizing project applications which include deeper targeting to low-and moderate-income families

## Annual Goals and Objectives

### AP-20 Annual Goals and Objectives – 91.320(c)(3)&(e)

#### Goals Summary Information

| Sort Order | Goal Name                                   | Start Year | End Year | Category           | Geographic Area        | Needs Addressed    | Funding            | Goal Outcome Indicator   |
|------------|---|------------|----------|--------------------|------------------------|--------------------|--------------------|--|
| 1          | Multifamily Affordable Housing              | 2015       | 2019     | Affordable Housing | Statewide Distribution | Affordable Housing | HOME: \$15,391,165 | Rental units constructed: 28 Household Housing Unit<br>Rental units rehabilitated: 19 Household Housing Unit |
| 2          | Single Family Owner Occupied Rehabilitation | 2015       | 2019     | Affordable Housing | Statewide Distribution | Affordable Housing | CDBG: \$6,500,000  | Homeowner Housing Rehabilitated: 130 Household Housing Unit  |
| 3          | Provide emergency shelter to homeless       | 2015       | 2019     | Homeless           | Statewide Distribution | Homelessness       | ESG: \$2,300,000   | Homeless Person Overnight Shelter: 16000 Persons Assisted  |
| 4          | Prevent Homelessness                        | 2015       | 2019     | Homeless           |                        |                    |                    |  |
| 5          | Rapid Rehousing of Homeless                 | 2015       | 2019     | Homeless           | Statewide Distribution | Homelessness       | ESG: \$2,000,000   | Tenant-based rental assistance / Rapid Rehousing: 2000 Households Assisted                                   |
| 6          | Street Outreach to Homeless                 | 2015       | 2019     | Homeless           | Statewide Distribution | Homelessness       | ESG: \$120,000     | Other: 1500 Other  |

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| Sort Order | Goal Name  | Start Year | End Year | Category                            | Geographic Area        | Needs Addressed                    | Funding            | Goal Outcome Indicator  |
|------------|--|------------|----------|-------------------------------------|------------------------|------------------------------------|--------------------|---|
| 7          | Housing for Persons with HIV/AIDS                  | 2015       | 2019     | Non-Homeless Special Needs          | Statewide Distribution | Special Needs                      | HOPWA: \$1,734,635 | Tenant-based rental assistance / Rapid Rehousing: 87 Households Assisted<br>Homelessness Prevention: 375 Persons Assisted<br>HIV/AIDS Housing Operations: 73 Household Housing Unit |
| 8          | HOPWA Housing Facilities Rehabilitation and Repair | 2015       | 2019     | Homeless Non-Homeless Special Needs |                        | Special Needs                      |                    |   |
| 9          | Public Infrastructure Activities                   | 2015       | 2019     | Non-Housing Community Development   |                        | Community and Economic Development | CDBG: \$15,000,000 | Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 14000 Persons Assisted   |
| 10         | Economic Development                               | 2015       | 2019     | Non-Housing Community Development   |                        | Community and Economic Development | CDBG: \$4,000,000  | Jobs created/retained: 114 Jobs<br>Businesses assisted: 4<br>Businesses Assisted  |
| 11         | Disaster Response Program                          | 2017       | 2019     | Non-Housing Community Development   |                        | Community and Economic Development | CDBG: \$2,000,000  | Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 1 Persons Assisted   |
| 12         | HELP (Lead) Pilot Project                          | 2017       | 2019     | Lead Remediation                    |                        | Community and Economic Development | CDBG: \$0          | Homeowner Housing Rehabilitated: 0 Household Housing Unit   |

| Sort Order | Goal Name                         | Start Year | End Year | Category                          | Geographic Area        | Needs Addressed                    | Funding          | Goal Outcome Indicator   |
|------------|-----------------------------------|------------|----------|-----------------------------------|------------------------|------------------------------------|------------------|--|
| 13         | Revolving Loan Fund Activities    | 2017       | 2019     | Non-Housing Community Development |                        | Community and Economic Development | CDBG: \$0        | Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 0 Persons Assisted    |
| 14         | National Housing Trust Fund Goals | 2016       | 2019     | Affordable Housing                | Statewide Distribution | Affordable Housing                 | HTF: \$8,575,518 | Rental units constructed: 16<br>Household Housing Unit<br>Rental units rehabilitated: 10<br>Household Housing Unit |

Table 6 – Goals Summary

## Goal Descriptions

|   |                  |   |
|---|------------------|---|
| 1 | Goal Name        | Multifamily Affordable Housing  |
|   | Goal Description | Goals are determined by dividing multifamily allocation by per unit cost to determine the number of multifamily HOME units rehabbed or newly constructed. |



|          |                         |  |
|----------|-------------------------|--|
| <b>2</b> | <b>Goal Name</b>        | Single Family Owner Occupied Rehabilitation  |
|          | <b>Goal Description</b> | <p>CDBG Housing Rehabilitation Program goals are determined by dividing the program budget of \$6,500,000 by the grant ceiling of \$500,000 to equal 13 grants, multiplied by the anticipated number of homes (10) that can be served at the maximum budget amount per home (\$50,000).</p> <p>HUD regulations provide that 3% of the CDBG allocation plus \$100,000 can be used for administration and technical assistance for the State-administered program. In 2017, this equates to at least \$975,785 but may increase depending on Program Income</p> <p>In case of emergency, the Department of Commerce and Economic Opportunity reserves the right to change allocations to address specific needs of the communities affected.</p> <p>Beginning in 2017 and ending in 2019;</p> <p>The HELP (Help Eliminate Lead Program) Pilot Program-Project in the local target area of Galesburg Illinois to address elevated blood lead levels in children</p> |
| <b>3</b> | <b>Goal Name</b>        | Provide emergency shelter to homeless  |
|          | <b>Goal Description</b> |  |
| <b>4</b> | <b>Goal Name</b>        | Prevent Homelessness   |
|          | <b>Goal Description</b> | ESG will not be funding this program for Fiscal Year 2019. Funding from 2017 will be allowed to service clients for 24 month period.   |
| <b>5</b> | <b>Goal Name</b>        | Rapid Rehousing of Homeless  |
|          | <b>Goal Description</b> |  |
| <b>6</b> | <b>Goal Name</b>        | Street Outreach to Homeless  |
|          | <b>Goal Description</b> | Street Outreach to Homeless estimated to be 1,500  |

|   |                         |   |
|---|-------------------------|---|
| 7 | <b>Goal Name</b>        | Housing for Persons with HIV/AIDS   |
|   | <b>Goal Description</b> |   |
| 8 | <b>Goal Name</b>        | HOPWA Housing Facilities Rehabilitation and Repair  |
|   | <b>Goal Description</b> | <p>The rehabilitation and repair scope of services were not completed in 2018 due to delays in the process for environmental reviews that required to be completed before grantee's begin repairs to facilities. The Program aggressively sought a responsible entity to conduct the mandated environmental review but received several no responses from a list of Providers. Central management Services (CMS) requested that vendors must be selected and approved through BidBuy for the Rehab work. It was not until February of 2019 that vendor was reviewed at a negotiated cost that was approved. Anderson Environmental was approved to conduct the Environmental Review on February 28, 2019, which did not afford the grantees enough time to complete the rehabilitation and repair scope of service. The Program is requesting that grantees be allowed to fulfill the rehabilitation and repair work during the period of July 1, 2019 -June 30, 2020. Given this time frame, grantees would be able to complete their scope of service and issue reimbursements by the end of June 30, 2010.</p> |
| 9 | <b>Goal Name</b>        | Public Infrastructure Activities  |
|   | <b>Goal Description</b> | <p>The number of persons served for the Public Infrastructure program is calculated by dividing the program budget of \$15,000,000 by the grant ceiling of \$500,000; equating to 30; and then multiplying by the average number of persons served by each Public Infrastructure grant (500); equaling 14,000.</p> <p>HUD regulations provide that 3% of the CDBG allocation and Program income plus \$100,000 can be used for Administration and Technical Assistance for the State-administered program. In 2018, this will equate to at least \$975,785 and may grow depending on program income received. Any funds not utilized for Administration will be re-programmed for other CDBG eligible purposes.</p> <p>In case of emergency, the Department of Commerce and Economic Opportunity reserves the right to change allocations to address specific needs of the communities affected.</p>  |

|           |                         |   |
|-----------|-------------------------|---|
| <b>10</b> | <b>Goal Name</b>        | Economic Development  |
|           | <b>Goal Description</b> | <p>The number of persons and businesses served for the Economic Development program is calculated by dividing the program budget of \$4,000,000 by the grant ceiling of \$1,000,000; equating to 4 businesses; and then multiplying by the maximum federal jobs to dollars ratio of \$1 to \$35,000; equaling 114.</p> <p>HUD regulations provide that 3% of the CDBG allocation and Program income plus \$100,000 can be used for Administration and Technical Assistance for the State-administered program. In 2018, this will equate to at least \$975,785 and may grow depending on program income received. Any funds not utilized for Administration will be re-programmed for other CDBG eligible purposes.</p> <p>In case of emergency, the Department of Commerce and Economic Opportunity reserves the right to change allocations to address specific needs of the communities affected.</p> <p>Beginning in 2017 and ending in 2019:</p> <p>Revolving Loan Fund Activities to address requirements necessary to comply with HUD Revolving Loan Fund Program monitoring</p> |
| <b>11</b> | <b>Goal Name</b>        | Disaster Response Program   |
|           | <b>Goal Description</b> | <p>Beginning in 2017 and ending in 2019; the Disaster Response Program will provide funds for Disaster Response on an as-needed basis for communities affected by an unforeseen event declared a Disaster by the Governor. As there is no way to predict when and where a disaster will strike, anticipated outcomes are not available and are charted by a placeholder of "1".</p>   |

|           |                         |  |
|-----------|-------------------------|--|
| <b>12</b> | <b>Goal Name</b>        | HELP (Lead) Pilot Project  |
|           | <b>Goal Description</b> | The Help Eliminate Lead Program (HELP) Pilot Project is being conducted in the targeted community of Galesburg, IL. EPA data indicates the city has one of the nation's most persistent lead problems, exceeding the federal lead-action level for lead in their potable water system in 22 out of 30 sampling periods since 1992. In addition, one in 20 children under the age of six in the County have elevated blood lead levels. DCEO is addressing this issue through the implementation of the Help Eliminate Lead Program (HELP) Pilot Project. HELP is a cross-agency initiative to reduce children's exposure to lead and lessen the number of children in Illinois who suffer from its detrimental health effects. This program will be done in cooperation with an IEPA project to assist the community in replacing water lead-service lines. The results of this pilot project will help Illinois provide a comprehensive lead hazard control program to low-income families who occupy substandard pre-1978 privately-owned housing throughout Illinois. DCEO Community Development Block Grant (CDBG) funds provided \$500,000 from 2016 funds for the program. The pilot project is ongoing but no additional funding is allocated for 2019. |
| <b>13</b> | <b>Goal Name</b>        | Revolving Loan Fund Activities   |
|           | <b>Goal Description</b> | During the State's 2013 Monitoring Review, HUD determined that DCEO failed to demonstrate eligible use of Revolving Loan Funds by Units of Local Governments. Based upon CPD Notice 04-11 and Part 570, HUD advised the State to close inactive Revolving Loan Fund Accounts; and in those that are still revolving verify that the use of such funds is eligible, per the original intent of the RLF that was formed. In order to meet these requirements and remedy HUD's 2013 Monitoring Finding, the State is closing locally held Revolving Loan Funds in a manner where funds may be used for other CDBG-eligible activities. HUD has provided technical assistance to the State to navigate this process. No funding from the 2019 allocation will be used for this project, but activities will take place.  |
| <b>14</b> | <b>Goal Name</b>        | National Housing Trust Fund Goals  |
|           | <b>Goal Description</b> | Provides affordable rental housing rehab and new construction for households at 30% AMI or below   |



## AP-25 Allocation Priorities – 91.320(d)

### Introduction:

HUD regulations provide that 3% of the CDBG Allocation and Program Income plus \$100,000 can be used for Administration and Technical Assistance for the State administered program. In 2019, this will equate to at least \$975,785 and may increase based on Program Income.

2019 Funding Allocations are as follows;

CDBG \$29,192,836

HOME \$15,391,165

ESG \$4,935,064

HOPWA \$1,734,635

HTF \$8,575,518

### Funding Allocation Priorities

|      | Multi<br>family<br>Affordable<br>Housing<br>(%) | Single<br>Family<br>Owner<br>Occupied<br>Rehabilita<br>tion (%) | Provid<br>e<br>emerg<br>ency<br>shelter<br>to<br>homel<br>ess (%) | Prevent<br>Homeles<br>sness (%) | Rapid<br>Rehou<br>sing of<br>Homel<br>ess (%) | Street<br>Outre<br>ach to<br>Home<br>less<br>(%) | Housi<br>ng for<br>Perso<br>ns<br>with<br>HIV/A<br>IDS<br>(%) | HOPWA<br>Housing<br>Facilities<br>Rehabilit<br>ation and<br>Repair<br>(%) | Public<br>Infrastru<br>cture<br>Activities<br>(%) | Economi<br>c<br>Develop<br>ment (%) | Disast<br>er<br>Respo<br>nse<br>Progr<br>am<br>(%) | HEL<br>P<br>(Lea<br>d)<br>Pilot<br>Proj<br>ect<br>(%) | Revol<br>ving<br>Loan<br>Fund<br>Activit<br>ies (%) | Natio<br>nal<br>Housi<br>ng<br>Trust<br>Fund<br>Goals<br>(%) | Tot<br>al<br>(%) |
|------|---|---|---|---------------------------------|---|--|---|---|---|-------------------------------------|--|---|---|--|------------------|
| CDBG | 0   | 24  | 0   | 0                               | 0   | 0  | 0   | 0   | 54  | 14                                  | 8  | 0   | 0   | 0  | 100              |

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|                      |     |   |    |   |    |   |     |   |     |   |   |   |   |     |
|----------------------|-----|---|----|---|----|---|-----|---|-----|---|---|---|---|-----|
| HOME                 | 100 | 0 | 0  | 0 | 0  | 0 | 0   | 0 | 0   | 0 | 0 | 0 | 0 | 100 |
| HOPWA                | 0   | 0 | 0  | 0 | 0  | 0 | 100 | 0 | 0   | 0 | 0 | 0 | 0 | 100 |
| ESG                  | 0   | 0 | 51 | 0 | 45 | 4 | 0   | 0 | 0   | 0 | 0 | 0 | 0 | 100 |
| HTF                  | 100 | 0 | 0  | 0 | 0  | 0 | 0   | 0 | 0   | 0 | 0 | 0 | 0 | 100 |
| Other<br>CDBG-<br>DR | 0   | 0 | 0  | 0 | 0  | 0 | 0   | 0 | 100 | 0 | 0 | 0 | 0 | 100 |

Table 7 – Funding Allocation Priorities

### Reason for Allocation Priorities

Funding percentages for ESG homeless priorities are determined in consultation with Illinois Continuum of Care organizations.

Regarding HOME funds: IHDA has maintained a significant pipeline of affordable rental housing projects seeking HOME assistance. Homeownership and additional non-CDBG single-family rehabilitation activities are funded by IHDA with non-federal State resources

Regarding national HTF Funds: HTF Funding provides rental assistance for families at 30% AMI or below.

HOPWA funding only serves people living with HIV/AIDS that are currently housed and with a household income at 80 percent or below of the area medium income. Funding will be provided to eight housing facilities that provide emergency shelter for homeless persons living with HIV/AIDS. HOPWA and Ryan White Part B funds provide a safety net for persons living with HIV/AIDS to move or maintain long-term, stable living situations. The State of Illinois HOPWA program plans to extend the use of its funding to provide other housing options that can be used throughout the state of Illinois if funds are available. IDPH would like to use funds in the service category of facility-Based Housing Assistance. These funds will be used for community residential facilities including community residential, Single Room Occupancy (SRO) dwellings, short-term facility, project based rental units and master leased units serving low income individuals with HIV/AIDS. In addition, HIV Care Connect Region has expressed interest in pursuing Tenant-Based Rental Assistance. Housing Facilities have also expressed interest in receiving funding for needed repairs and rehab.

Total requests for CDBG Public Infrastructure program funding average more than 5 times the amount available. Economic Development grant opportunities are decreasing with the lack of State funding. More communities are exploring the Housing Rehabilitation program to fill the gap in affordable housing. Activities addressing emergencies will be separated out as Disaster Response to address CPD Notice 17-06. The Help

Eliminate Lead Program (HELP) Pilot Project is ongoing in the targeted community of Galesburg, IL. EPA data indicates the city has one of the nation's most persistent lead problems, exceeding the federal lead-action level in 22 out of 30 sampling periods since 1992. In addition, one in 20 children under the age of six in the County have elevated blood lead levels. DCEO is addressing this issue through the implementation of the Help Eliminate Lead Program (HELP) Pilot Project

Not all priorities are funded over all five years of the Consolidated Plan.

