

Memorandum

TO: Interested Parties

FROM: Bill Pluta, Director
Office of Housing Coordination Services
Strategic Planning and Reporting (SPAR) Department

CC: Audra Hamernik, Executive Director

RE: **General Requests for Certification of Consistency with the State Consolidated Plan (ConPlan); HEARTH Act Continuum of Care FFY 2019 Program Process**

DATE: August 7, 2019

As you may know, applications for many HUD-funded competitive grant programs (reference 24 CFR Part 91, Subpart F), especially those covered under HUD's Notices of Funding Availability (NOFAs), must include a Certification of Consistency with the State or local Consolidated Plan as a pre-requisite to HUD's acceptance of an application. The applicant entity is to obtain this certification from the lowest level of government that has an approved Consolidated Plan covering the jurisdiction in which the proposed project(s) will be located. To provide guidance for obtaining Certifications of Consistency for proposals that fall under the State Consolidated Plan coordinated by IHDA, this memo serves to establish standardized procedures for the submittal and review of such requests.

I. Determining the jurisdiction to request a Consolidated Plan Certification of Consistency

In addition to states, the following types of local governments are required to submit a Consolidated Plan as a condition of HUD formula grant funding for a fiscal year:

- A Metropolitan City or Urban County that directly receives funds under the Community Development Block Grant (CDBG) Entitlement Program.
- A city or county that will be a "Participating Jurisdiction" (i.e., local direct grantee from HUD) under the HOME program.
- A Consortium formed for the purpose of participating directly with HUD in the HOME program.

Local jurisdictions that only receive CDBG, HOME, or Emergency Solutions Grants Program (ESG) funds through participation in a State-administered program (i.e., from DCEO, IHDA, or IDHS) are not required to submit a Consolidated Plan to HUD or to the State for the purpose of that funding, but may be required to submit a local Certification of Consistency for others (example: for IHDA Low Income Housing Tax Credit (LIHTC) projects proposed in CDBG Entitlement areas). See [Attachment A](#) for a statewide listing of communities that are required to submit local Consolidated Plans. Projects in all other local government

jurisdictions fall under the State's Consolidated Plan.

To determine whether the particular program being applied for requires a Consolidated Plan Certification of Consistency, please refer to the program guidelines and NOFA regulations, which HUD publishes in the Federal Register for each particular program.

II. Submit request if applicable

The applicant entity must complete and submit a detailed description for each project that addresses all of the items on IHDA's attached Review Checklist (See Attachment B). The applicant entity is encouraged to submit its final proposal to IHDA's Strategic Planning and Reporting (SPAR) Department at its earliest possible convenience before said application is due to HUD. Also, please respond to **all** sections regarding required information.

- Project List
- Project Description
- Review Checklist to ensure Consistency with the State Consolidated Plan

III. IHDA review procedures

The procedures for reviewing and processing an applicant entity's proposal to certify consistency with the State's Consolidated Plan are set up as a very straightforward and streamlined process. Here are the chronological steps:

- A. Upon receipt of a proposal, SPAR staff will review the same, using the standardized review form (see Attachment B). If said application appears to be consistent, the reviewing staff person shall prepare the Certification.
- B. The Certification will then be presented to IHDA's Executive Director for signature. A minimum of 2-3 working days is needed here to ensure that the Executive Director is available to review and sign the required Certification. The applicant entity is encouraged to submit its final proposal to IHDA's Strategic Planning and Reporting (SPAR) Department at its earliest possible convenience before said application is due to HUD.
- C. IHDA cannot guarantee review and certification of program or project applications which are received less than three (3) working days before HUD's application deadline, especially those which may be required to be submitted to HUD Headquarters in Washington, D.C., as all certifications must be signed by our Executive Director.
- D. The Certification will be mailed to the applicant unless otherwise instructed. It is the applicant's responsibility to determine and request the appropriate routing of the document and inform IHDA of the same. **IHDA will not be responsible for Overnight/Express mailing or hand-delivery of such documents to the HUD Regional Offices or Headquarters.**
- E. IHDA's review of projects for Certification of Consistency with the State Consolidated Plan is not intended to serve as or replace a completeness/eligibility screening of such applications and proposals. If concerns or problems are identified during the review of same, IHDA staff will attempt to notify the applicant of those matters. It will be the applicant's responsibility to resolve them.

