

## 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, 2018, 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** - HUD identified the following areas for DCEO to update and clarify:

- 5 Year Strategic Plan Performance
- 2017 Annual Action Plan - IDIS Report 06
- 2017 Planning and Administration Funds
- Compliance with the Primary Objective (70% low-moderate income benefit)
- 2017 Planning and Administration Funds
- Performance Reports
- Additional CDBG Compliance and Performance Comments - Section 108
- Program Compliance - Activity Summary Report and CDBG Exception Report
- Disaster Recovery

## **CDBG 2 - FIVE YEAR STRATEGIC PLAN PERFORMANCE**

Narrative in CR-05 of the APR noted:

"...although PY 2017 began on January 1st, the State was not authorized to expend funds until the Action Plan was approved and Grant Agreement signed in December".

The amount of time the State actually had PY2017 funds available to allocate prior to the time of the 2017 APR was severely shortened. As of September 27, 2018 DCEO had notified all grantees selected in the competitive Public Infrastructure and Housing Rehabilitation applicants that have been recommended for funding. As environmentals were currently being processed, grant agreements had not been executed and thus grantees had not been entered into the IDIS system to show in the 2017 APR. Further, beneficiaries would only be counted upon grant completion. Some accomplishments recorded in 2017 were funded from years prior to 2015 but completed in 2017.

Due to short length of time, no Economic Development (non-competitive/as-received/as-qualified program) grant awards had been made. Three grant requests were currently under evaluation.

Selection of projects to be funded with the Disaster Response Program funds is based upon Gubernatorial Disaster Declaration. Since 2017 funds were received, only one Declaration had been made. DCEO reached out to the community to let them know of the available funds but no application had been made. DCEO completed the application/review/approval process and preliminary award funding was announced.

As of September 25, 2018, 25 2017-funded awards had completed preagreement requirements and been entered in the IDIS system. The remainder were completing environmental reviews, however, due to a staffing shortage at Illinois' SHPO, the reviews were taking longer than usual.

The State will make the 2019 PY application materials available in early spring, regardless of whether funding has been received. Applications will be due earlier in the year, most likely prior to grant agreement with HUD. It will be noted in the Action Plan, application packet and all other applicable

places that grant award and funding is dependent on funding received from HUD. However, this will allow us to move forward with the grant making process immediately after receipt of HUD award.

Additionally, there appears to be several timing issues between previous PERs and Action Plans that have impacted the functionality of IDIS. Some screens were not available for generation or input. The State's lead agency, the Illinois Housing Development Authority, has detailed the issue in their response and it is DCEO's understanding the problem will be resolved and the correct information provided

### **CDBG 3**

## **2017 Action Plan IDIS Report 06**

As some 2017 grant agreements were being executed, committed amounts had changed. Only the Disaster Response and Economic Development programs had no committed amounts. Fortunately, the State so far had not been impacted by disasters and the program had not been used. DCEO is aware that the Economic Development program grants have not been utilized to the extent they should be. DCEO had made several changes to the Illinois Joint Committee on Administrative Rules for the program that would make the ED program more attractive to businesses. The Rules are on the last posting and should be implemented within 60 days

### **Compliance with the Primary Objective**

All Public Infrastructure and Housing Rehabilitation activities selected for funding for Program Year 2017 will utilize the low-to-moderate income National Objective when entered into IDIS. Additionally, all Economic Development grants must confirm that 51% of the jobs created are LMI per the Department's Guidebook.

The only grants outside of the LMI objective are the Disaster Response grants, which may utilize Urgent Need as the objective. However, if the Disaster Response activity benefits 51% LMI or more, then we will utilize LMI as the objective. To date, no Disaster Response grants have been awarded.

### **2017 PLANNING AND ADMINISTRATION FUNDS**

2017 Program Year Project #9 for State Planning has been cancelled as the State is unable to utilize the funds in the manner anticipated.

Both Administration and Technical Assistance funds are drawn from the oldest award until those funds are fully drawn. The State started drawing from the 2017 award for Administration and Technical Assistance beginning in July of 2018.



## Performance Report

On July 23, 2018, the IDIS PR-59 Report contained seven flags for the State's CDBG activities. Four required explanation and a Remediation Plan. All have been entered, reviewed and approved by the Field Office

### **CDBG 4**

As of September 25, 2018, the IDIS PR-59 Report shows two flags requiring explanation by December for no draws in a year. Today, Activity #13313 submitted a draw. On 9/14, Activity #13476 submitted a draw though it is not showing in IDIS ten calendar days later. We have experienced this type of situation before, where the draw was made but the IDIS system does not reflect it for an extended period of time.