**How will the proposed distribution of funds will address the priority needs and specific objectives described in the Consolidated Plan?**

All HOME funding will result in increased affordable renter opportunities across the State

All national HTF funding will result in increased affordable renter opportunities for households at or below 30% AMI, across the State

CDBG Housing Rehabilitation Activities will result in the preservation of affordable housing in non-entitlement areas of the State

The Statewide Homeless Continua of Care use ESG funds in combination with HUD Continuum of Care funds and a variety of Federal and State mainstream resources to prevent and end homelessness. The State of Illinois will continue to meet with the Illinois Continua, as well as study their data and their determinations of the 'right mix' of funding allocation for the priority needs.



## AP-30 Methods of Distribution – 91.320(d)&(k)

### Introduction:

Below are the Methods of Distribution from the eligible program activities under the CDBG, HOME, ESG, HOPWA and HTF programs.

### Distribution Methods

**Table 8 - Distribution Methods by State Program**

|          |  |   |
|----------|--|---|
| <b>1</b> | <b>State Program Name:</b>   | CDBG Disaster Response Program  |
|          | <b>Funding Sources:</b>  | CDBG-DR   |
|          | <b>Describe the state program addressed by the Method of Distribution.</b> | In response to CPD Notice 17-06, this as-needed program is designed for communities affected by an unforeseen event resulting in a State Disaster Declaration by the Governor of the State of Illinois. |

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| <p><b>Describe all of the criteria that will be used to select applications and the relative importance of these criteria.</b></p> | <p><b><u>ELIGIBILITY THRESHOLDS</u></b></p> <p>Projects must meet the following minimum thresholds:</p> <ol style="list-style-type: none"> <li>1. Application must be for an area included in a Disaster Declaration by the Governor of the State of Illinois.</li> <li>2. The community must be unable to finance the activity on its own; and</li> <li>3. The community has exhausted all other options/sources for funding the activity.</li> </ol> <p><b><u>DOCUMENTATION REQUIREMENTS</u></b></p> <ol style="list-style-type: none"> <li>1. Each application <u>must</u> include the UGLG’s most recent audit. If unavailable, please contact the Department to determine potential alternative documentation.</li> <li>2. All required application forms must be completed with appropriate backup documentation.</li> <li>3. The Department reserves the right to designate an application “DO NOT FUND”, and not complete the rest of its’ review for the following reasons: Using self-created forms. Forged, copied, taped, pasted or any alterations to original signatures or dates.</li> <li>4. The project must qualify for the National Objective of Urgent Need, however, the percentage of Low-to-Moderate income persons in the area must be provided. If the area meets or exceeds 51% LMI, the National Objective of LMI will be utilized in the grant award.</li> </ol> |
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| <p><b>If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)</b></p>  | <p>Application Guidelines and forms can be found at: <a href="http://www.illinois.gov/dceo">http://www.illinois.gov/dceo</a></p> |
| <p><b>Describe the process for awarding funds to state recipients and how the state will make its allocation available to units of general local government, and non-profit organizations, including community and faith-based organizations. (ESG only)</b></p> | <p>N/A</p>   |

|   |   |               |                |                 |
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| Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only) | N/A                                       |               |                |                 |
| Describe how resources will be allocated among funding categories.  | <u>Program Category</u>                   | <u>Budget</u> | <u>Ceiling</u> | <u>Deadline</u> |
|   | <u>Ongoing (non-competitive Programs)</u> |               |                |                 |
|   | Economic Development (ED)                 | \$ 4,000,000  | \$1,000,000    | NA              |
|   | Disaster Response (DR)                    | \$ 2,000,000  | \$ 500,000     | NA              |
|   | <u>Competitive Programs</u>               |               |                |                 |
|   | Public Infrastructure (PI)                | \$15,000,000  | \$ 500,000     | 8/29/2019       |
|   | Housing Rehabilitation (HR)               | \$ 6,500,000  | \$ 500,000     | 8/29/2019       |
|   | <u>Pilot Project</u>                      |               |                |                 |
|   | —   |               |                |                 |
| Help Eliminate Lead Program (HELP)  | \$ Ongoing; no new funding                |               | NA             |                 |

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|          | <b>Describe threshold factors and grant size limits.</b>                                 | Application must come after a State Disaster Declaration by the Governor for the area. Grant limit is \$500,000 unless the limit is waived by DCEO's Director. |
|          | <b>What are the outcome measures expected as a result of the method of distribution?</b> | Unknown at this time.  |
| <b>2</b> | <b>State Program Name:</b>   | CDBG Economic Development Grant Program  |
|          | <b>Funding Sources:</b>  | CDBG   |

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| <p><b>Describe the state program addressed by the Method of Distribution.</b></p>   | <p>Projects which create and/or retain private, permanent jobs in the industrial and commercial sector will be considered under this component. To be competitive, projects should attract sizable private investment, have solid commitments to create or retain permanent jobs, demonstrate financial feasibility, and benefit low- to moderate-income persons. Further, there must be evidence that the project and related investment would not occur without CDBG involvement.</p> |
| <p><b>Describe all of the criteria that will be used to select applications and the relative importance of these criteria.</b></p>  | <p>The criteria noted below will be used to evaluate all applications requesting funding under the CDBG Economic Development component, as well as determine the appropriate level of financial assistance:</p> <ol style="list-style-type: none"> <li>1. Project Benefit</li> <li>2. CDBG National Objectives</li> <li>3. CDBG Dollars</li> <li>4. Resource Funding</li> </ol>   |
| <p><b>If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)</b></p> | <p>Application Guidelines and forms can be found at:<a href="http://www.illinois.gov/dceo">http://www.illinois.gov/dceo</a></p>   |

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| <p><b>Describe the process for awarding funds to state recipients and how the state will make its allocation available to units of general local government, and non-profit organizations, including community and faith-based organizations. (ESG only)</b></p> | <p>N/A</p> |
| <p><b>Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)</b></p>  | <p>N/A</p> |

| Describe how resources will be allocated among funding categories. | <u>Program Category</u>                   | <u>Budget</u>              | <u>Ceiling</u> | <u>Deadline</u> |
|--|---|----------------------------|----------------|-----------------|
|  | <u>Ongoing (non-competitive Programs)</u> |                            |                |                 |
|  | Economic Development (ED)                 | \$ 4,000,000               | \$1,000,000    | NA              |
|  | Disaster Response (DR)                    | \$ 2,000,000               | \$ 500,000     | NA              |
|  | <u>Competitive Programs</u>               |                            |                |                 |
|  | Public Infrastructure (PI)                | \$15,000,000               | \$ 500,000     | 8/29/2019       |
|  | Housing Rehabilitation (HR)               | \$ 6,500,000               | \$ 500,000     | 8/29/2019       |
|  | <u>Pilot Project</u>                      |                            |                |                 |
|  | Help Eliminate Lead Program (HELP)        | \$ Ongoing; no new funding |                | NA              |



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|  | <p><b>Describe threshold factors and grant size limits.</b></p> | <p>CDBG Economic Development component funds may be used to assist for-profit and not-for-profit firms to carry out economic development projects. Generally, CDBG grant funds will be provided by the unit of local government to the profit or not-for-profit business under a financial assistance agreement at agreed upon terms.</p> <p>1. The business may use funds for:</p> <ul style="list-style-type: none"> <li>• Acquisition of land or building;</li> <li>• Purchase or installation of fixtures;</li> <li>• Construction, reconstruction, installation or rehabilitation of commercial or industrial buildings, structures and other real property);</li> <li>• Leasehold improvements; and</li> <li>• Working capital expenses (inventory, employee salaries, general operating expenses and advertising/marketing expenses.</li> </ul> <p>2. Units of local government may use CDBG funds for public infrastructure improvements in support of economic development.</p> |
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|   | <b>What are the outcome measures expected as a result of the method of distribution?</b> | The number of persons and businesses served for the Economic Development program is calculated by dividing the program budget of \$4,000,000 by the grant ceiling of \$1,000,000; equating to 4 businesses; and then multiplying by the maximum federal jobs to dollars ration of \$1 to \$35,000; equaling 114. |
| 3 | <b>State Program Name:</b>   | CDBG Housing Rehabilitation Grant Program  |
|   | <b>Funding Sources:</b>  | CDBG   |
|   | <b>Describe the state program addressed by the Method of Distribution.</b>               | The program targets housing projects which preserve single-family, owner-occupied housing and encourage neighborhood revitalization. The funds are available to address housing needs of eligible low-to-moderate income households  |

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| <p><b>Describe all of the criteria that will be used to select applications and the relative importance of these criteria.</b></p>  | <p>The maximum available points per application are 100 points. The maximum scores available for each of the four scoring criteria are:</p> <ol style="list-style-type: none"> <li>1. <b><u>Project Need – Maximum Score 20 Points</u></b><br/>Project Need may be established based on the low-to-moderate income of an entire community, an individual census block, combined census blocks, or a target area. The score will be based on total percentage of LMI households in the project area.</li> <li>2. <b><u>Project Impact – Maximum Score 20 Points</u></b><br/>In order to document an achievable impact in the project area, a minimum number of completed Housing Needs Surveys must be submitted with the application; the equivalent of two times the projects proposed scope of work.</li> <li>3. <b><u>Coordination of Resources – Maximum Score 30 Points</u></b><br/>Scores will be provided based upon the applicant’s submission of documentation of additional resources which will provide assistance to LMI households in coordination with the CDBG housing programs.</li> <li>4. <b><u>Project Readiness – Maximum Score 30 Points</u></b><br/>Scores will be provided based upon the applicant’s submission of documentation that all administrative and technical issues involved in assuring a successful housing project have been addressed</li> </ol> |
| <p><b>If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)</b></p> | <p>Application Guidelines and forms can be found at:<a href="http://www.illinois.gov/dceo">http://www.illinois.gov/dceo</a></p>  |

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| <p><b>Describe the process for awarding funds to state recipients and how the state will make its allocation available to units of general local government, and non-profit organizations, including community and faith-based organizations. (ESG only)</b></p> | <p>N/A</p> |
| <p><b>Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)</b></p>  | <p>N/A</p> |

|  | Describe how resources will be allocated among funding categories. | <u>Program Category</u>   | <u>Budget</u>              | <u>Ceiling</u> | <u>Deadline</u> |
|--|--|---|----------------------------|----------------|-----------------|
|  |  | <u>Ongoing (non-competitive Programs)</u>   |                            |                |                 |
|  |  | Economic Development (ED)   | \$ 4,000,000               | \$1,000,000    | NA              |
|  |  | Disaster Response (DR)  | \$ 2,000,000               | \$ 500,000     | NA              |
|  |  | <u>Competitive Programs</u>   |                            |                |                 |
|  |  | Public Infrastructure (PI)  | \$15,000,000               | \$ 500,000     | 8/29/2019       |
|  |  | Housing Rehabilitation (HR)   | \$ 6,500,000               | \$ 500,000     | 8/29/2019       |
|  |  | <u>Pilot Project</u>  |                            |                |                 |
|  |  | Help Eliminate Lead Program (HELP)  | \$ Ongoing; no new funding |                | NA              |
|  | Describe threshold factors and grant size limits.                  | Benefit to Low-and-Moderate Income Persons: Each application must include documentation that the proposed project will benefit 100% low-to-moderate income persons. Those projects benefiting less than 100% low-to-moderate income persons will not be considered further. |                            |                |                 |

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|   | <b>What are the outcome measures expected as a result of the method of distribution?</b> | CDBG Housing Rehabilitation Program goals are determined by dividing the program budget of \$6,500,000 by the grant ceiling of \$500,000 to equal 13 grants, multiplied by the anticipated number of homes (10) that can be served at the maximum budget amount per home (\$50,000). |
| 4 | <b>State Program Name:</b>   | CDBG Public Infrastructure Grant Program   |
|   | <b>Funding Sources:</b>  | CDBG   |
|   | <b>Describe the state program addressed by the Method of Distribution.</b>               | The objective of this competitive program component is to fund public infrastructure projects, with priority given to projects involving water and sanitary systems, or storm sewer upgrades   |

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| <p><b>Describe all of the criteria that will be used to select applications and the relative importance of these criteria.</b></p>  | <p>Projects will be evaluated according to the criteria noted below.</p> <ol style="list-style-type: none"> <li>1. Low-to-Moderate Income Level (25 percent of overall score)</li> <li>2. Threat to Health &amp; Safety/Urgency (25 percent of overall score): The degree to which present conditions affect public health and safety, and the severity and immediacy of the problem</li> <li>3. Project Readiness (50 percent of overall score): Each application must demonstrate that the proposed project is appropriate and achievable and that all actions required have been completed to ensure timely implementation of the project.</li> </ol> |
| <p><b>If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)</b></p> | <p>Application Guidelines and forms can be found at:<a href="http://www.illinois.gov/dceo">http://www.illinois.gov/dceo</a></p>  |

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| <p><b>Describe the process for awarding funds to state recipients and how the state will make its allocation available to units of general local government, and non-profit organizations, including community and faith-based organizations. (ESG only)</b></p> | <p>N/A</p> |
| <p><b>Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)</b></p>  | <p>N/A</p> |



|  | Describe how resources will be allocated among funding categories. | <u>Program Category</u>  | <u>Budget</u>              | <u>Ceiling</u> | <u>Deadline</u> |
|--|--|--|----------------------------|----------------|-----------------|
|  |  | <u>Ongoing (non-competitive Programs)</u>  |                            |                |                 |
|  |  | Economic Development (ED)  | \$ 4,000,000               | \$1,000,000    | NA              |
|  |  | Disaster Response (DR)   | \$ 2,000,000               | \$ 500,000     | NA              |
|  |  | <u>Competitive Programs</u>  |                            |                |                 |
|  |  | Public Infrastructure (PI)   | \$15,000,000               | \$ 500,000     | 8/29/2019       |
|  |  | Housing Rehabilitation (HR)  | \$ 6,500,000               | \$ 500,000     | 8/29/2019       |
|  |  | <u>Pilot Project</u>   |                            |                |                 |
|  |  | Help Eliminate Lead Program (HELP)   | \$ Ongoing; no new funding |                | NA              |
|  | Describe threshold factors and grant size limits.                  | <u>Eligibility Thresholds:</u> <ol style="list-style-type: none"> <li>1. <b><u>Low to Moderate Income Benefit Requirement:</u></b> Each application must include documentation that the proposed project will benefit at least 51.0 percent LMI persons.</li> <li>2. <b><u>Documentation of Threat to Health and Safety:</u></b> Each application should detail the public infrastructure needs to be addressed by the proposed project.</li> <li>3. <b><u>Water and Sewer Rates:</u></b> A fundamental principle of utility fund financing is that user <i>rates should be sufficient</i> to fund the entire cost of utility system operations</li> </ol> |                            |                |                 |

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|   | <b>What are the outcome measures expected as a result of the method of distribution?</b> | The number of persons served for the Public Infrastructure program is calculated by dividing the program budget of \$15,000,000 by the grant ceiling of \$500,000; equating to 28; and then multiplying by the average number of persons served by each Public Infrastructure grant (500); equaling 14,000.   |
| 5 | <b>State Program Name:</b>   | CDBG Section 8 Loan Guarantee Program   |
|   | <b>Funding Sources:</b>  | CDBG  |
|   | <b>Describe the state program addressed by the Method of Distribution.</b>               | Since authorization for the Section 108, the State of Illinois has not received any fundable applications. Consequently, as of 2018 the State has discontinued the program, and instead focusing its' resources on a broader Economic Development grant program. The State feels the Economic Development grants will be a more useful tool to businesses than Section 108 Loans. |

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| <p><b>Describe all of the criteria that will be used to select applications and the relative importance of these criteria.</b></p>  | <p>N/A</p> |
| <p><b>If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)</b></p> | <p>N/A</p> |

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| <p><b>Describe the process for awarding funds to state recipients and how the state will make its allocation available to units of general local government, and non-profit organizations, including community and faith-based organizations. (ESG only)</b></p> | <p>N/A</p> |
| <p><b>Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)</b></p>  | <p>N/A</p> |

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|  | <b>Describe how resources will be allocated among funding categories.</b> | N/A |
|  | <b>Describe threshold factors and grant size limits.</b>                  | N/A |

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|   | <b>What are the outcome measures expected as a result of the method of distribution?</b> | N/A  |
| 6 | <b>State Program Name:</b>   | CDBG-DR Sandy Public Infrastructure Grants |
|   | <b>Funding Sources:</b>  | CDBG                                       |

