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**MEMORANDUM**

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**TO:** Interested Parties

**FROM:** Bill Pluta, Director  
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 Program Process**

**DATE:** August 21, 2018

As you may know, applications for many HUD-funded competitive grant programs, (reference 24 CFR Part 91 Subpart F) especially those covered under various HUD's "NOFAs" (Notices of Funding Availability), must include a Certification of Consistency with the 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 continue to provide consistency in how such proposals which fall under IHDA's (SPAR) review are handled, this memo serves to establish standardized procedures for the processing 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; and/or
- A Consortium formed for the purpose of participating directly with HUD in the HOME program.

Local jurisdictions that only receive CDBG, HOME, or ESG funds through participation in a State-administered program 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 Low Income Housing Tax Credit projects proposed in CDBG Entitlement areas). See Attachment A for a statewide listing of communities that are required to submit local Consolidated Plans. All others fall under the State's Consolidated Plan.

To determine whether or not the particular program being applied for requires a Consolidated Plan certification of consistency, please refer to the program guidelines and Notice of Funding Availability (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 which 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 is 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 internal review form (see attached). 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 at this time 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

F. Please note that changes to HUD's homeless assistance funding (per the HEARTH Act) require only **ONE** Certification of Consistency with the State Consolidated Plan be submitted per Homeless Continuum of Care (CoC) agencies each 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. It is incumbent on the applicant to provide adequate time for such reviews prior to HUD application deadlines. Please also note that HUD's scoring process for the current NOFA indicates the following:

- The grant term for all projects is one year.
- Maximum points will be awarded to CoCs that demonstrate how the CoC consults with each Consolidated Plan jurisdiction, whether Point-In-Time (PIT) count data is provided for the development or update of the Consolidated Plan, and whether the CoC provided consultation to the local ESG recipient in determining the ESG funding allocation plan and performance plan, including how to evaluate and improve performance of ESG project activities.
- *Coordination with Federal, State, Local, Private, and Other Organizations.* CoCs need to identify and coordinate with other organizations that serve individuals, families, unaccompanied youth, and persons fleeing domestic violence who are experiencing or at risk of homelessness. To receive maximum points, CoCs must demonstrate: other federal, State, local, private, and other organizations are included in the planning and operation of projects; and (2) that they actively consulted with ESG recipients in the planning and allocation of ESG funds and participated in the Consolidated Plan jurisdictions' process(s) by providing PIT and HIC data and ensuring local homelessness information is communicated and addressed in the Consolidated Plan updates.
- *Matching Requirements* – Please note HUD's 25% matching requirements details: 24 CFR Part 578.73
- *The Housing First model is required to be used for at least 75% of all housing projects applications, and is part of the application scoring process. This covers all housing activities (permanent, transitional, and safe haven). The Continuum of Care NOFA has extensive and well- described application scoring criteria, with over 50 factors included. It is recommended that all applicants thoroughly review Pages 49 – 70 of this NOFA to obtain a clear understanding of how new and renewal projects will be reviewed and scored.*
- *HUD reviews Past Performance as part of its evaluation process (See pages 32-33 of NOFA).*

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)
- CDBG Entitlement grantees list with contact information (to encourage documenting coordination with HCD and ESG grantees) and local Consolidated Plans.
- CPD FFY 2018 Allocations chart (CDBG/HOME/ESG/HOPWA, INHTF funding information)
- ACHP 2017 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](http://www.ihda.org), on 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 2018 Continuum of Care Program Competition has been announced. The deadline for submitting applications to HUD for the FFY 2018 Continuum of Care Program Competition is Tuesday, September 18, 2018. Please note that up to \$2.1 Billion will be made available nationally for this NOFA.

III. 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 2018 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:  | (26)      | Naperville (PE - DuPage County Consortium)  |
| (1) Alton (PE- Madison County Consortium)          | (27)      | Normal                                      |
| (2) Arlington Heights                              | (28)      | North Chicago (PE - Lake County Consortium) |
| (3) Aurora (PE)                                    | (29)      | Oak Lawn                                    |
| (4) Belleville (PE - St. Clair County Consortium)  | (30)      | Oak Park (PE - Cook County Consortium)      |
| (5) Berwyn (PE - Cook County Consortium)           | (31)      | Palatine                                    |
| (6) Bloomington                                    | (32)      | Pekin                                       |
| (7) Bolingbrook (PE)                               | (33)      | Peoria                                      |
| (8) Champaign (PE - Urbana Consortium)             | (34)      | Rantoul                                     |
| (9) Chicago  | (35)      | Rock Island                                 |
| (10) Chicago Heights (PE - Cook County Consortium) | (36)      | Rockford                                    |
| (11) Cicero (PE - Cook County Consortium)          | (37)      | Schaumburg                                  |
| (12) Danville                                      | (38)      | Skokie                                      |
| (13) Decatur                                       | (39)      | Springfield                                 |
| (14) DeKalb  | (40)      | Urbana (LE)                                 |
| (15) Des Plaines                                   | (41)      | Waukegan (PE - Lake County Consortium)      |
| (16) Downers Grove (PE- DuPage County Consortium)  | (42)      | Wheaton (PE- DuPage County Consortium)      |
| (17) East St. Louis                                | Counties: |   |
| (18) Elgin (PE - Kane County)                      | (43)      | Cook County (LE)                            |
| (19) Evanston                                      | (44)      | Champaign County (PE - Urbana Consortium)   |
| (20) Granite City (PE- Madison County Consortium)  | (45)      | DuPage County (LE)                          |
| (21) Hoffman Estates                               | (46)      | Kane County (LE)                            |
| (22) Joliet  | (47)      | Lake County (LE)                            |
| (23) Kankakee                                      | (48)      | Madison County (LE)                         |
| (24) Moline  | (49)      | McHenry County                              |
| (25) Mount Prospect                                | (50)      | St. Clair County (LE)                       |
|  | (51)      | 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

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