IV. HEARTH Act/Continuum of Care Applications

Please note that HUD's homeless assistance funding (per the HEARTH Act) requires only **ONE** Certification of Consistency with the State Consolidated Plan be submitted per Homeless Continuum of Care (CoC) agency. Each CoC must provide a list of all projects (new and renewal) on a separate form when requesting certifications (See [Attachment C](#)). A narrative and checklist is required for **each project**. Also, include the name of the lead contact for the CoC on each project description. It is incumbent on the applicant to provide adequate time for such reviews prior to HUD's application deadline. Please also note that HUD's policies, eligibility, evaluation, and application review/scoring processes are included in extensive detail in the current NOFA, which was posted on HUD's website on July 3, 2019. Below is a summary of its major highlights, with NOFA pages referenced where applicable:

- HUD's major focus of this NOFA is to encourage communities to pursue evidence-based approaches to end veteran, chronic, family, and youth homelessness and to use their data to strategically target their available resources to end homelessness. The NOFA also states that HUD's goal is to provide funding for efforts by nonprofit providers, states, and local governments to quickly rehouse homeless individuals, families, persons fleeing domestic violence, dating violence, sexual assault, and stalking, and youth while minimizing the trauma and dislocation caused by homelessness. It also promotes access to and effective utilization of mainstream programs by homeless individuals and families, as well as optimizing self-sufficiency among those experiencing homelessness.
- HUD's policy priorities for FFY 2019 funding are as follows: ending homelessness for all persons; creating a systemic response to homelessness; strategically allocating and using resources; using an evidence-based approach; increasing employment; and providing flexibility for Housing First with Service Participation requirements (pp.5-6).
- Eligible Applicants (pp. 3-4 and p. 24) are clearly defined, as is Program Participant Eligibility (p. 12-13).
- Consolidated Plan Certifications of Consistency are also detailed (p. 3, p. 16, and p. 40).
- The types of eligible projects include: Rapid Re-Housing; Joint Transitional and Permanent Housing; Supportive Services Only projects for Coordinated Entry; and HMIS. Regardless of the type of project that the CoC applies for, the grant term must be one year. In addition, CoCs may not request funds for homeless prevention. (pp. 7 and p. 22).
- All CoC applicants/grantees must provide the 25% HUD-required match (p. 28).
- This NOFA contains a detailed description of Continuum of Care Program requirements, including those for new and renewal projects (pp. 13-23).
- HUD's application evaluation rules are described, and include Past Performance, Statutory/Regulatory Requirements, and Threshold Requirements (pp. 33-34).
- HUD's application rating factors for new projects are described in extensive detail for all four project types listed above (pp. 34-39).
- The overall explanation of HUD's 200-point application scoring criteria is detailed in this NOFA as well (pp.49-69).

To assist in making Continuum of Care applications more competitive in those areas, IHDA can provide the following information to applicants upon request:

- Illinois PHA List with contact information for (Homeless admission preference, Public Housing, HCVs, VASH, accessing other mainstream resources; also on HUD's website.
- CDBG Entitlement grantees list (to encourage documenting coordination with HCD and ESG grantees and local Consolidated Plans), if appropriate to applicant C of C; also on HUD's website.
- CPD FFY 2019 Allocations Chart (CDBG/HOME/ESG/HOPWA/ HTF funding information); also on HUD's website.
- ACHP 2018 Annual Progress Report (Information on supportive housing, Statewide Referral Network, Ilhousingsearch.org, Persons with Disabilities, Veterans, State/IHDA fair housing activities, VASH funding, other). NOTE: The latter is available on IHDA's website at www.ihda.org, under the "Statewide Plans and Reports" link.

Hopefully including this information will provide applicants with additional guidance to improve their documentation and scoring in these areas. In addition, please note the following:

- Reviews of State agency program (vs. project) applications will be an abbreviated procedure, as the latter applications typically do not include project-specific information. Conversely, project-specific proposals which involve a State agency and/or a non-profit or otherwise eligible applicant require more review time.
- These procedures can be expedited in cases where IHDA has determined that extenuating circumstances existed which were beyond the control of the applicant. Even in these situations, no guarantees to meet pending HUD deadlines can be made by IHDA.
- The Notice of Funding Availability (NOFA) for the FFY 2019 Continuum of Care Program Competition was announced on July 3, 2019. The deadline for submitting applications to HUD for the FFY 2019 Continuum of Care Program Competition is Monday, September 30, 2019. Please note that up to \$2.3 Billion will be made available nationally through this NOFA.

In closing, please contact the SPAR staff at 312/836-5262 for additional information or assistance on these matters.

Local Consolidated Plan Communities for FFY 2019 Funding

Projects located in the following cities and counties require a local Consolidated Plan Certification of Consistency, which should be requested from the city or county in which the project is located, except as noted below (see NOTE). The State (OHCS/IHDA) does not provide Certifications of Consistency for projects located in the following cities and counties.