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| <p><b>Describe the state program addressed by the Method of Distribution.</b></p> | <p>The Disaster Relief Appropriations Act, 2013 (Pub. L. 113-2, approved January 29, 2013) (Appropriations Act) made available \$16 billion in Community Development Block Grant (CDBG) funds for necessary expenses related to disaster relief, long-term recovery, restoration of infrastructure, housing, and economic revitalization in the most impacted and distressed areas resulting from a major disaster declared pursuant to the Robert T. Stafford Disaster Relief and Emergency Act of 1974 (42 U.S.C. 5121 et seq.) (Stafford Act), due to Hurricane Sandy and other eligible events in calendar years 2011, 2012, 2013.</p> <p>Subsequent to the Act, on December 16, 2013 a Federal Notice was published (Federal Register Volume 78, No. 241) that built upon the requirements of the aforementioned Act and advised the public of a \$128,500,000 allocation for the purpose of assisting recovery in the most impacted and distressed areas in Colorado, Illinois and Oklahoma declared a major disaster in 2013. As the Appropriations Act requires funds to be awarded directly to a State, or unit of general local government. In addition, The Appropriations Act requires funds to be used only for specific disaster recovery-related purposes. The law also requires that prior to the obligation of funds, a the State must submit a plan detailing the proposed use of funds, including criteria for eligibility and how the use of these funds will address disaster relief, long-term recovery, restoration of infrastructure and housing and economic revitalization in the most impacted and distressed areas. Detailed information on the use of the \$10,400,000 awarded the State to meet those needs are included as part of the 2013 Disaster Recovery Action Plan. All Sandy Disaster funding has been allocated and spent as of April, 2018.</p> |
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| <p><b>Describe all of the criteria that will be used to select applications and the relative importance of these criteria.</b></p>  | <p>N/A</p> |
| <p><b>If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)</b></p> | <p>N/A</p> |



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| <p><b>Describe the process for awarding funds to state recipients and how the state will make its allocation available to units of general local government, and non-profit organizations, including community and faith-based organizations. (ESG only)</b></p> | <p>N/A</p> |
| <p><b>Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)</b></p>  | <p>N/A</p> |

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|  | <b>Describe how resources will be allocated among funding categories.</b> | N/A |
|  | <b>Describe threshold factors and grant size limits.</b>                  | N/A |

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|          | <b>What are the outcome measures expected as a result of the method of distribution?</b> | N/A   |
| <b>7</b> | <b>State Program Name:</b>   | Emergency Solutions Grants Program  |
|          | <b>Funding Sources:</b>  | ESG   |
|          | <b>Describe the state program addressed by the Method of Distribution.</b>               | The Emergency Solutions Grants provides funding to engage homeless individuals and families living on the street; improve the number and quality of emergency shelters for homeless individuals and families; help operate these shelters; provide essential services to shelter residents; rapidly re-house homeless individuals and families, and prevent families/individuals from becoming homeless |

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| <p><b>Describe all of the criteria that will be used to select applications and the relative importance of these criteria.</b></p>  | <p>Recommendations for funding are based on: the needs assessment conducted by the regional Homeless Continuums of Care, housing analysis, and performance of the provider agency (based on HMIS (Homeless Management Information System) and other factors).</p> |
| <p><b>If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)</b></p> |   |

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| <p><b>Describe the process for awarding funds to state recipients and how the state will make its allocation available to units of general local government, and non-profit organizations, including community and faith-based organizations. (ESG only)</b></p> | <p>Deliberate steps are taken to identify the providers, either units of local government or not-for-profit organizations, based on regional need and the ability to administer and expend the funds. The Department uses a formula based spreadsheet in order to determine the amount of ESG funding for each Continuum of Care (CoC). The spreadsheet includes statistical data for poverty, housing, population, etc.. These amounts are then provided to each CoC with a request for funding recommendations. They are asked to provide the organization name, amount of funding recommended and the activities recommended for funding. The recommended organizations are required to submit a completed application including a budget. The applications are reviewed for completeness by at least 2 staff persons. If necessary, a list of "Outstanding Application Requirements" is sent to the provider detailing documentation that is still needed.</p> |
| <p><b>Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)</b></p>  |  |

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|  | <b>Describe how resources will be allocated among funding categories.</b> | Resources are allocated to eligible ESG activities based on Continuum of Care recommendations, as needs vary across the communities |
|  | <b>Describe threshold factors and grant size limits.</b>                  | ESG minimum grant award is \$25,000. Recipients must be a participating member of a Homeless Continuum of Care                      |

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|   | <b>What are the outcome measures expected as a result of the method of distribution?</b> | ESG funds will be used to provide affordability of decent housing through homeless prevention and rapid re-housing activities; and will provide availability/accessibility of a suitable living environment to homeless individuals and families who need emergency shelter  |
| 8 | <b>State Program Name:</b>   | Help Eliminate Lead Program (HELP) Pilot Program   |
|   | <b>Funding Sources:</b>  | CDBG   |
|   | <b>Describe the state program addressed by the Method of Distribution.</b>               | The Help Eliminate Lead Program (HELP) Pilot Project is being conducted in the targeted community of Galesburg, IL. EPA data indicates the city has one of the nation's most persistent lead problems, exceeding the federal lead-action level for lead in their potable water system in 22 out of 30 sampling periods since 1992. In addition, one in 20 children under the age of six in the County have elevated blood lead levels. DCEO is addressing this issue through the implementation of the Help Eliminate Lead Program (HELP) Pilot Project. HELP is a cross-agency initiative to reduce children's exposure to lead and lessen the number of children in Illinois who suffer from its detrimental health effects. This program will be done in cooperation with an IEPA project to assist the community in replacing water lead-service lines. The results of this pilot project will help Illinois provide a comprehensive lead hazard control program to low-income families who occupy substandard pre-1978 privately-owned housing throughout Illinois. DCEO Community Development Block Grant (CDBG) funds provided \$500,000 from 2016 funds for the program. |

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| <p><b>Describe all of the criteria that will be used to select applications and the relative importance of these criteria.</b></p>  | <p>Pilot Project</p>   |
| <p><b>If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)</b></p> | <p>The Department will develop processes as identified in our application to the Lead-Based Paint Hazard Control (LBPHC) Grant Program FR-6100-N-12 and subsequent 2019 grant award.</p> |



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| <p><b>Describe the process for awarding funds to state recipients and how the state will make its allocation available to units of general local government, and non-profit organizations, including community and faith-based organizations. (ESG only)</b></p> | <p>N/A</p> |
| <p><b>Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)</b></p>  | <p>N/A</p> |

|  |   |     |
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|  | <b>Describe how resources will be allocated among funding categories.</b> | N/A |
|  | <b>Describe threshold factors and grant size limits.</b>                  | N/A |

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|   | <b>What are the outcome measures expected as a result of the method of distribution?</b> | The mission of the HELP program is to improve the health and well-being of Illinois residents, especially vulnerable populations such as children under the age of six, by promoting safe and healthy home environments through comprehensive home-based intervention programs, lead certification and regulations, public education, outreach, and statewide partnerships. |
| 9 | <b>State Program Name:</b>   | HOME Multifamily (including CHDO)   |
|   | <b>Funding Sources:</b>  | HOME  |
|   | <b>Describe the state program addressed by the Method of Distribution.</b>               | Multi-family new construction and rehabilitation (including Community Housing Development Organizations - CHDOs)  |

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| <p><b>Describe all of the criteria that will be used to select applications and the relative importance of these criteria.</b></p>  | <p>Review and selection criteria include but are not limited to financial feasibility (using IHDA-published underwriting criteria), site and market feasibility, development/management team capacity and experience, site control, commitment of leveraged resources, and other factors. These increase if the Low Income Housing Tax Credit is involved, as it has its own separate application scoring system</p> |
| <p><b>If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)</b></p> | <p>IHDA's Multi-Family common application system, forms, and instructions are posted on IHDA's website at <a href="http://www.ihda.org/developer/forms.htm#referenceDocuments">www.ihda.org/developer/forms.htm#referenceDocuments</a></p>   |

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| <p><b>Describe the process for awarding funds to state recipients and how the state will make its allocation available to units of general local government, and non-profit organizations, including community and faith-based organizations. (ESG only)</b></p> | <p>IHDA's Common Application process/format is utilized for all HOME multifamily projects, including CHDO-owned properties. After staff review (completeness, eligibility, site and market feasibility, underwriting), projects then go through a staff peer review, by internal IHDA Loan Committee, and to the IHDA Board for final consideration and approval</p> |
| <p><b>Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)</b></p>  |  |

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| <p><b>Describe how resources will be allocated among funding categories.</b></p> | <p>Under the 2015-2019 Consolidated Plan, IHDA is only utilizing HOME funding for rental housing development/rehabilitation. The program uses IHDA's "Common" application and funding process. Funding allocation is based on a number of factors including available resources, anticipated program income, anticipated completion timeframe for existing programs, pipeline of approved projects requesting HOME funding, and alternative funding sources available, among other factors</p>  |
| <p><b>Describe threshold factors and grant size limits.</b></p>                  | <p>Threshold factors are described in detail in the Multifamily common application referenced above. Grant (loan) size limits have been imposed recently for IHDA's subordinate debt sources (i.e., primarily HOME and (State) Affordable Housing Trust Fund) due to relative lack of availability to meet demand. It is primarily involving projects also seeking Low Income Housing Tax Credit assistance. For non-metro and AHPAA areas, it is set at 20% of total development costs, capped at a maximum request of \$2 million. For Chicago, Chicago metro, and other metro areas, it is set at 10% of total development costs, capped at a maximum request of \$1 million</p> |

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|    | <b>What are the outcome measures expected as a result of the method of distribution?</b> | <p>The State of Illinois will use the following HUD-determined Objective and Outcome statements for its CPD-HOME formula activities, expressed via the number of affordable housing units provided/preserved:</p> <ul style="list-style-type: none"> <li>• Accessibility for the purpose of creating suitable living environments</li> <li>• Accessibility for the purpose of creating economic opportunities</li> <li>• Affordability for the purpose of providing decent affordable housing</li> <li>• Affordability for the purpose of creating economic opportunities</li> <li>• Sustainability for the purpose of creating suitable living environments</li> <li>• Sustainability for the purpose of providing decent affordable housing</li> </ul> |
| 10 | <b>State Program Name:</b>   | HOPWA Facility Based Rental Assistance   |
|    | <b>Funding Sources:</b>  | HOPWA  |
|    | <b>Describe the state program addressed by the Method of Distribution.</b>               | The HOPWA facility-based program will provide rent and supportive services to persons living with HIV/AIDS. The Illinois HOPWA program eligibility is based on the 80% area median income. The individual requesting housing assistance must demonstrate a need for housing assistance. Funding will expand to outside the Illinois HOPWA jurisdictional area.   |

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| <b>Describe all of the criteria that will be used to select applications and the relative importance of these criteria.</b>  | The Illinois Department of Public Health's application for HOPWA funding requires all applicants, including HIV Care Connect Regions, to describe the regional area to be served by the applicant, the population of persons with HIV/AIDS in the proposed regional area to be served, and the housing service needs not currently being addressed by available public and/or private resources within the proposed service area. IDPH requires a project plan and budget as part of the application process, including measurable goals, objectives, project coordination, and information on how the project would be continued if HOPWA funds were reduced or not available in future years. The application process is expected to fund Project sponsors located around the State. Facility based rental assistance will allow the State to ensure that housing is available to the most at-risk individuals living with HIV/AIDS that require the more intensive supportive living environment to deal with other issues. |
| <b>If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)</b> |  |



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| <p><b>Describe the process for awarding funds to state recipients and how the state will make its allocation available to units of general local government, and non-profit organizations, including community and faith-based organizations. (ESG only)</b></p> |  |
| <p><b>Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)</b></p>  | <p>Application process will be extended to the entire State with the intent to provide emergency and stable housing to individuals living with HIV/AIDS who are at-risk of homelessness Stable housing provides a foundation for individuals with chronic illness such as HIV/AIDS, to improve their health outcomes</p> |

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| <p><b>Describe how resources will be allocated among funding categories.</b></p> | <p>Resources that are allocated through the State of Illinois HIV Care Region and will be based on the guidelines established for the facility based rental assistance.</p>  |
| <p><b>Describe threshold factors and grant size limits.</b></p>                  | <p>The HIV Care Connect Region funding formula is based on an annual award amount that is based on the morbidity data. All HIV Care Connect are increased based on the increase in housing costs and the number of persons served. Funding is also based on local availability of resources as well as other community resources. The Department developed an application for use by all HIV Care Connect to prepare their initial HOPWA funding plans. The application required all project sponsors to describe the intended service area, the population of persons with HIV/AIDS, and the housing service needs not currently being addressed by available public and/or private resources within the service area. Additionally, the Department required a project plan and budget, including measurable goals and objectives, project coordination and how the project would be continued if HOPWA funds were reduced or not available in future years. The application will be based on funding availability.</p> |

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|           | <b>What are the outcome measures expected as a result of the method of distribution?</b> | Safe and affordable housing is the expected outcome of the method of distribution. Housing for persons with HIV/AIDS is an important component of the national response to AIDS. The National AIDS Strategy recognizes that housing is essential in providing health care and other support and sets a goal for ensuring that all persons with HIV have access to services and housing that is affordable, of high quality and responsive to their needs. |
| <b>11</b> | <b>State Program Name:</b>   | HOPWA Facility-Based Housing Operations Assistance Program  |
|           | <b>Funding Sources:</b>  | HOPWA   |

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| <p><b>Describe the state program addressed by the Method of Distribution.</b></p>  | <p>This program provides eligible AIDS designated-housing facilities with funds for the provision of meals and lodging to residents; rehabilitation and repair of facilities; operating costs which may include maintenance, security, insurance, utilities, furnishings, equipment, supplies and other incidental costs of the facility; and supportive services such as case management, mental health counseling, and substance abuse treatment provided to facility residents. Several housing facilities have requested funding for housing. Kane County was recently added to the State of Illinois service area. Kane County was located in the Chicago EMA.</p> <p>The Department developed an application for use by all HIV Care Connect to prepare their initial HOPWA funding plans. The application required all project sponsors to describe the intended service area, the population of persons with HIV/AIDS, and the housing service needs not currently being addressed by available public and/or private resources within the service area. Additionally, the Department required a project plan and budget, including measurable goals and objectives, project coordination and how the project would be continued if HOPWA funds were reduced or not available in future years. The application process incorporated a deadline for submission of applications. Funding will be extended to the State of Illinois to ensure that needed services are provided to persons living with HIV/AIDS.</p> |
| <p><b>Describe all of the criteria that will be used to select applications and the relative importance of these criteria.</b></p> | <p>The Illinois Department of Public Health's application for HOPWA funding requires all applicants, including HIV Care Connect Regions, to describe the regional area to be served by the applicant, the population of persons with HIV/AIDS in the proposed regional area to be served, and the housing service needs not currently being addressed by available public and/or private resources within the proposed service area. IDPH requires a project plan and budget as part of the application process, including measurable goals, objectives, project coordination, and information on how the project would be continued if HOPWA funds were reduced or not available in future years. The application process incorporates a deadline for submission of applications</p>   |

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| <p><b>If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)</b></p>  |  |
| <p><b>Describe the process for awarding funds to state recipients and how the state will make its allocation available to units of general local government, and non-profit organizations, including community and faith-based organizations. (ESG only)</b></p> |  |

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| <b>Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)</b> | <p>The sponsor selection process is based on the Lead Agencies that receive funding for Ryan White Title II funds. Each Regional Care Connect office has a local advisory board to assist the lead agency with determining priority services. The Department allows the HIV Care Connect Lead Agents to subcontract with local service providers for housing services. The Department holds meetings with lead agencies, giving instruction on how to include faith-based organizations as entities eligible to apply for funding. This type of collaboration brings a wide variety of people together to address a very complex disease. The HIV Care regions have experience in identifying needs, planning, contracting for services, developing formal linkages with service providers and providing a continuum of care to persons with HIV/AIDS. The work plan will include descriptions of populations to be served, the care and service needs of the populations and ways in which the HIV Care Connect Regions will insure that the most in need will receive housing assistance. The application required all HIV Care Connect Regions to describe the intended regional area to be served, the population of persons with HIV/AIDS, and the housing service needs not currently being addressed by public and private resources within the service area.</p> |
| <b>Describe how resources will be allocated among funding categories.</b>  | <p>The application required a description of all housing categories to be provided. The application required all project sponsors to describe the intended service area, the population of persons with HIV/AIDS, and the housing service needs not currently being addressed by available public and/or private resources within the service area. Additionally, the Department required a project plan and budget, including measurable goals and objectives, project coordination and how the project would be continued if HOPWA funds were reduced or not available in future years.</p>  |

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|    | <b>Describe threshold factors and grant size limits.</b>                                 | AIDS designated housing facilities which are located in the HIV Care Connect Region received funding to service persons living HIV/AIDS who are in need of housing and supportive services. Maximum grant amounts are dependent on funding availability. |
|    | <b>What are the outcome measures expected as a result of the method of distribution?</b> | Decent safe and affordable housing   |
| 12 | <b>State Program Name:</b>   | HOPWA Facility-Based Housing Rehabilitation and Repair   |
|    | <b>Funding Sources:</b>  | HOPWA  |
|    | <b>Describe the state program addressed by the Method of Distribution.</b>               | This program provides funding for HOPWA Facility-Based Housing Rehabilitation and Repair activities to ensure the preservation of decent, safe housing for clients of the HOPWA program  |