## **ADDITIONAL CDBG COMPLIANCE AND PERFORMANCE COMMENTS - SECTION 108**

In our recent response to the September 7th email "Questions About the 2018 Annual Action Plan" from Jerry Deese to Melinda Koenig, the Department stated the following in response to a question about the state's intentions on the Section 108 Program: "Since authorization for the Section 108, the State of Illinois has not received any fundable applications. Consequently, for 2018 the State will not be funding this activity, 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." The following statement has been added in AP-30 (Section 108 segment) as well as AP-40. The State does not plan to activate the Section 108 Program.

### PROGRAM COMPLIANCE

#### PR03 ACTIVITY SUMMARY REPORT

Additional information has been entered into IDIS for the activities identified

#### PR52 CDBG EXCEPTION REPORT

Additional information has been entered into IDIS for the activities identified

### DISASTER RECOVERY

Per instructions received via e-mail from HUD, the State will begin the QPR completion for all DRGR grants and closeout procedures for Hurricane Sandy Disaster grant by October 15, 2018.

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

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 Keys, 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 Keys** – 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**

- Regarding the Emergency Solution Grants, HUD indicated the State had \$367,644 available to draw from 2016 funds. ESG Program staff contacted each grantee agency to ensure fund expenditure within the time-frame allowed. In most cases funds had been expended but there was a delay in data input into the ESG reporting system. The remaining IL Admin funding (\$90,660.78) was reallocated to agencies which already had eligible ESG expenditures and would be able to enter their data no later than September 12, 2018, thus ensuring compliance with the ESG deadline
- To address three-year HOPWA compliance deadlines, the State of Illinois' Housing Opportunities for Persons with AIDS Program conducted substantial amendments (subsequently approved by HUD) shifting federal project year funding from ILH13F999, ILH14F999 and ILH15F999 to the Department's Project Year 2017/2018 Annual Action Plans. Funds are to be allocated to HIV Care Connect Lead Agents and the remainder allocated to a blend of Lead Agents and housing facilities. The funding structure ensured funds accumulated from prior years are now tracked under the new grant based accounting system and expended on needed housing services including Short Term Rent, Mortgage (STRMU), and Utility Assistance/Tenant Based Rental Assistance (TBRA), and housing facilities. The State HOPWA Program took additional actions addressing findings pursuant to HUD monitoring that included an updated policy for Rehab

activities of the Ryan White/HOPWA SOP. IDPH also developed a tracking mechanism for its Provide data system which could be reviewed within each Project Sponsors record. HOPWA operating instructions under allowable costs were also updated

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 Registrar 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 7, 2019, and ended Wednesday, June 5, 2019. The State held one three-way public hearing on Thursday, May 30, at 10:00 A.M. in Springfield, Chicago, and

Marion. Three public comment letters were received. The responses are included in the appendices to this document.

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

Not applicable. Three public comment letters were received during the public comments period. The responses are included in the appendices to this document. 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 May 29, 2019, 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 May 22, 2019 and May 30, 2019. 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			Department of Commerce and Economic Opportunity
HOPWA Administrator			Department of Public Health
HOME Administrator	ILLINOIS		IL Housing Development Authority
ESG Administrator			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.

FINAL STATE OF ILLINOIS 2019 ACTION PLAN - PENDING HUD APPROVAL

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**

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FINAL STATE OF ILLINOIS 2019 ACTION PLAN - PENDING HUD APPROVAL

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

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

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## **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 Services - Housing Services-Victims of Domestic Violence Regional organization
	<b>What section of the Plan was addressed by Consultation?</b>	Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth 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 Services - Housing Services-Persons with Disabilities Services-homeless
	<b>What section of the Plan was addressed by Consultation?</b>	Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy 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 Services-Elderly Persons 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 Regional organization 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 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 Services-Elderly Persons 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 Services-Children Services-Persons with Disabilities Services-Persons with HIV/AIDS Services-Health Health Agency Publicly Funded Institution/System of Care Other government - State
	<b>What section of the Plan was addressed by Consultation?</b>	Non-Homeless Special Needs HOPWA Strategy 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 Services-Education Services-Employment Other government - Local Regional organization

	<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 Other government - State 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 Other government - State 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).