Cities:

- | | |
|---|---|
| (1) Arlington Heights (PE – Cook County Consortium) | (21) Oak Lawn |
| (2) Aurora | (22) Oak Park (PE - Cook County Consortium) |
| (3) Berwyn (PE – Cook County Consortium) | (23) Palatine (PE - Cook County Consortium) |
| (4) Bloomington | (24) Pekin |
| (5) Champaign (PE - Urbana Consortium) | (25) Peoria |
| (6) Chicago | (26) Rantoul |
| (7) Cicero (PE - Cook County Consortium) | (27) Rock Island |
| (8) Danville | (28) Rockford |
| (9) Decatur | (29) Schaumburg (PE - Cook County Consortium) |
| (10) DeKalb | (30) Skokie |
| (11) Des Plaines (PE - Cook County Consortium) | (31) Springfield |
| (12) Elgin (PE – Kane County Consortium) | (32) Urbana (LE) |
| (13) Evanston | (33) Waukegan (PE – Lake County Consortium) |
| (14) Hoffman Estates (PE – Cook County Consortium) | |
| (15) Joliet (PE – Will County Consortium) | Counties: |
| (16) Kankakee | (34) Cook County (LE) |
| (17) Moline | (35) DuPage County (LE) |
| (18) Mount Prospect (PE - Cook County Consortium) | (36) Kane County (LE) |
| (19) Naperville (PE - DuPage County Consortium) | (37) Lake County (LE) |
| (20) Normal | (38) Madison County (LE) |
| | (39) McHenry County |
| | (40) St. Clair County (LE) |
| | (41) Will County (LE) |

PE = Participating Entity in a HOME Consortium LE = Lead Entity of a HOME Consortium

NOTE: A Certification of Consistency for “participating entities” of a HOME Consortium should be obtained from the lead entity. The lead entity for each participating entity is noted beside each participating entity. For lead entity contact information, contact Burton Hughes at 312/836-5320 or Pearl Madlock at 312/836-5262.

**REVIEW OF APPLICATION/PROPOSAL FOR CERTIFICATION OF
CONSISTENCY WITH STATE CONSOLIDATED PLAN**

In order to provide a Certification of Consistency with the State Consolidated Plan to an applicant entity for a Consolidated Plan-covered program, the following review checklist serves to evaluate this proposal and recommend further action, per the following:

(1) Name of Program Applied For: _____

(2) Date of Receipt of Request/Proposal: _____

(3) HUD's Application Deadline Date: _____

(4) Applicant Entity (ies): _____

(5) Eligible Applicant under Program Guidelines?: Yes____ No_____

(6) State Agency Program application or Local/State Project application?: _____

(7) **Project Description:** _____

- If Housing, specify the type of housing:

MF____ # of Units____ Bedroom Distribution: _____ N/A_____

SF____ # of Units____ Bedroom Distribution: _____ N/A_____

New Construction: _____

Acquisition: _____

Rehabilitation: _____

- If Services, specify the type of services provided: _____

Number of Households Served: _____

Number of Households Estimated to be Served: _____

- If Rental Housing, specify the type of housing:

Transitional: _____ # of Units____ Bedroom Distribution _____

Permanent Housing: _____ # of Units____ Bedroom Distribution _____

Housing First (%) _____

• **If Renewal Funding for the Project** _____

Amount of Funding Requested _____

Use of Funds _____

(8) Do proposed activities appear to be eligible under this program?: Yes ____ No ____

(9) Project Location(s): _____

(10) Is there a local CDBG Entitlement city, county or HOME Consortium or Participating Jurisdiction in/at this(these) location(s)? If so, indicate which one(s): ____

(11) Relevant references to this program or type of project in the State's approved Consolidated Plan (indicate page numbers): _____

a. Does the State's Annual Action Plan indicate the State planned to apply for the program or was willing to support an application by another entity for that program?

_____ - *State application indicated*

_____ - *Support application by other entity*

b. Is the location of activities consistent with the geographic areas specified in the State's Annual Action Plan? Yes ____ No ____

Program Description: _____

Geographic Distribution: _____

c. Do the proposed activities benefit a category of residents for which the State's Five-Year Strategy shows a priority? Yes ____ No ____

Program Description: _____

(12) Categories of Residents to be Assisted:

a. _____ *Very Low / Low / Moderate Income*

b. _____ *Homeless and At-Risk Homeless Individuals / Families*

c. _____ *Low-Income Elderly*

d. _____ *Low-Income Persons with Disabilities*

e. _____ *Live near work*

f. _____ *Affordable Housing Preservation*

g. _____ *Other Special Needs Populations (persons with criminal records, and veterans/homelessness)*

h. _____ *Low-income persons living in community revitalization areas*

(13) Comments: _____

(14) Based on the review, this proposal is consistent ___ is not consistent ___
with the State's approved Consolidated Plan.

(15) Reviewed by _____ on _____
(Signature) (Date)

(Title)

(16) If approved, Certification of Consistency with Consolidated Plan was mailed on _____
(Date)
and/or FAXED on _____ to the following:
(Date)

_____ (Name)
_____ (Applicant)
_____ (Address)
_____ (City/State/Zip Code)
_____ (Telephone #)
_____ (FAX #)

Questions / Notes on Proposal