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| <p><b>Describe all of the criteria that will be used to select applications and the relative importance of these criteria.</b></p>  | <p>The Illinois Department of Public Health's application for HOPWA funding requires all applicants, including HIV Care Connect Regions, to describe the regional area to be served by the applicant, the population of persons with HIV/AIDS in the proposed regional area to be served, and the housing service needs not currently being addressed by available public and/or private resources within the proposed service area. IDPH requires a project plan budget as part of the application process, including measurable goals, objectives, project coordination, and information on how the project would be continued if HOPWA funds were reduced or not available in future years. The application process incorporates a deadline for submission of applications</p> |
| <p><b>If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)</b></p> |   |



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| <p><b>Describe the process for awarding funds to state recipients and how the state will make its allocation available to units of general local government, and non-profit organizations, including community and faith-based organizations. (ESG only)</b></p> |  |
| <p><b>Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)</b></p>  | <p>The sponsor selection process is based on the Lead Agencies that receive funding for Ryan White Title II funds. Each Regional Care Connect office has a local advisory board to assist the lead agency with determining priority services. The Department allows the HIV Care Connect Lead Agents to subcontract with local service providers for housing services. The Department holds meetings with lead agencies, giving instruction on how to include faith-based organizations as entities eligible to apply for funding. The type of collaboration brings a wide variety of people together to address a very complex disease. The HIV Care regions have experience in identifying needs, planning, contracting for services, developing formal linkages with service providers and providing a continuum of care to persons with HIV/AIDS. The work plan will include descriptions of populations to be served, the care and service needs of the populations and ways in which the HIV Care Connect Regions will insure that the most in need will receive housing assistance. The application required all HIV Care Connect Regions to describe the intended regional area to be served, the population of persons with HIV/AIDS, and the housing service needs not currently being addressed by public and private resources within the service area</p> |

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| <p><b>Describe how resources will be allocated among funding categories.</b></p> | <p>The application requires a description of all housing categories to be provided. The application requires all project sponsors to describe the intended service area, the population of persons with HIV/AIDS, and the housing service needs not currently being addressed by available public and/or private resources within the service area. Additionally, the Department requires a project plan and budget, and an environmental review, including measurable goals and objectives, project coordination and how the project would be continued if HOPWA funds were reduced or not available in future years</p> |
| <p><b>Describe threshold factors and grant size limits.</b></p>                  | <p>AIDS designed housing facilities which are located in the HIV Care Connect Region receive funding for necessary rehabilitation and repair to preserved safe, decent housing for persons living HIV/AIDS who are in need of housing and supportive services. Maximum grant amounts are \$168,848 for Rehabilitation/Repairs and Housings Supports</p>   |

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|    | <b>What are the outcome measures expected as a result of the method of distribution?</b> | Decent safe and affordable housing.  |
| 13 | <b>State Program Name:</b>   | HOPWA Short-term Rent, Utility, Mortgage Program   |
|    | <b>Funding Sources:</b>  | HOPWA  |
|    | <b>Describe the state program addressed by the Method of Distribution.</b>               | The HOPWA Short-term Rent, Utility and Mortgage Program (STRUM) provides rent, mortgage and utility assistance to persons living with HIV/AIDS. The Illinois HOPWA program eligibility is based on the 80% area median income. The individual requesting housing assistance must demonstrate a need for housing assistance. In addition, the Department of Public Health had allocated funding to Winnebago County Health Department to provide Tenant based rental assistance. Currently, ten remain stably housed. Housing service caps are instituted under the HOPWA program to include uniformity and non-discrimination to households requesting rent, mortgage or utility assistance. Caps are determined by fair market rents/rent reasonableness. |

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| <b>Describe all of the criteria that will be used to select applications and the relative importance of these criteria.</b>  | The Illinois Department of Public Health's application for HOPWA funding requires all applicants, including HIV Care Connect Regions, to describe the regional area to be served by the applicant, the population of persons with HIV/AIDS in the proposed regional area to be served, and the housing service needs not currently being addressed by available public and/or private resources within the proposed service area. IDPH requires a project plan and budget as part of the application process, including measurable goals, objectives, project coordination, and information on how the project would be continued if HOPWA funds were reduced or not available in future years. The application process incorporates a deadline for submission of applications. |
| <b>If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)</b> |   |

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| <p><b>Describe the process for awarding funds to state recipients and how the state will make its allocation available to units of general local government, and non-profit organizations, including community and faith-based organizations. (ESG only)</b></p> |   |
| <p><b>Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)</b></p>  | <p>Each Regional office has a local advisory board to assist the lead agency with determining priority services. The type of collaboration brings a wide variety of people together to address a very complex disease. The HIV Care regions have experience in identifying needs, planning, contracting for services, developing formal linkages with service providers and providing a continuum of care to persons with HIV/AIDS. The work plan will include descriptions of populations to be served, the care and service needs of the populations and ways in which the HIV Care Connect Regions will insure that the most in need will receive housing assistance. The application required all HIV Care Connect Regions to describe the intended regional area to be served, the population of persons with HIV/AIDS, and the housing service needs not currently being addressed by public and private resources within the service area.</p> |

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| <p><b>Describe how resources will be allocated among funding categories.</b></p> | <p>The application required all housing The application required all project sponsors to describe the intended service area, the population of persons with HIV/AIDS, and the housing service needs not currently being addressed by available public and/or private resources within the service area. Additionally, the Department required a project plan and budget, including measurable goals and objectives, project coordination and how the project would be continued if HOPWA funds were reduced or not available in future years. Facilities to describe the intended service area, the population of persons with HIV/AIDS, and the housing service needs not currently being addressed by available public and/or private resources within the service area. Additionally, the Department required a project plan and budget, including measurable goals and objectives, project coordination and how the project would be continued if HOPWA funds were reduced or not available in future years.</p>                          |
| <p><b>Describe threshold factors and grant size limits.</b></p>                  | <p>HIV Care Connect Region funding formula is based on an annual award amount that is based on the morbidity data. All HIV Care Connect are increased based on the increase in housing costs and the number of persons served. Funding is also based on local availability of resources as well as other community resources. The Department developed an application for use by all HIV Care Connect to prepare their initial HOPWA funding plans. The application required all project sponsors to describe the intended service area, the population of persons with HIV/AIDS, and the housing service needs not currently being addressed by available public and/or private resources within the service area. Additionally, the Department required a project plan and budget, including measurable goals and objectives, project coordination and how the project would be continued if HOPWA funds were reduced or not available in future years. The application process incorporated a deadline for submission of applications.</p> |

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|    | <b>What are the outcome measures expected as a result of the method of distribution?</b> | The prevention of homelessness is the most important element of administering the HOPWA program. Persons living with HIV/AIDS require stable housing in order to receive effective treatment. All program activities must be administered in accordance with the Department of Housing and Urban Development HOPWA Rules and Regulations. HOPWA grantees are encouraged to develop community-wide strategies through forming partnerships with area non-profits to provide housing assistance and supportive services for eligible persons. HOPWA grantees are urged to require eligible clients to access mainstream entitlement housing and utility assistance programs before accessing HOPWA funds. |
| 14 | <b>State Program Name:</b>   | HOPWA Tenant Based Rental Assistance  |
|    | <b>Funding Sources:</b>  | HOPWA   |
|    | <b>Describe the state program addressed by the Method of Distribution.</b>               | In 2015, Winnebago County Health Department application described the intent to provide tenant based rental assistance due to the number of persons living with HIV/AIDS that do not have an emergency need for receiving Short Term Rent Mortgage and Utility assistance. As a result at total of 10 persons living with HIV/AIDS are provided with affordable housing. Stable housing provides a foundation for individuals with chronic illness such as HIV/AIDS, to improve their health outcomes. The Department plans to expand the use of tenant based rental assistance to other Project sponsors and entities around the State.  |

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| <p><b>Describe all of the criteria that will be used to select applications and the relative importance of these criteria.</b></p>  | <p>Winnebago County Health Department is the only project sponsor that has expressed interest in providing TBRA to persons residing in northwestern Illinois. Winnebago County Health department HIV Care Connect region will be providing tenant based housing assistance in the next current year. Winnebago County Health Department submitted an application of their intent to explore the option of providing TBRA to persons residing in northwestern Illinois. Changes in the use of STRMU pose unique challenges in different areas of Illinois. There continues to be a challenge for case managers to demonstrate that an individual who is already living in poverty has an emergency need to qualify for the STRMU program. The Department wish to extend the tenant based housing assistance program to other areas of the State in 2017. The Illinois Department of Public Health's application for HOPWA funding requires all applicants, including HIV Care Connect Regions, to describe the regional area to be served by the applicant, the population of persons with HIV/AIDS in the proposed regional area to be served, and the housing service needs not currently being addressed by available public and/or private resources within the proposed service area. IDPH requires a project plan and budget as part of the application process, including measurable goals, objectives, project coordination, and information on how the project would be continued if HOPWA funds were reduced or not available in future years. The application process incorporates a deadline for submission of applications.</p> |
| <p><b>If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)</b></p> |   |



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| <p><b>Describe the process for awarding funds to state recipients and how the state will make its allocation available to units of general local government, and non-profit organizations, including community and faith-based organizations. (ESG only)</b></p> |   |
| <p><b>Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)</b></p>  | <p>The selection process will be opened to the entire State. The Department allows the HIV Care Connect Lead Agents to subcontract with local service providers for housing services. The Department recently will holding meeting with lead agents, giving instructions on how to include faith-based organizations as entities eligible to apply for funding.</p> |

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| <p><b>Describe how resources will be allocated among funding categories.</b></p> | <p>Each Regional office has a local advisory board to assist the lead agency with determining priority services. The type of collaboration brings a wide variety of people together to address a very complex disease. The HIV Care regions have experience in identifying needs, planning, contracting for services, developing formal linkages with service providers and providing a continuum of care to persons with HIV/AIDS. The work plan will include descriptions of populations to be served, the care and service needs of the populations and ways in which the HIV Care Connect Regions will insure that the most in need will receive housing assistance. The application required all HIV Care Connect Regions to describe the intended regional area to be served, the population of persons with HIV/AIDS, and the housing service needs not currently being addressed by public and private resources within the service area.</p> |
| <p><b>Describe threshold factors and grant size limits.</b></p>                  | <p>Project Sponsors that are located in the State of Illinois can submit a request for providing Tenant based housing assistance. Project Sponsors will receive funding to service persons living HIV/AIDS who are in need of housing and supportive services.</p>  |

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|    | <b>What are the outcome measures expected as a result of the method of distribution?</b> | Decent safe and affordable housing. |
| 15 | <b>State Program Name:</b>   | National Housing Trust Fund (nHTF)  |
|    | <b>Funding Sources:</b>  | HTF                                 |

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| <p><b>Describe the state program addressed by the Method of Distribution.</b></p> | <p>Multi-family rental housing development (new construction or acquisition/rehabilitation. IHDA will not allow refinancing of existing debt as an eligible activity in the 2019 NHTF Allocation Plan.</p> <p>The Illinois Housing Development Authority (IHDA) has been designated by the Governor as the administering State agency for the NHTF. Authorizing statute and HUD's interim rule place specific parameters on the eligible uses of these funds. State NHTF grantees are allowed to provide direct funding to subgrantee local governments to operate their own local programs/projects, but not required to do so. The State does not intend to use subgrantees in the 2019 funding cycle.</p> <p>If the national funding level falls below \$1 Billion, 100% of program funds must be used to benefit Extremely Low-Income (ELI) households, defined as 30% of area median income or less.</p> <p>States must use at least 80% of all funds (or 90% of program funds) for rental housing/renters. IHDA is allowed to use up to 10% of remaining program funds for homeownership assistance. IHDA will use 90% of all funds (100% of all program funds) for rental housing.</p> <p>There is also an allowance to use up to 10% of all funds for general administration and planning costs. IHDA will use said funds for this purpose, which also include affirmatively furthering fair housing activities.</p> |
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| <p><b>Describe all of the criteria that will be used to select applications and the relative importance of these criteria.</b></p> | <p>IHDA will use its Multi-Family “Common Application” as the major application format for NHTF rental housing projects, the same one used for the LIHTC and HOME programs, along with supplemental information required by program rules (see below). IHDA’s process will include an initial completeness/eligibility scoring, review of mandatory requirements, underwriting, site and market review, peer review, internal Loan Committee and IHDA Board approval. A separate Request for Proposals (RFP) process will be used if needed to expedite obligation of program funds. IHDA will not allow refinancing of existing debt as an eligible activity in the 2019 Allocation Plan of NHTF, and reserves said right in following years.</p> <p><u>Geographic Diversity:</u> The State will distribute HTF funds statewide, subject to the Affordable Housing Planning and Appeal Act to the prioritizing applications that are consistent with the 2015-2019 Consolidated Plan, Section AP-50 Geographic Distribution. IHDA will strive to achieve maximum geographic diversity based on statewide applications and where applicable, aligning set-asides associated with other programs providing non-federal, leveraged funding to the NHTF, rather than establish geographic set asides under the NHTF. In an effort to increase geographic diversity, IHDA provides application workshops in different locations throughout the state.</p> <p><u>Applicant Capacity:</u> As part of IHDA’s application process, each proposed project’s development and management team will be reviewed to ensure that if the developer/owner has appropriate experience, capacity, and staffing to own, develop, and manage the project if approved for funding. This will include IHDA’s past experience with team members, and review of HUD previous participation certificates where applicable. IHDA will also strongly encourage first-time developers to partner with an experienced non-profit or for-profit entity.</p> <p><u>Project-Based Rental Assistance:</u> IHDA will prioritize all rental projects which have committed or available federal, State, and local project-based rental assistance so that rents are affordable to ELI families. These may include: Section 8 Project-Based (preservation only); Project-Based Vouchers; Rental Housing Support Program; and Section 811 Project-Based Rental Assistance. It will utilize 30% of household income for rents and utilities as its standard</p> <p><u>Duration of Affordability Period:</u> Applicants must document the extent to which proposed rents are affordable, especially to ELI households. All projects will be required to establish a minimum 30-</p> |
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|  |  | <p>year affordability period. This will work well particularly for LIHTC projects (extended use periods). Applicants are encouraged to establish longer affordability periods but must meet this minimum.</p> <p><u>Priority Housing Needs of the State:</u> These are defined on the State's Comprehensive Planning Act, and include ELI households, low-income seniors, low-income persons with disabilities, and homeless and at-risk homeless persons and families, as well as preservation and live-near-work projects. These are also</p> |
|  | <p><b>If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)</b></p>  | <p>Eligible NHTF recipients include for-profit and non-profit corporations, and governmental entities, including public housing authorities. There will be an open application process until all funds are committed. In addition to the above, please refer the NHTF appendices attached to this document and see IHDA's website (<a href="http://www.ihda.org">www.ihda.org</a>) for additional information.</p>  |
|  | <p><b>Describe the process for awarding funds to state recipients and how the state will make its allocation available to units of general local government, and non-profit organizations, including community and faith-based organizations. (ESG only)</b></p> |   |

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| <b>Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)</b> |  |
| <b>Describe how resources will be allocated among funding categories.</b>  | <p>If the national funding level falls below \$1 Billion, 100% of program funds must be used to benefit Extremely Low-Income (ELI) households, defined as 30% of area median income or less. The 2019 Illinois NHTF allocation is \$8,575,518. There is also allowance to use up to 10% of all funds (\$857,551.80 in 2019) for general administration and planning costs. IHDA will use said funds for this purpose, which also include affirmatively furthering fair housing activities. IHDA will not establish geographic set-asides for Illinois/NHTF program funds but will strive to achieve maximum geographic diversity in its final funding decisions.</p> |

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|    | <b>Describe threshold factors and grant size limits.</b>                                 | <p>Maximum Per Unit Development Subsidy Costs</p> <p>Grand Total Hard Cost Limits: A Project's grand total hard costs, as calculated in the Common Application, are limited to the sum of the products of the hard cost limit by bedroom type and the number of units, by bedroom type, in the Project. See the attached "Grand Total Hard Costs" for a breakdown of cost per bedroom size regarding the City of Chicago, and Chicago Metropolitan Areas; Other Metro; and Non-metro areas. Maximum allowable for 4+bedroom size in City of Chicago and Chicago Metro Area is \$325,000</p> |
|    | <b>What are the outcome measures expected as a result of the method of distribution?</b> | <p>IHDA will utilize the same performance measurements and outcomes criteria that it has used for the HOME Program (Multi-Family). These are included in the State's Five-Year Consolidated Plan – Strategic Plan and Annual Action Plan goals.</p>   |
| 16 | <b>State Program Name:</b>   | Revolving Loan Fund Activities  |
|    | <b>Funding Sources:</b>  | CDBG  |



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|---|--|
| <b>Describe the state program addressed by the Method of Distribution.</b>  | During the State's 2013 Monitoring Review, HUD determined that DCEO failed to demonstrate eligible use of Revolving Loan Funds by Units of Local Governments. Based upon CPD Notice 04-11 and Part 570, HUD advised the State to close inactive Revolving Loan Fund Accounts; and in those that are still revolving verify that the use of such funds is eligible, per the original intent of the RLF that was formed. In order to meet these requirements and remedy HUD's 2013 Monitoring Finding, the State will close locally held Revolving Loan Funds in a manner where funds may be used for other CDBG-eligible activities. HUD has provided technical assistance to the State to navigate this process.   |
| <b>Describe all of the criteria that will be used to select applications and the relative importance of these criteria.</b> | <p>Applications must meet a National Objective and all requirements as outlined in 2CFR 200. Eligible activities include:</p> <ul style="list-style-type: none"> <li>• Economic Development as outlined in the 2017 State of Illinois CDBG Guidebook <i>except that Leverage is not required.</i></li> <li>• Public Infrastructure as outlined in the 2017 State of Illinois CDBG Guidebook <i>and Activity Delivery and Design activities as part of the overall project.</i></li> <li>• Housing Rehabilitation as outlined in the 2017 State of Illinois CDBG Guidebook <i>and activities defined in the following HUD IDIS Matrix Codes:</i></li> <li>• 03K - Street Improvements - including street drains, storm drains, curb and gutter work, installation of street lights or signs.</li> <li>• 03L - Sidewalks - including sidewalk improvements, and installation of trash receptacles, trees, benches or lighting when part of a streetscape project. 14E - Rehabilitation: Publicly or Privately Owned Commercial/Industrial - improvements to the exterior of a commercial building (generally referred to as "facade improvements") or to the correction of code violations.</li> </ul> |

|  |  |
|--|--|
| <p><b>If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)</b></p>  | <p>Application Guidelines and forms can be found at: <a href="http://www.illinois.gov/dceo">http://www.illinois.gov/dceo</a></p> |
| <p><b>Describe the process for awarding funds to state recipients and how the state will make its allocation available to units of general local government, and non-profit organizations, including community and faith-based organizations. (ESG only)</b></p> | <p>N/A</p>   |

|   |   |
|---|---|
| <p><b>Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)</b></p> | <p>N/A</p>  |
| <p><b>Describe how resources will be allocated among funding categories.</b></p>  | <p>Eligible applicants may choose to utilize funds previously held for Revolving Loan Fund activities for an eligible activity as outlined above.</p> |

|  |  |  |
|--|--|--|
|  | <b>Describe threshold factors and grant size limits.</b>                                 | Eligible applicants are limited to utilizing available funds for no more than two eligible activities. |
|  | <b>What are the outcome measures expected as a result of the method of distribution?</b> | Unknown at this time.  |

**Discussion:**

## AP-35 Projects – (Optional)

### Introduction:

| # | Project Name |
|---|--------------|
|   |              |

Table 9 – Project Information

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

To be inputted as projects are approved

## **AP-38 Project Summary**

### **Project Summary Information**

**AP-40 Section 108 Loan Guarantee – 91.320(k)(1)(ii)**

**Will the state help non-entitlement units of general local government to apply for Section 108 loan funds?**

No

**Available Grant Amounts**

Since authorization for the Section 108, the State of Illinois has not received any fundable applications. Consequently, as of 2018 the State is discontinuing the program, and instead focusing its' resources on a broader Economic Development grant program. The State feels the Economic Development grants will be a more useful tool to businesses than Section 108 Loans.

**Acceptance process of applications**

N/A



**AP-45 Community Revitalization Strategies – 91.320(k)(1)(ii)**

**Will the state allow units of general local government to carry out community revitalization strategies?**

No, the State is not including a Community Revitalization program in the Annual or Consolidated Plan.

**State's Process and Criteria for approving local government revitalization strategies**

**N/A**

## **AP-50 Geographic Distribution – 91.320(f)**

### **Description of the geographic areas of the state (including areas of low-income and minority concentration) where assistance will be directed**

The State has identified very and extremely low-income households as one of the priority populations under the Consolidated Plan. The Authority also puts a high value on quality location of projects and availability of resources and access to amenities. HUD provides CDBG funds to DCEO primarily for rehabilitation in projects in non-entitlement/non-urban areas. Since the CDBG program does limit the ability to utilize CDBG funds for housing beyond housing rehabilitation, the Illinois Department of Commerce and Economic Opportunity as administrator of CDBG targets CDBG funds to owner-occupied households in non-entitlement/non-urban areas. Under the HOME Program, IHDA expends the majority of its HOME Program funding for rental housing through its rental housing development program and through its Single Family Owner Occupied Rehabilitation Program. To some extent, the expenditure of CDBG, HOME Program and other program funds on housing programs is driven by the market. The Authority's impact in opportunity areas within the State is limited by applications for funding in these areas, but is interested in partnering with other community organizations. This is actually done primarily through the Low Income Housing Tax Credit program.

The State is also exploring opportunities to expend significant HOME funds in areas with identified concentrations of low-income and minority populations.

CDBG/Community Development Block Grant Program funding is only available to communities that are not direct Entitlements (receive their own direct CDBG allocation).

Beginning in 2017, the State added the City of Galesburg (zipcode 61401 city limits only) as a Local Target Area for the HELP (Lead) Pilot Project.

ESG is geographically dispersed to the Illinois Continuum of Care agencies.

HOPWA is geographically dispersed to the Illinois HIV Care Consortia regions.

The national HTF will be dispersed statewide. IHDA has not established geographic set-asides, but strives to achieve maximum geographic diversity in its final funding decisions

### **Geographic Distribution**

| <b>Target Area</b>     | <b>Percentage of Funds</b> |
|------------------------|----------------------------|
| Statewide Distribution | 100                        |

**Table 10 - Geographic Distribution**

## **Rationale for the priorities for allocating investments geographically**

The State has not established a policy of targeting its funds within already federally or State-defined eligible areas of the State to more specific jurisdictions or regions. If absolute need numbers were used to determine resource allocations of programs, areas with less densely populated communities (e.g. rural areas, small cities, suburban areas with comparatively lower numbers of low and very low-income households versus total households) would be discriminated against, as most of the assistance would then go to large urban centers exclusively. The State agencies administering Federal and State programs will continue to make concerted efforts to provide more outreach and technical assistance (e.g. workshops) to eligible applicants to ensure that information on affordable housing, economic development and public facilities programs is available on an equitable basis

## **Discussion**

The State of Illinois has established guidelines for all its programs, but has also worked hard to retain the flexibility needed for local governments, non-profits, and developers to apply for projects that meet local market needs. As such, the only major factor governing geographic distribution under each of IHDA's programs is the enabling law or statute for that program. The State does not target its funds by racial or ethnic group. Income is already a major targeting mechanism under almost all of IHDA's as well as HUD's programs. Under its LIHTC Program, however, IHDA does incentivize affordable rental housing applications from local opportunity areas

## Affordable Housing

### AP-55 Affordable Housing – 24 CFR 91.320(g)

#### Introduction:

The tables in this section include combined goals from the different HUD-CPD formula grants. For the purpose of this section, the term "affordable housing" is defined in the HOME regulations at 24 CFR 92.252 for rental housing and 24 CFR 92.254 for homeownership. These estimates do not include the provision of emergency shelter, transitional shelter, or social services

| One Year Goals for the Number of Households to be Supported |       |
|---|-------|
| Homeless  | 2,000 |
| Non-Homeless  | 202   |
| Special-Needs   | 535   |
| Total   | 2,737 |

**Table 11 - One Year Goals for Affordable Housing by Support Requirement**

| One Year Goals for the Number of Households Supported Through |       |
|---|-------|
| Rental Assistance   | 2,535 |
| The Production of New Units                                   | 44    |
| Rehab of Existing Units                                       | 158   |
| Acquisition of Existing Units                                 | 0     |
| Total   | 2,737 |

**Table 12 - One Year Goals for Affordable Housing by Support Type**

#### Discussion:

Production of 28 new units includes anticipated units through HOME Multifamily

Rehab of 18 existing units includes anticipated units through HOME Multifamily

Production of 16 new units includes anticipated units through National Housing Trust Fund

Rehab of 10 existing units includes anticipated units through National Housing Trust Fund

Rehab of 130 existing units includes anticipated units through CDBG single-family Housing Rehabilitation

Rental assistance includes the ESG goal of 2,000 households assisted through rapid rehousing.

Rental assistance included the HOPWA goals of 375 households assisted through short-term rent and mortgage assistance, 87 TBRA, and 73 units provided in transitional short-term housing facilities

developed, leased for operated with HOPWA funds

## **AP-60 Public Housing - 24 CFR 91.320(j)**

### **Introduction:**

With passage of the Quality Housing and Work Responsibility Act, of 1998, States have a more pronounced role in working with local Public Housing Authorities. The State of Illinois does not own or operate any public housing as a public housing authority. Accordingly, the State does not expect to play a management role in encouraging residents of public housing to become more involved in the management of public housing. All public housing authorities are required by HUD to have Resident Councils or Advisory Boards. They are also required to have a resident serving as a member on their Board of Commissioners. The Council/Advisory Board must review and comment on the public housing authority's Annual Agency Plan prior to submittal to HUD

### **Actions planned during the next year to address the needs to public housing**

\* The Consolidated Plan-Action Plan and the Annual Performance Report documents are sent to all public housing authorities (PHAs) in Illinois. PHAs will remain part of the regular notification and distribution process for Consolidated Plan documents.

\* PHAs are also specifically sent an email inviting them to attend the public hearings on the Consolidated Plan.

\*Public housing inventory statistics were included in the Housing Market Analysis Section of the 2015-2019 Consolidated Plan.

\*IHDA took on the additional role of certifying the Consistency of PHA Agency Plans with the State Consolidated Plan (for all PHAs serving non-Entitlement areas which are not covered by a local Consolidated Plan). IHDA also keeps the Illinois Association of Housing Authorities (IAHA) and the Illinois Chapter of the National Association of Housing and Redevelopment Officials (NAHRO) informed of these new procedures by attending targeted meetings of these organizations to make presentations and answer questions about the process to/from PHA officials.

\*IHDA will benefit from reviewing the Agency Plans by obtaining information on PHA waiting lists These assist IHDA in both its future site and market studies and in future program planning. IHDA also works with a number of PHAs on converting Housing Choice Vouchers to Project-Based Assistance, especially under the Low Income Housing Tax Credit Program.

IHDA is also working with a number of PHAs on Rental Assistance Demonstration programs to convert public housing into Section 8 project-based housing units

### **Actions to encourage public housing residents to become more involved in management and**

### **participate in homeownership**

The State of Illinois does not own or operate any public housing as a State public housing authority. As such, it does not anticipate any major State involvement in this area, except to continue to provide related program information to interested parties through the IHDA/OHCS housing information clearinghouse and at related Illinois NAHRO and IAHA conferences, including housing authorities that may be establishing homeownership programs through their Agency Plans

### **If the PHA is designated as troubled, describe the manner in which financial assistance will be provided or other assistance**

As of May 22, 2018, HUD informed IHDA that the PHAs that it had designated as “troubled” under the State of Illinois’ Consolidated Plan were: Alexander County Housing Authority, Danville Housing Authority, Peoria Housing Authority, and Vermillion County Housing Authority. The Danville Housing Authority and Vermillion County Housing Authority are designated as SEMAP “troubled”. The State can, upon local request, provide outreach and technical assistance in an effort to better assess and evaluate options for improving operations, resolving non-compliance problems, and identifying other housing-related needs and issues

### **Discussion:**

Due to increased emphasis on further meeting the housing needs of identified, underserved populations, the State (primarily through IHDA) plans to continue its funding activities with public housing authorities and their non-profit subsidiaries. IHDA will continue to work with PHAs and their non-profit subsidiaries to do both preservation and single-family new construction for rental housing and homeownership, as well as RAD conversion projects referenced earlier

## **AP-65 Homeless and Other Special Needs Activities – 91.320(h)**

### **Introduction**

HUD's Continuum of Care and Rural Housing Stability Assistance Programs provide major federal funding to promote community-wide commitment to the goal of ending homelessness, supporting efforts by nonprofit providers and State and local governments to quickly re-house homeless individuals and families while minimizing the trauma and dislocation caused to individuals, families, and communities by homelessness. The programs promote access to, and effective utilization of mainstream programs to optimize self-sufficiency among individuals and families experiencing homelessness. Coordination with local CoCs is a major strategy under the State's Emergency Solutions Grants (ESG) Program to end homelessness. ESG prioritizes assistance to Very and Extremely Low Income Households, Homeless and At-Risk Homeless Persons and Families, and homeless persons with Disabilities. The State supports applications by eligible CoCs under HUD's Continuum of Care and Rural Housing Stability Assistance Programs, including the review of CoC applications under HUD's programs in order to provide Certifications of Consistency with the State's Consolidated Plan.

HUD's definition of "chronically homeless" assists grantees in focusing their Continuum of Care homeless programs on persons with the longest histories of homelessness, who often also have the highest need.

Under the new final rule, chronically homeless means:

(1) A "homeless individual with a disability," as defined in section 401(9) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11360(9)), who:

(i) Lives in a place not meant for human habitation, a safe haven, or in an emergency shelter; and

(ii) Has been homeless and living as described in paragraph (1) (i) of this definition continuously for at least 12 months or on at least 4 separate occasions in the last 3 years, as long as the combined occasions equal at least 12 months and each break in homelessness separating the occasions included at least 7 consecutive nights of not living as described in paragraph (1)(i). Stays in institutional care facilities for fewer than 90 days will not constitute as a break in homelessness, but rather such stays are included in the 12-month total, as long as the individual was living or residing in a place not meant for human habitation, a safe haven, or an emergency shelter immediately before entering the institutional care facility;

(2) An individual who has been residing in an institutional care facility, including a jail, substance abuse or mental health treatment facility, hospital, or other similar facility, for fewer than 90 days and met all of the criteria in paragraph (1) of this definition, before entering that facility; or

(3) A family with an adult head of household (or if there is no adult in the family, a minor head of household) who meets all of the criteria in paragraph (1) or (2) of this definition, including a family



whose composition has fluctuated while the head of household has been homeless

**Describe the jurisdictions one-year goals and actions for reducing and ending homelessness including**

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

As ESG grantees and State ESG subgrantees, Continuum of Care organizations conduct homeless outreach through their local jurisdictions and set their funding priorities based on the outcome. IDHS collects information from its providers in the annual ESG application. The 2019 State ESG Allocation is \$4,935,064.

Fourteen of the Continuum of Care (CoCs) emphasized the value and importance of collaborating with other groups to educate and provide outreach for homeless services. These groups could include law enforcement, health care entities, mental health care providers, and housing organizations. Six CoCs explicitly reference street outreach programs. Four CoCs report using the HMIS system as a coordination and outreach strategy, in addition to using it as a coordinated assessment and intake process. Other strategies at least one CoC each included in their descriptions include using their Point-in-Time (PIT) counts; conducting an annual street survey; focusing on street outreach for youth; visiting tent cities and other temporary, informal shelters; adopting the VI-SPADT program; providing a homeless crisis response system; having a referral hotline in the community; providing strategically placed outreach offices; and, conducting tailored serious mental illness outreach.

DoA's Colbert Consent Decree Parties have an implementation plan to help coordinate agency services and ease the transition process for Class Members. The Consent Decree and Nursing Home Deflection Program work to prevent future people from entering the institutional system if it is unwanted. DHS' Williams Consent Decree Parties are also working on closing the front door to Institutes for Mental Disease and preventing inappropriate institutionalization in the future.

The ESG program expects to provide assistance to 1,500 homeless households in 2019

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

Housing relocation and stabilization services and short- and/or medium-term rental assistance provided as necessary to help individuals or families living in shelters or in places not meant for human habitation move as quickly as possible into permanent housing and achieve stability in that housing.

Illinois Continuum of Care (CoCs) are split between transitioning to and supporting Rapid Rehousing and Permanent Supportive Housing (PSH) programs and providing more emergency shelter and transitional housing. Eight CoCs mentioned their emergency shelters, some describing how the shelters are separated by demographic (men, women, families, youth, domestic violence, and veterans). Six CoCs

stated they had transitional housing services. Five CoCs emphasized PSH programs, four discussed diversion programs, and three CoCs stressed rapid rehousing. Other strategies mentioned included making landlords aware of homeless prevention strategies; sending housing providers to training sessions whenever possible; providing life skill services; creating a planning committee; and providing emergency fund assistance

The ESG program expects to provide assistance to 2,000 homeless households in 2019

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

Emergency solutions Grants provide services to aid homeless persons. Services funded include: case management, childcare, education services, employment assistance and job training, outpatient health services, legal services, life skills training, mental health services, substance abuse treatment services, transportation, and services for special populations. The ESG program expects to assist 16,000 Homeless Persons through overnight shelters in 2019

Half of the twenty Illinois Continua of Care (CoCs) state they use their coordinated assessment tools (often the HMIS system) to determine each resident's needs to prevent homelessness or maintain permanent supportive housing (PSH) or affordable housing. Nine CoCs emphasize the importance for enough PSH, so people in emergency shelters or transitional housing do not become homeless again. Other strategies listed include providing strong outreach for the available programs, having well-functioning emergency shelters and transitional housing, providing life skills training (such as financial literacy, credit improvement, and education), creating housing retention services to address each individual's situation, access to health care, education tenants and landlords on their subsequent rights, providing rapid rehousing, and focusing on initial homeless prevention.

State efforts to maintain PSH include the use of national HTF funds for the construction and rehab of PSH units. The State's Illinois Housing Search website also provides permanent supportive housing to persons experiencing or at risk of homelessness through its Statewide Referral Network units

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

## **employment, education, or youth needs**

Emergency Solutions Grants aim to provide services to prevent the individual or family from becoming homeless. Services funded include short or medium-term rental assistance and/or rental arrears, utilities, rental application fees, security deposits, last month's rent, utility deposits and payments, moving costs, housing search and placement, housing stability case management, landlord-tenant mediation, tenant legal services, and credit repair.

The majority of Illinois' Continua of Care (CoCs) provide services to homeless youth. Most of these services are focused around emergency shelter and transitional or temporary housing; however, some are working to provide permanent supportive housing (PSH) for youth. Eleven CoCs focus on PSH for the chronic homeless and nine focus on homeless veterans. At least a few CoCs provide emergency shelters, rapid rehousing, homeless prevention, transitional housing, and/or PSH for families. Other strategies to target certain populations include outreach for chronically homeless people; coordinated entry services for veterans; transportation to drop-in services for veterans; and, utility and deposit assistance for families and veterans.

DoA's Colbert Consent Decree Parties have produced an implementation plan to help coordinate agency services and ease the transition process for Class Members. The Consent Decree and Nursing Home Deflection Program (if continued) work to prevent future people from entering the institutional system if it is unwanted.

The Developmental Disability (DD) Division maintains a waiting list for DD Medicaid Waiver services. Homelessness is part of the criteria for immediate enrollment and receipt of DD Waiver services (if determined eligible). Local Independent Service Coordination (ISC) agencies under contract with the Division of DD maintain the waiting list of persons seeking DD Waiver services and make crisis determinations in the communities they serve. They work cooperatively with other public and private agencies to identify individuals with DD in need.

The Division of Mental Health (DMH) expanded permanent supportive housing to include project-based/clustered housing options using existing housing developments in Cook County. IDHS/DMH successfully implemented a Clustered Housing Model pilot on Chicago's north side of PSH units located in close proximity, in a building or buildings closely situated, with 24-hour peer support staff; a second Clustered Housing Model was implemented using a scattered sites, on Chicago's south side, targeting Williams Class Members deemed "Unable to Serve" (class members recommended for community transition, but the selected community provider cannot meet their clinical/support needs for one or more of the following service needs: financial, medical, medical/diabetes, medication management and/or psychiatric/behaviors). DMH conducted a six-tier initiative analyzing this population, to determine the reasons why certain Class Members are being categorized as Unable to Serve and what might be recommended to reduce that number. DMH also commissioned UIC to do a study on clients

who have returned to IMDs to better understand those circumstances

## **Discussion**

The ESG Program provides homeless prevention assistance funding to its sub-recipients on a two-year cycle under the Consolidated Plan. The ESG Program expects to provide homeless prevention assistance to 945 households in program years 2017 and 2018, using 2017 funding. 2017 funds under the homeless prevention program will be utilized for 24 months (2017 and 2018). Additional funding will not be issued under the homeless prevention program after year 2017.

Emergency Solutions Grants aim to provide services to aid homeless and at risk of homelessness persons and families. Services funded include: case management, childcare, education services, employment assistance, job training, outpatient health services, legal services, life skills training, mental health services, substance abuse treatment services, transportation, and services for special populations. The providers encourage individuals to gain stability within the community and their life by monitoring their progress and requiring certain goals to be made and attained.

See the AP 10 Section of this document for information on the State's Discharge Policy planning efforts

**AP-70 HOPWA Goals – 91.320(k)(4)**

| <b>One year goals for the number of households to be provided housing through the use of HOPWA for:</b>      |     |
|--|-----|
|  |     |
| Short-term rent, mortgage, and utility assistance to prevent homelessness of the individual or family        | 375 |
| Tenant-based rental assistance   | 87  |
| Units provided in permanent housing facilities developed, leased, or operated with HOPWA funds               | 0   |
| Units provided in transitional short-term housing facilities developed, leased, or operated with HOPWA funds | 73  |
| Total  | 535 |

## **AP-75 Barriers to affordable housing – 91.320(i)**

### **Introduction:**

Some ten (10) general statements and potential barriers were included in MA-40, the Market Analysis section of the Five-Year Plan. Discussion on: (1) Building Codes, (2) Home Rule, (3) Impact Fees, (4) Property Taxes, (5) Cost and Availability of Land, (6) Availability of Affordable Housing, (7) Public Housing, (8) Preservation, (9) Homelessness, and (10) Other Special Needs, were included to better describe the regulatory government under which affordable housing in Illinois currently operates.

### **Actions it planned to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment**

Actions Planned - These include the following: (1) Continued processing of Housing Affordability Impact Notes for relevant State legislation proposed in the Illinois General Assembly; IHDA processed 15 HAINs in 2018. (2) The Illinois Housing Locator system, ILHousingSearch.org continues to operate, allowing landlords to list available rental properties to prospective renters. By December 31, 2018, 7,684 landlords had registered 129,112 units throughout the state.

To assist in implementing the Local Planning Technical Assistance (LPTA) Act, IHDA continues to work with the State's Housing Task Force and other State agencies to research potential local comprehensive planning funding through an inter agency effort.

The State's Rental Housing Support Program helps Illinois families afford safe and decent homes by funding rent subsidies to landlords throughout the state to make rental units affordable to households who earn less than 30% of the area median income. A major program goal is to use half of the funding for households who are at 15% of the area median income and below. Funding for the Rental Housing Support Program is provided from a \$10 fee from real estate document recordings. Tenants pay a flat rent of approximately 30% of their income and the local administering agency pays the balance of the rent negotiated with the landlord. Outreach efforts include additional targeting to households who have a member with a Special Need in an effort to increase the likelihood of providing affordable housing for those households. 296 units were assisted in 2018

The national Housing Trust Fund will provide rental units affordable to extremely low income households at 30% or less of local AMI across the State

Affordable Housing Planning Appeals Act: IHDA, the administering agency of the AHPAA, produces the non-exempt local communities list every five years. In December 2018, forty-six non-exempt municipalities were identified. IHDA provides technical assistance to municipalities throughout the state to complete and submit affordable housing plans. These efforts include an AHPAA handbook for local

officials and administrators. Accessibility: Starting in 2015, IHDA has an "enhanced accountability" mandated requirement under its LIHTC Qualified Allocation Plan. All applicants must include at least 10% acceptable and 2% memory-impaired units in all projects. To encourage more widespread application, IHDA provides competitive points for utilizing Universal Housing Design (UHD) features.

### **Discussion:**

HUD's Homeless Continuum of Care funding has remained fairly steady. While the HEARTH Act requires 25% of funding to be used for permanent supportive housing development, this program isn't triggered until all renewal contracts/grant agreements are met, which has barely been the case since 2011. The Statewide Referral Network (SRN) lists over 1,600 affordable rental housing units for persons/households at 30% AMI or below and who are either homeless/at risk or have a disability. Improvements continue to be made to the system, including integration with the HUD Section 811 Project and Assistance Program. The national Housing Trust Fund will allow for increased production and rehab of additional units affordable to households at or below 30% AMI, and thus increase the State's inventory of Permanent Supportive Housing

## **AP-85 Other Actions – 91.320(j)**

### **Introduction:**

This section reviews additional actions the State is pursuing to address obstacles to meeting underserved needs, lead-based paint abatement, poverty, institutional structure, and monitoring among others.

IHDAs Office of Housing Coordination Services (OHCS) in its Strategic Planning and Reporting Division (SPAR) is responsible for issuing Certifications of Consistency with the State Consolidated Plan for covered programs. In doing so, the State will issue Certifications per the final rule as follows: a State Certification that an application is consistent with its housing strategy means that the State Action Plan indicates the State planned to apply for the program or was willing to support an application by another entity for that program; the location of activities is consistent with the geographic areas as specified in the plan; and the activities benefit a category of residents for which the State five-year strategy has an established priority. The State will provide the means for a denial if/when it fails to provide a Certification of Consistency

### **Actions planned to address obstacles to meeting underserved needs**

LIHTC: One way the state addresses obstacles to meeting its underserved needs is through its Low Income Housing Tax Credit (LIHTC) program. The LIHTC program assists in developing affordable housing for underserved populations by using indirect Federal subsidies to finance the development or redevelopment of affordable rental housing for low-income households (at 60 percent area median income or below). The Internal Revenue Service allocates federal tax credits to state housing finance agencies which then award tax credits to eligible affordable housing developers who use the equity capital generated from the sale of these tax credits to lower the debt burden on developing these tax credit properties, making it easier to offer lower, more affordable rents. Units must maintain affordable rent for at least 30 years.

There are two types of low income housing tax credits: 9 percent tax credits, and 4 percent tax credits. Nine percent tax credits (competitive tax credits) can subsidize up to 70 percent of the eligible development costs for new construction and substantial rehabilitation of housing projects that are not otherwise subsidized by the federal government. Four percent tax credits (non-competitive tax credits) can be used for rehabilitation projects and when 50 percent or more of a projects eligible cost are financed with tax-exempt private activity bonds.

The Qualified Action Plan (QAP) specifies how states will review, approve, and allocate federal Low Income Housing Tax Credits (LIHTCs). As the State's LIHTC allocating agency, IHDA coordinates the development of the annual Qualified Allocation Plan (QAP). Besides the program's already statutory targeting to households at 60% of area median income or below, IHDA has built a number of factors into its application scoring system to incentivize better targeting to lower-income households. These include



the following point categories: Rental Assistance; Larger Units; Green Building (lower utility bills); Rehabilitation (of existing housing); Community Revitalization Plans; 30% AMI Housing (10-15%); and Statewide Referral Network (SRN) units, which target 10-15% of a property's units to persons/households who are homeless/at-risk of homelessness or have a disability. All of these scoring criteria are aimed at incentivizing project applications which include deeper targeting to low- and moderate-income families.

The national Housing Trust Fund expands the State's ability to provide Extremely low-income households affordable rental housing across the State.

Additionally, Illinois' Supportive Living Program is an affordable assisted living model administered by the Department of Healthcare and Family Services that offers elderly (65 and older) or persons with physical disabilities (22 and older) housing with services. The aim of the Program is to preserve privacy and autonomy while emphasizing health and wellness for persons who would otherwise need nursing facility care. By combining apartment-style housing with personal care and other services, residents can still live independently and take part in decision-making.

The Department of Healthcare and Family Services currently operates this program through a Medicaid waiver which allows payment for services that are not routinely covered by Medicaid. These include personal care, homemaking, laundry, medication supervision, social activities, recreation and 24-hour staff to meet residents' scheduled and unscheduled needs. The resident is responsible for paying the cost of room and board at the facility. There are currently 153 supportive living facilities sites (12,777 units) located throughout Illinois

### **Actions planned to foster and maintain affordable housing**

July 16, 2015, HUD published the final rule on "affirmatively furthering fair housing". The rule encouraged a more engaged data-driven approach to assessing fair housing and planning actions, and established a standardized fair housing assessment and planning process to give State and local government jurisdictions and PHAs a more effective means to affirmatively further fair housing for the purposes of complying with the Fair Housing Act, a certification signed annually by all HUD grantees, including PHAs.

Formerly known as the Analysis of Fair Housing Impediments (AFHI), the new plan was renamed the Assessment of Fair Housing (AFH). For CDBG and HOME grantees, it was tied to the Consolidated Plan and was to be due prior to the submission of the grantee's next Five-Year Plan. PHAs, for the first time, were required to develop their own individual plans, or can become part of their jurisdiction's AFH. PHA assessments were the first to be due to HUD prior to submission of each PHA's next Five-Year Agency

Plan.

The first AFH was initially due approximately on February 15, 2019.

On January 5, 2018, HUD extended the deadline for submission of an AFH by local government program participants until the next Five-Year Plan that was due after October 31, 2020. However, on May 23, 2018, HUD issued three related Notices:

The first notice advised that HUD was withdrawing the January 5, 2018 Notice;

The second notice advised that HUD was withdrawing the Assessment Tool for Local Governments; and

The third notice advised that Consolidated Plan participants still must legally fulfil their obligation to affirmatively further fair housing by way of the Analysis of Fair Housing impediments (AFHI). Currently, States and all HUD grantees are not currently required to submit an AFH, but must continue to comply with existing obligations to affirmatively further fair housing. Until the State is required to submit an AFH, it will continue to provide its AFFH Consolidated Plan certification requirements and continue to report on the State's actions to address fair housing impediments in the State's Consolidated Plan Annual Performance Reports, IHDA has taken or plans to take further actions to facilitate the Analysis of Impediments. This includes; Identification of barriers based on data analysis and research on current laws, rules, and policies; and, describing possible State actions to address these areas; and, working with its other State partner agencies and other interested parties to provide more detail to its plans.

### **Actions planned to reduce lead-based paint hazards**

The Lead Poisoning Prevention Act (Public Act 94-0879) sets pre-emptive measures to prevent childhood lead-poisoning, including increased inspections of buildings suspected of containing lead hazards. The LPPA includes provisions barring owners of residential buildings who willfully violated lead safety laws from doing business with the State of Illinois or any State agency until the violation is mitigated, along with increased fines and mandatory notice to tenants of possible lead hazards in their building.

Significant changes strengthening the Illinois Lead Poisoning Prevention Act (LPPA) include classifying pregnant persons with elevated blood lead levels as subject to the same IDPH case management and environmental response as children, and clarification for the reporting of ALL blood-lead tests in Illinois, along with restrictions on data disclosure. IDPH is able to issue Emergency Stop Work Orders when public health is in jeopardy as the result of improper work activities disturbing lead bearing surfaces. Enforcement capabilities expanded in cases where violations of the LPPA and the Lead Poisoning Prevention Code (LPPC) have occurred, with penalty provisions bringing Illinois in compliance with U.S. EPA requirements for all authorized State programs. Language on lead reporting and lead work activities

includes physicians/healthcare providers, laboratories, schools, daycare providers, owners of regulated facilities with an identified lead hazard and both licensed and unlicensed construction industry professionals.

Illinois' Lead Safe Housing Advisory Council (LSHAC) is composed of advocacy groups, public health, state agency and industry representatives. The work of the LSHAC includes regulatory and legislative recommendations in the areas of screening and prevention, lead safe work practices, education, and funding for the remediation/rehabilitation of housing containing lead poisoning hazards. In response to recommendations in the LSHAC's report, Public Act 95-0492 became law, establishing the window replacement (CLEAR-WIN) program to prevent future cases of lead poisoning by assisting residential property owners reduce lead-paint hazards through window replacement in two pilot areas. An evaluation of CLEAR-WIN pilot program activities in Peoria and the Englewood community in Chicago by the University of Illinois/Chicago (UIC) for HUD exhibited a successful lead dust reduction of over 90% in the homes serviced. IDPH is examining steps to extend the program

The Illinois Department of Public Health (IDPH) convened the Lead Poisoning Elimination Advisory Council (LPEAC) to assist IDPH in developing the State's Lead Program Healthy Homes Strategic Plan, guiding lead poisoning elimination initiatives along with recommendations on enhancing participation from communities statewide. IDPH, along with the LPEAC, updated its Healthy Homes Strategic Plan to reflect the State's on-going, multi-faceted approach to lead poisoning prevention and expanding Healthy Homes issues

The Governor's Cabinet on Children and Youth convened October 3, 2016, identifying three initiatives designed to benefit the safety and well-being of Illinois' youth. Reducing the Childhood Lead Burden, a primary focus under the Cabinet, is designed to Improve Identification and Response to Lead-Poisoning and Lead Hazards; Ensuring Safe Homes; Developing Data Driven Solutions; Connecting to Social Services; and Prevention and Education. The concerted, eighteen month initiative has resulted in enhanced codes, and concerted, inter-agency response by IDPH, IHDA and DCEO. The State's 2019 Fiscal Year budget includes an additional \$15,000,000 For the CLEAR-WIN program

### **Actions planned to reduce the number of poverty-level families**

State of Illinois operates a variety of anti-poverty efforts coordinated with employment/training, housing assistance efforts, and other services. A brief summary follows:

(1) The HHS-funded Community Services Block Grant (CSBG) Program is the major federal-funded anti-poverty program, using Community Action Agencies (CAAs) to coordinate these anti-poverty efforts at the local level. In coordination with other subject-specific programs, efforts are geared to enabling low-income persons to become more self-sufficient. It is administered by DCEO at the State level, which funds the statewide network of CAAs and related organizations on an annual basis, contingent on federal funding. Uses of CSBG funds include the following: economic development; education; emergency assistance; health; housing; income management; linkages; nutrition; and self-sufficiency.

IHDA funds a number of local CAAs for housing rehabilitation programs.

(2)IDHS administers most of the State’s homeless assistance services programs. These have included the State-funded Homeless Prevention Program, and the Emergency & Transitional Housing Program, both of which have been partially, if not fully funded through the State’s Affordable Housing Trust Fund as well as with General Revenue Funds. It also administers the HUD-funded Emergency Solutions Grants Program, assisting local homeless services agencies with rehabilitation, operation/maintenance costs, essential services, and homeless prevention/rapid rehousing programs.

(3)DCEO administers the Low-Income Home Energy Assistance program (LIHEAP) as well as the Illinois Home Weatherization Assistance Program (IHWAP). Both provide utility subsidy assistance and weatherization improvements to low-income homeowners and renters.

(4)DCEO administered the DOL-funded Workforce Investment and Opportunity Act funding, which provides federal funding to workforce development boards (WDBs) across the state for local employment and job training programs. The State coordinated its efforts in this area by establishing Illinois Employment & Training Centers, which include staffing from WDBs, IDES-unemployment assistance and employment data and projections, and IDHS, to provide a one-stop shop for human services. IHDA also provided this information for LIHTC applicants who were working in Community Revitalization Areas to encourage them to include an economic development/employment and training componenet in their local plans.

5)IHDA continued to administer approximately 30% of the State’s Section 8 Project-Based Assistance properties since the program’s inception, most of which has partially or wholly financed those developments. IHDA regularly works with owners of “expiring properties” to encourage renewal of these rental assistance contracts by providing refinancing and rehabilitation assistance, often through tax-exempt bond financing and 4% Low Income Housing Tax Credits (LIHTCs) as well as HUDs/Treasurys Risk Sharing Program.

(6)IHDA administers the State-funded Rental Housing Support Program (RHSP), which targets rental assistance to households at 15-30% area median income. 296 units were assisted in 2018.

The Section 811 Program is specifically targeted to persons with disabilities who are coming out of institutional facilities and searching for community-based housing

### **Actions planned to develop institutional structure**

Public Act 100-0833, the Broadband Advisory Council Act created the Broadband Advisory Council under DCEO to expand broadband availability & access throughout Illinois, including unserved urban and rural areas. Steps for the BAC to initiate include literacy programs, programs assisting both older citizens, and the disabled, in accessing broadband; and the encouragement of collaborations with universities/colleges/public housing authorities and other agencies/organizations in furthering

access. The Act calls for the assessment of broadband access/barriers to Low-income households “at or below 135% of the poverty guidelines” (U.S. HHS), in comparison to other households. Key endeavors/improvements cited under the act are:

- Increased “functionality” of Educational resources/facilities for children and adults
- Civic Engagement
- Economic Development and Global Economy Access
- Health Care
- Aging in Place
- Farming Communities

The following actions are expected over the next 2 years:

1. Regular meetings of the Illinois Housing Task Force, its Executive Committee, its Interagency Committee, and related Working Groups to develop and implement the State’s Annual Comprehensive Housing Plan.
2. Combined meetings of the SPAR/OHCS Advisory Committee, Lt. Governor’s Rural Affairs Council (twice a year) and Rural Partners (as needed).
3. Ongoing assessment of training and technical assistance needs, and the provision of follow-up assistance through program workshops and other identified methods (IHDA, IDHS, IDHR, other agencies).
4. Development of informational materials on existing and revised Federal and State housing and support services programs via: dissemination of materials at various workshops and conferences; and dissemination of information on new federal and state programs, as they are created in Congress and/or the Illinois General Assembly and/or established or administered by State and local governments

### **Actions planned to enhance coordination between public and private housing and social service agencies**

State activities to enhance coordination between public and assisted housing providers and private and government health, mental health, services, and fair housing agencies has historically been the role of the Illinois Housing Task Force (IHTF) and its Inter-agency Committee.

Examples of coordination between public and private housing and social service agencies include:

1. IHDA has historically had a strong working relationship with private for-profit and non-profit affordable housing developers and owners, especially on the multi-family side. They are the major applicants under IHDA’s loan, tax credit, and rental assistance programs, including HOME, LIHTC, and Affordable housing Trust Fund programs. IHDA works closely with this group’s major membership organization, the Illinois Housing Council, to co-sponsor conferences and trainings,

as well as sharing information with its members on new program developments, major revisions, regulatory updates, and the like, via regular newsletters, websites, and related communications.

2. IHDA works with DCEO to coordinate funding for both rehabilitation and new construction rental housing developments being otherwise assisted.
3. IHDA also has had a longstanding working relationship with participating lending institutions, local governments, and non-profit organizations under its homebuyer mortgage financing and down payment assistance programs.
4. Both IHDA and DCEO work with local governments (and in IHDA's case also non-profit organizations) to administer local homeowner housing rehabilitation programs targeted to low/moderate –income households.
5. DCEO also works with local governments on funding and implementing local public works/infrastructure projects to address major health and safety concerns, especially of LMI households. It also works through local governments to fund needed economic development and related infrastructure projects for business expansions which create jobs for LMI persons.

IHDA has worked with homeless assistance agencies which frequently provide services to residents of permanent supportive housing projects which were funded in whole or in part with IHDA resources.

IHDA works with IDHS, IDoA, and IDHFS on the State's long-term care rebalancing strategy, which includes accessing community-based housing and rental assistance for persons exiting institutional housing facilities, including the creation of permanent supportive housing, Statewide Referral Network (SRN) units, and administering both the HUD section 811 PBRA Program and the Rental Housing Support Program. In addition, IDHS-DMH administers the Bridge Rental Subsidy Program for qualifying persons with mental illness who are also leaving Institutional residential settings. Please see the Long Term Care Rebalancing chart for additional information on the related court consent decrees and implementation of them, as well as the State's Money Follows the Person Program. The 3 previously-referenced agencies generally provide the services funding to allow these persons to live in community-based housing

## **Discussion:**

Under "Actions planned to foster and maintain affordable housing" other proposed IHDA actions:

1. Establishing a Limited English Proficiency Policy and Implementation Plan
2. Ongoing administration of the Affordable Housing Planning and Appeals Act Program
3. Providing targeted training on Reasonable Accommodations policy and practice; and
4. Continue inclusion of the 30% preference for Special Needs Tenants under IHDA's Rental Housing Support Program; and
5. Fund technical assistance to IHDA property managers on HUD's new Equal Access Rule for LGBT persons

Supporting uncapped use of national Housing Trust Fund monies to be used for operating

rental/assistance for housing for extremely low income households

## Program Specific Requirements

### AP-90 Program Specific Requirements – 91.320(k)(1,2,3)

#### Introduction:

HOME funds target low- and very-low-income households. Funds will be initially targeted statewide to those areas that do not receive direct allocations of HOME Program funds from HUD. Under the 2015-2019 Consolidated Plan, IHDA is only utilizing HOME funding for rental housing development/rehabilitation

#### Community Development Block Grant Program (CDBG)

##### Reference 24 CFR 91.320(k)(1)

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

|  |          |
|--|----------|
| 1. The total amount of program income that will have been received before the start of the next program year and that has not yet been reprogrammed  | 0        |
| 2. The amount of proceeds from section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives identified in the grantee's strategic plan. | 0        |
| 3. The amount of surplus funds from urban renewal settlements  | 0        |
| 4. The amount of any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan   | 0        |
| 5. The amount of income from float-funded activities   | 0        |
| <b>Total Program Income:</b>   | <b>0</b> |

#### Other CDBG Requirements

|   |           |
|---|-----------|
| 1. The amount of urgent need activities   | 2,000,000 |
| 2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan. | 0.70%     |

#### HOME Investment Partnership Program (HOME)

##### Reference 24 CFR 91.320(k)(2)

1. A description of other forms of investment being used beyond those identified in Section 92.205 is



as follows:

The Authority may invest HOME funds as equity investments, interest-bearing loans, non interest-bearing loans, interest subsidies consistent with the purposes of this part, deferred payment loans, grants, or other forms of assistance that HUD determines to be consistent with the purposes of this part.

2. A description of the guidelines that will be used for resale or recapture of HOME funds when used for homebuyer activities as required in 92.254, is as follows:

While IHDA Multi-family HOME funds are restricted to rental properties, in the event that HUD has requested that the Lender return to HUD all or any portion of the proceeds of the HOME Loan (the "Recapture") that have been disbursed to or for the benefit of the Borrower, the Borrower shall provide such funds to satisfy the Recapture as requested by the Lender, unless recapture is due solely to the actions of the Lender. The occurrence of any Default that has not been cured during any applicable grace or cure period shall give rise to a Recapture. The Borrower agrees to indemnify against and pay IHDA for any damages related to any Recapture that is due and owing. The Borrower must also agree to full and prompt payment, when due, of the Recapture, plus all costs and expenses of collection and default interest as provided in the Financing Documents. The Borrower also agrees to indemnify against and pay IHDA for any damages related to any Recapture that is due and owing.

The HOME regulations require that a house purchased with HOME funds must be kept affordable for an extended period of time through recapture provisions which have been determined by HUD to be appropriate. The period of affordability is based upon the HUD guidelines for amount of HOME funds per unit and is based on the amount of direct subsidy provided to the homebuyer. Direct subsidy is defined as the amount of assistance provided for down payment and closing costs for homebuyers receiving assistance in the homebuyer only program. For Homebuyers receiving funds for homebuyer with rehabilitation assistance, direct subsidy is the amount of assistance provided for down payment and closing costs plus the difference between fair market value before rehab and fair market value after rehab. See below for affordability provisions.

| HOME FUNDS PROVIDED | AFFORDABILITY PERIOD |
|---------------------|----------------------|
|---------------------|----------------------|

|                   |          |
|-------------------|----------|
| <\$15,000         | 5 Years  |
| \$15,000-\$40,000 | 10 Years |
| >\$40,000         | 15 Years |

3. A description of the guidelines for resale or recapture that ensures the affordability of units acquired

with HOME funds? See 24 CFR 92.254(a)(4) are as follows:

For single-family programs funded with HOME funds IHDA uses a recapture/repayment approach in lieu of a resale approach. Under the 2015-2019 Consolidated Plan, IHDA is only utilizing HOME funding for rental housing development/rehabilitation.

For IHDA multi-family, HOME funds are restricted to rental properties. Recapture is triggered by sale or transfer and only direct subsidy to the buyer may be recaptured. The Authority has established loan restrictions which enable recapture of the HOME subsidy out of net proceeds. The HOME investment amount may be reduced pro rata based on the time the homeowner has owned and occupied the unit measured against the required affordability period. Net proceeds are defined as the sales price minus loan repayment of superior debt and closing costs. The recapture provisions will be included in a recorded recapture agreement for each unit assisted with HOME funds.

The owner occupied provision of assistance to the homeowner must remain in effect throughout the affordability period. The owner may not relocate and rent their property. Nor may they rent a portion of their property. Violation of the provision will trigger a recapture of all funds not forgiven as of the date of the violation.

While IHDA multi-family HOME funds are restricted to rental properties, in the event that HUD has requested that the Lender return to HUD all or any portion of the proceeds of the HOME loan (the "Recapture") that have been disbursed to or for the benefit of the Borrower, the Borrower shall provide such funds to satisfy the recapture as requested by the Lender, unless such Recapture is due solely to the actions of the Lender. The occurrence of any Default that has not been cured during any applicable grace or cure period shall give rise to a recapture.

The Borrower agrees to indemnify against and pay IHDA for any damages related to any Recapture that is due and owing. The borrower must also agree to full and prompt payment when due of the Recapture, plus all costs and expenses of collection and default interest as provided in the Financing Documents. The borrower also agrees to indemnify against and pay IHDA for any damages related to any Recapture that is due and owing

4. Plans for using HOME funds to refinance existing debt secured by multifamily housing that is rehabilitated with HOME funds along with a description of the refinancing guidelines required that will be used under 24 CFR 92.206(b), are as follows:

For IHDA funding, any proposed rehabilitation project must receive initial approval as part of the Preliminary Project Assessment (PPA). Once approved, the sponsor will submit a full "Common Application" to the Authority including a Property Needs Assessment (PNA), appraisal, and environmental reports to complete the HUD ERR. The inclusion of a PNA indicates that rehabilitation is the primary activity of the proposed development. IHDA's "Standards for Architectural Planning

and Construction"(APCS) and the "Common Application" define the threshold factors and cost parameters for rehab projects, in addition to those for new construction. As part of the PPA, a proposed project must also indicate whether, and how, the proposed investment will change the number of affordable units, and unit affordability. The PPA must be approved before a proposed project may be submitted via the "Common Application". Also see HOME Addendums 1 (HOME Provisions) and 2 HOME Rehabilitation Standards) of IHDA's "Standards for Architectural Planning and Construction".

Any proposed HOME refinance would be subject to IHDA's application process and subject to the Financial Feasibility review contained within IHDA "Multi-Family Common Application", to ensure compliance with Multi-family underwriting guidelines. The Financial Feasibility component of the "Common Application" assesses whether disinvestment has occurred, and whether the proposed project has the ability to serve the project's targeted population in the long-term. The PPA, PNA, Standard for Construction Cost Estimate (SCCE), "Mandatory Application Checklist", "MF Common Application", the APCS and other relevant HOME application manuals, guidelines, and other publications describing the application criteria are found on the IHDA website at: <https://www.ihda.org/developers/dev-resource-center>.

Periods of affordability comply with 24CFR 92.252: Rehabilitation of existing housing per unit of HOME funds under \$15,000 - 5 years minimum affordability; \$15,000 - \$40,000 10 years minimum affordability; over \$40,000 or rehabilitation involving refinancing - 15 years minimum affordability.

HOME funds cannot be used to refinance multifamily loans made or insured by any federal program, including the Community Development Block Grant Program

### **Emergency Solutions Grant (ESG) Reference 91.320(k)(3)**

1. Include written standards for providing ESG assistance (may include as attachment)

To collaborate with the Continuum of Care's (CoC's), applications will be sent annually to obtain CoCs funding recommendations. Applications from CoCs and subrecipients will be reviewed by ESG staff, determinations will be made and award letters will be distributed. Awards will be made based upon release of funds from HUD. All DHS grant terms are July 1st through June 30th. For complete written standards please refer to the IDHS website at <http://www.dhs.state.il.us/page.aspx?item=77857>

2. If the Continuum of Care has established centralized or coordinated assessment system that meets HUD requirements, describe that centralized or coordinated assessment system.

The State of Illinois is not a Continuum of Care organization. There are 20 CoC organizations within

the State that address this issue independently

3. Identify the process for making sub-awards and describe how the ESG allocation available to private nonprofit organizations (including community and faith-based organizations).

The Continuum of Care organizations provide a funding plan describing the performance measures and how those measures will be achieved. They also provide recommended funding by activity and agency within their CoC.

4. If the jurisdiction is unable to meet the homeless participation requirement in 24 CFR 576.405(a), the jurisdiction must specify its plan for reaching out to and consulting with homeless or formerly homeless individuals in considering policies and funding decisions regarding facilities and services funded under ESG.

The State of IL requires that all entities receiving ESG funds have a homeless or formerly homeless individual on their board or their policymaking entity.

5. Describe performance standards for evaluating ESG.

#### **ESG Performance Standards**

100% of all subrecipients of ESG Program funds:

- must ensure that all ESG funds are used in accordance with all federal program requirements at 24 CFR Part 576
- must comply with DHS policies, reporting requirements, community service agreement obligations, department regulations, and deliverables in addition to all the ESG requirements in 24 CFR Part 576
- are required to complete and submit accurate and timely annual Funding Applications that include but are not limited to providing staffing levels, program data, supportive service, and fiscal information in addition to submitting all requested attachments and certifications to DHS on or before the application deadline date
- will be limited to 60% of the agency's total fiscal year allocation for street outreach and emergency shelter activities as set forth in 24 CFR Part 576
- must provide matching contributions from eligible sources in an amount equal to the amount of requested ESG Program funds from the subrecipient for all activities as prescribed in 24CFR Part 576. At a minimum, 50% of the match contributions must be cash
- must obtain written approval from DHS prior to subgranting any portion of ESG Program funds to any other entity to perform ESG eligible activities
- must obtain written agreements from all ESG subgrantees requiring the subgrantee to comply with all DHS policies and timelines, the provisions of the DHS community service agreement, and all program rules and regulations as set forth by DHS and 24 CFR Part 576, which is identical to the obligations of the ESG subrecipients

- must provide DHS with accurate quarterly fiscal and service ESG reports on a quarterly basis

100% of all ESG funded buildings or facilities (other than a privately owned residential structure) are required by ESG regulations to comply with the American Standard Specifications for Making Building and Facilities Accessible to, and Usable by, the Physically Handicapped”, Number A-117.1P 1971, unless subject to the exceptions contained in 41 CFR 101-19.604

**Housing Trust Fund (HTF)**  
**Reference 24 CFR 91.320(k)(5)**

1. How will the grantee distribute its HTF funds? Select all that apply:

☒ Applications submitted by eligible recipients

2. If distributing HTF funds through grants to subgrantees, describe the method for distributing HTF funds through grants to subgrantees and how those funds will be made available to state agencies and/or units of general local government. If not distributing funds through grants to subgrantees, enter “N/A”.

N/A

3. If distributing HTF funds by selecting applications submitted by eligible recipients,

a. Describe the eligibility requirements for recipients of HTF funds (as defined in 24 CFR § 93.2). If not distributing funds by selecting applications submitted by eligible recipients, enter “N/A”.

Eligible recipients include an organization, agency, or other entity (including a public housing agency, or a for-profit entity or a nonprofit entity) that receives HTF assistance from a grantee as an owner or developer to carry out an HTF-assisted project. The requirements below are verified during the review process and a certification is issued by the IHDA Development Team. A recipient must:

b. Describe the grantee’s application requirements for eligible recipients to apply for HTF funds. If not distributing funds by selecting applications submitted by eligible recipients, enter “N/A”.

IHDA will use its Multifamily Financing “Common Application” as the major application format for national HTF rental housing projects, the same one used for the LIHTC and HOME programs, along with supplemental information required by program rules (see attached Permanent Supportive Housing Development Program Request for Application). IHDA’s process will include an initial completeness/eligibility scoring, review of mandatory requirements, underwriting, site and market review, peer review, internal Loan Committee and IHDA Board approval. National HTF funds will only be applied to units restricted to tenants at 30% AMI or below. The balance of the units that are not 30% AMI or below will be paid for with other IHDA or leveraged sources

c. Describe the selection criteria that the grantee will use to select applications submitted by eligible recipients. If not distributing funds by selecting applications submitted by eligible recipients, enter “N/A”.

If an applicant meets the mandatory thresholds above, IHDA will review eligible recipients in accordance with CFR 91.320 (k)(5)(i), which will include supplemental information required by program rules (see Permanent Supportive Housing Development Program RFA) In addition to the review of mandatory requirements, IHDA’s process will include an initial completeness/eligibility scoring, underwriting, site and market review, peer review, internal Loan Committee and IHDA Board approval.

d. Describe the grantee’s required priority for funding based on geographic diversity (as defined by the grantee in the consolidated plan). If not distributing funds by selecting applications submitted by eligible recipients, enter “N/A”.

The State will distribute HTF funds statewide, including the City of Chicago, Chicago Metro, Other Metro, Non-Metro and municipalities subject the Affordable Housing Planning and Appeal Act to the prioritizing applications that are consistent with the 2015-2019 Consolidated Plan, Section AP-50 Geographic Distribution. The Authority puts a high value on quality location of projects and availability of resources and access to amenities. IHDA will strive to achieve maximum geographic diversity based on statewide applications and, where applicable, aligning set-asides associated with other programs providing non-federal, leveraged funding to the NHTF, rather than establish geographic set asides under the NHTF. In an effort to increase geographic diversity, IHDA provides application workshops in different locations throughout the state

e. Describe the grantee’s required priority for funding based on the applicant's ability to obligate HTF funds and undertake eligible activities in a timely manner. If not distributing funds by selecting applications submitted by eligible recipients, enter “N/A”.

As stated in the attached RFA Section 3, Paragraph N, the Authority will evaluate the Development Team's capacity to successfully complete and manage the Project. Applicants who fail to meet these mandatory criteria will be disqualified and will not be scored during the final evaluation phase. Applications must include the following for the Authority to evaluate the experience and capacity of the development team:

#### Organizational Flow Chart

- The Application must include a full organizational chart reflecting all entities within the proposed Owner down to individuals including percentages of ownership

#### Identity of Interest Certification

- The Application must include an Identity of Interest form for the Sponsor

#### Development Team Certification

- The Application must include certifications for the proposed owner, general contractor, property manager, and architect, inclusive of all pending, under construction, or completed Projects in any state, including their present status and expected completion date. The Development Experience Certification forms are available on the Authority's Website

#### Unacceptable Practices

The Authority may deny any Project in which any Participant in the Development Team has failed to demonstrate ongoing proficiency with affordable and supportive housing programs. The Applicant may include in the Application an explanation of the circumstances surrounding the unacceptable practice and the roles of each of the Participants. Examples of unacceptable practices include but are not limited to:

- A Participant is affiliated with existing developments which have been cited for material and/or continuing, but curable, noncompliance. Material noncompliance exists when a party exhibits a continual pattern of noncompliance, or when a party demonstrates an inability or an unwillingness to resolve noncompliance in a timely manner
- A Participant (including any affiliates) has experienced any events of foreclosure or failed to perform under the terms of a workout agreement over the past three (3) years
- A Participant (including any affiliates) has declared bankruptcy over the past three (3) years
- Any Participant (including any affiliates) has a mortgage default or arrearage of three months or more within the last three (3) years
- A Participant that has failed to pay any fee or expense due to the Authority, including

outstanding compliance monitoring fees in the past three (3) years

- Any liens or other claims exist against property owned by Owner (including any affiliates) for which the Owner has failed to resolve a public filing such as a lien or a judgment
- The Owner (including any affiliates) has been debarred or received a limited denial of participation in the past three (3) years by any federal or state agency from participating in any development program
- A Participant that has materially misrepresented facts on any request for Authority resources

f. Describe the grantee's required priority for funding based on the extent to which the rental project has Federal, State, or local project-based rental assistance so that rents are affordable to extremely low-income families. If not distributing funds by selecting applications submitted by eligible recipients, enter "N/A".

As stated in the attached RFA Section 4, Paragraph B, projects that provide project-based rental or operating assistance will be awarded up to twenty-five (25) points based on the number of units assisted and the length of committed assistance. Units can be assisted with available federal, State, and local project-based rental assistance so that rents are affordable to ELI families. These may include: Section 8 Project-Based (preservation only); Project-Based Vouchers; Rental Housing Support Program; and Section 811 Project-Based Rental Assistance. It will utilize 30% of household income for rents and utilities as its standard.

g. Describe the grantee's required priority for funding based on the financial feasibility of the project beyond the required 30-year period. If not distributing funds by selecting applications submitted by eligible recipients, enter "N/A".

As stated in the attached RFA Section 3, Paragraph 9, all applicants must document the extent to which proposed rents are affordable, especially to ELI households. All projects will be required to establish a minimum 30-year affordability period. Applicants who fail to meet these mandatory criteria will be disqualified and will not be scored during the final evaluation phase.

As stated in the attached RFA Section 5, Paragraph H, Projects will be required to execute a Regulatory Agreement with the Authority, whereby the Owner shall agree to maintain unit affordability, and serve the targeted populations, for a minimum 30-year period



h. Describe the grantee's required priority for funding based on the merits of the application in meeting the priority housing needs of the grantee (such as housing that is accessible to transit or employment centers, housing that includes green building and sustainable development features, or housing that serves special needs populations). If not distributing funds by selecting applications submitted by eligible recipients, enter "N/A".

As stated in the attached RFA Section 3, Paragraph B, all applications must include a certification of consistency with the Consolidated Plan for the Project. The projects must target populations and prioritize activities that are consistent with the States 2015-2019 Consolidated Plan and the State's Comprehensive Planning Act. Proposed projects must also fall under one of the state's Focus Areas in its annual plan, which are supportive housing, community revitalization, and economic development. Applicants who fail to meet this mandatory criteria will be disqualified and will not scored during the final evaluation phase.

Projects will also be scored on the following items that meet the housing needs of the State. See attached RFA Section 4 for information on Application Scoring Criteria.

- SRN Units - Up to ten (10) points
- Universal Design - Up to ten (10) points
- Green Design and Energy Efficiency - Up to five (5) points
- Access to Transportation - Up to ten (10) points
- Neighborhood Characteristics and Amenities - A maximum of five (5) points

i. Describe the grantee's required priority for funding based on the extent to which the application makes use of non-federal funding sources. If not distributing funds by selecting applications submitted by eligible recipients, enter "N/A".

Projects which are able to commit other non-federal funds as part of their project financing will be awarded up to twenty-five (25) points. This would include other State-funded and locally funded programs, but not LIHTC, or State or local CDBG or HOME funding. The latter funds can be part of the project's financing, but will not be considered as non-federal funding. Please note that there is no State or local match requirements for NHTF, but IHDA anticipates most NHTF-funded projects will be highly leveraged

4. Does the grantee's application require the applicant to include a description of the eligible activities to be conducted with HTF funds? If not distributing funds by selecting applications submitted by eligible recipients, select "N/A".

Yes

5. Does the grantee's application require that each eligible recipient certify that housing units assisted with HTF funds will comply with HTF requirements? If not distributing funds by selecting applications submitted by eligible recipients, select "N/A".

Yes

**6. Performance Goals and Benchmarks.** The grantee has met the requirement to provide for performance goals and benchmarks against which the grantee will measure its progress, consistent with the grantee's goals established under 24 CFR 91.315(b)(2), by including HTF in its housing goals in the housing table on the SP-45 Goals and AP-20 Annual Goals and Objectives screens.

Yes

**7. Maximum Per-unit Development Subsidy Amount for Housing Assisted with HTF Funds.**

Enter or attach the grantee's maximum per-unit development subsidy limits for housing assisted with HTF funds.

The limits must be adjusted for the number of bedrooms and the geographic location of the project. The limits must also be reasonable and based on actual costs of developing non-luxury housing in the area.

If the grantee will use existing limits developed for other federal programs such as the Low Income Housing Tax Credit (LIHTC) per unit cost limits, HOME's maximum per-unit subsidy amounts, and/or Public Housing Development Cost Limits (TDCs), it must include a description of how the HTF maximum per-unit development subsidy limits were established or a description of how existing limits developed for another program and being adopted for HTF meet the HTF requirements specified above.

The Housing Trust Fund Allocation Plan also must include the State's policy on maximum per-unit subsidy, which is to be based on modest housing units with similar amenities and taking into account local market conditions. IHDA will use the same criteria that it uses under its Qualified Allocation Plan (QAP). These limits will be based on hard construction costs, and are adjusted by bedroom size and location. Location factors in to the variance between the Chicago and metro set asides and separating other metro and non-metro set asides.

These standards were established by an analysis of the current Construction Cost Database for issuance with the 2016-2018 QAP. This analysis showed the largest variance between Chicago and metro versus

other metro and non-metro. There was a smaller variance between Chicago and metro and a larger variance between Chicago and the remaining regions of the State. IHDA will provide non-federal funds to areas where needed, to bridge gaps between maximum per-unit costs under the national HTF and actual construction cost within IHDA's Cost Limits. See attached "20\_\_ Hard Cost Limits for IHDA's Cost Limits.

The total cost per unit takes into consideration soft costs, which are based on the statewide cap, and will not exceed 20% of allowable hard costs for this program. The total cost will be based on geographic location as explained above.

**8. Rehabilitation Standards.** The grantee must establish rehabilitation standards for all HTF-assisted housing rehabilitation activities that set forth the requirements that the housing must meet upon project completion. The grantee's description of its standards must be in sufficient detail to determine the required rehabilitation work including methods and materials. The standards may refer to applicable codes or they may establish requirements that exceed the minimum requirements of the codes. The grantee must attach its rehabilitation standards below.

In addition, the rehabilitation standards must address each of the following: health and safety; major systems; lead-based paint; accessibility; disaster mitigation (where relevant); state and local codes, ordinances, and zoning requirements; Uniform Physical Condition Standards; and Capital Needs Assessments (if applicable).

IHDA uses the attached Architectural Planning and Construction Standards (APCS), to evaluate all rehabilitation projects. The APCS is a comprehensive reference for owners, developers, architects and contractors in the design and construction of quality affordable housing. IHDA uses the standards to evaluate plans, specifications and other relevant data of the proposed new construction, rehabilitation and adaptive reuse of existing buildings.

- Applicable State and local code, ordinances and zoning requirements
- Health and Safety
- Requirements of useful life of major systems
- Lead based Paint Requirements
- Accessibility Standards which must be met
- Disaster mitigation requirements
- State and Local Codes, Ordinances, and Zoning Requirements
- Uniform Physical Condition Standards

*Disaster Mitigation* - The State of Illinois does not maintain a statewide adopted building code. Each local governmental unit (municipality or county) adopts its own individual building or other administrative code. IHDA relies on these local Authorities Having Jurisdiction (AHJ) to provide plan review and issue building permits per their adoptive standards. If there is an area which does not have an adopted standard, our APCS document indicates the building shall be constructed to meet the 2015 version of the International Building Code. The use of standard building codes, by either the AHJ or IHDA referenced standard, ensures facilities are built to handle regional requirements for seismic (earthquake), wind (tornado or straight line winds) or water (rain, snow, flood) based disasters. By the AHJ issuing the building permit it is expected the plans have been reviewed against the local standard outlined in their adopted building codes, and meet these requirements.

*UPCS Protocols* - An IHDA Construction Representative will make a visit to each unit and evaluate the site against the attached UPCS checklist (see attached Uniform Physical Condition Standards for Multifamily Housing Rehabilitation) to ensure they meet with minimum requirements. The checklist will be used in conjunction with the previously completed Property Needs Assessment (see attached PNA) to establish the minimum scope to be included with any rehabilitation project approved for funding. This checklist has been created to have separate lists for multi-family dwellings and single family homes.

The UPCS checklist shall identify any repair items that represent an immediate threat to health and safety, and all other significant defects, deficiencies, items of deferred maintenance, and material building code violations that would limit the expected useful life of major components or systems. Deficiencies regarding significant life safety issues must be identified and identified as work to be immediately corrected as part of the scope of work.

Post-occupancy, IHDA's Asset Management Services Department will review the ongoing project needs utilizing HUD's Uniform Physical Condition Standards to ensure HTF-assisted projects and units will be decent, safe, sanitary and in good repair as described in 24 CFR 5.703

**9. Resale or Recapture Guidelines.** Below, the grantee must enter (or attach) a description of the guidelines that will be used for resale or recapture of HTF funds when used to assist first-time homebuyers. If the grantee will not use HTF funds to assist first-time homebuyers, enter "N/A".

N/A

**10. HTF Affordable Homeownership Limits.** If the grantee intends to use HTF funds for homebuyer assistance and does not use the HTF affordable homeownership limits for the area

provided by HUD, it must determine 95 percent of the median area purchase price and set forth the information in accordance with §93.305. If the grantee will not use HTF funds to assist first-time homebuyers, enter "N/A".

Any limitation or preference must not violate nondiscrimination requirements in § 93.350, and the grantee must not limit or give preferences to students. The grantee may permit rental housing owners to limit tenants or give a preference in accordance with § 93.303(d)(3) only if such limitation or preference is described in the action plan.

Under IHDA's LIHTC Program, developers/owners are incentivized to set aside 10-15% of their housing units for supportive housing populations under the Statewide Referral Network (SRN). These are defined as persons with disabilities or homeless/at risk of homelessness AND @ 30% of AMI or below. This set-aside may be triggered if a national HTF project is also allocated LIHTC's as part of its project financing.

**12. Refinancing of Existing Debt.** Enter or attach the grantee's refinancing guidelines below. The guidelines describe the conditions under which the grantee will refinance existing debt. The grantee's refinancing guidelines must, at minimum, demonstrate that rehabilitation is the primary eligible activity and ensure that this requirement is met by establishing a minimum level of rehabilitation per unit or a required ratio between rehabilitation and refinancing. If the grantee will not refinance existing debt, enter "N/A."

Not Applicable: IHDA anticipates funding primarily new affordable housing development, and it will not give priority to such preservation projects which are primarily refinancing existing debt. If refinancing will only be permitted when:

- New investment is being made to create additional affordable units;
- refinancing is necessary to reduce the overall housing cost and to make the housing more affordable, and is proportional to the number of HTF-assisted units in the rental project; and
- the development cost attributable to the HTF units is greater than the amount of debt to be refinanced that is attributable to the HTF units.
- The review of the management practices of the applicant must demonstrate that any proposed rehabilitation is not a result of disinvestment in the property

#### **Discussion:**