<p>Assessment of Fair Housing-FH Impediments</p>	<p>State and Local Governments</p>	<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>. 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 EHOOC 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> 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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FINAL STATE OF ILLINOIS 2019 ACTION PLAN - PENDING HUD APPROVAL

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>

<p>AFH 3 - Actions to Overcome Impediments</p>	<p>State Government</p>	<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>
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Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
		<p>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.</p>
<p>AFH 4 - Actions to Overcome Impediments</p>	<p>State Government</p>	<p>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</p>

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 unites 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 Administrating 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?
AFFH (3)	DCEO (with IDHR)	<p>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</p>
AFFH (4)	Dept of Financial and Professional Regulations (with IDHR)	<p>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</p>

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
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?
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 purposes of housing discrimination, the Attorney General has jurisdiction over multi-story housing which is defined as "any building of four 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 pursue 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>

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Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
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

<p>Discharge Policy (2)</p>	<p>Various State Agencies</p>	<p>Under the ESG Program, the State received responses from 21 separate homeless services/shelter agencies which had submitted copies of such polices, or were developing coordinated discharge polices 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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<p>Discharge Policy (3)</p>	<p>Various State Agencies</p>	<p>IDOC has incorporated the use of <a href="http://www.ReentryIllinois.net">www.ReentryIllinois.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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<p>Broadband Advisory Committee</p>	<p>Department of Commerce and Economic Opportunity</p>	<p>Public Act 100-0833 (HB 5752 Enrolled) Broadband Advisory Council (BAC) was signed into law Monday, August 13, 2018 with an effective date of January 1, 2019. The new law creates the Broadband Advisory Council Act and Broadband Advisory Council (BAC) under DCEO to expand broadband availability &amp; access throughout Illinois to all citizens, including unserved urban and rural areas; to conduct research, and recommend steps to eliminate barriers to broadband access among Illinois residents and businesses. These steps 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 both children and adults -Civic Engagement -Economic Development and Global Economy Access -Health Care -Aging in Place -Farming Communities -Tracking the FCC's streaming data rates, and communicating this info to the public. The Council/DCEO will serve as the broadband advocate to other State Agencies, communicating the broadband needs of Illinois citizens that do not have adequate (or any) access to broadband services. The Council will also report to the General Assembly annually concerning actions taken during the previous year. Provides that the Director of Commerce and Economic Opportunity (DCEO) serves as the Broadband Advisory Council's Chair, and that DCEO provide administrative, personnel, and technical support for the BAC. Provides for 21 voting members/designees (quorum of 7), including: Director of DCEO (Chair); Secretary of DOIT; Director of Aging; Illinois Attorney General; Chair, Illinois Commerce Commission; Disabled Citizens rep (Healthcare and Family Services); Electric Cooperative rep; statewide-Municipalities rep; statewide-Libraries rep; Public Housing Authority rep; Community College Board rep; Bd. of Higher Education rep; stateside-Farm Organization rep; statewide-Seniors Organization rep; 7 Members representing various types of broadband Providers, Working Groups appointed by the Broadband Advisory Council may include non-BAC members. All voting and non-voting members of the Council will be appointed within 90 days after the</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?
		effective date of the Act. (March 31, 2019). the law requires the Council to conduct its first meeting within 30 days after all members are appointed. and to meet quarterly, and provides that voting members of the Council shall select a Vice Chair from among the group. Additional hearings and public meetings are permitted at the discretion of the Council.

**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 7, 2019 and ended Wednesday, June 5, 2019. The State held one public hearing, via 3-way video-conference on Thursday, May 30, 2018 at 10:00 A.M. in Springfield, Chicago, and Marion, Illinois.

- A 2019 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-2019 Action Plan - were sent to the OHCS Advisory 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-2019 Action Plan were sent to interested parties as requested
- The public hearing was held Thursday May 30, during the 30-day public comments period. The May 30 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.
- Three public comment letters were received during the public comments period.

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- 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**

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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)
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1	Public Meeting	Non-targeted/broad community	<p>The public hearing was held Thursday, May 30, 2019 via 3 way video conference, in Springfield, Chicago and Marion. 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</p>	<p>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.</p>	<p>Not Applicable. During the public hearing, comments by a member of the public were addressed, and followed up via further written response</p>	
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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)
			provide testimony and comments.			
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	Three public comment letters were 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	Three public comment letters were received	Not applicable	<a href="http://www.ihda.org">http://www.ihda.org</a>

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)
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: \$		

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CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements 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
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FINAL STATE OF ILLINOIS 2019 ACTION PLAN - PENDING HUD APPROVAL

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 Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership 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.



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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: \$		
HOPWA	public - federal	Permanent housing in facilities Permanent housing placement Short term or transitional housing facilities STRMU Supportive services 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 permanent housing placements In addition funding will provide operating costs, repair/rehab and supportive services to persons residing in housing facilities around the State.

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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: \$		
ESG	public - federal	Conversion and rehab for transitional housing Financial Assistance Overnight shelter Rapid re-housing (rental assistance) Rental Assistance Services 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

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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: \$		
HTF	public - federal	Acquisition Admin and Planning Homebuyer assistance Multifamily rental new construction Multifamily rental rehab 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 Public Improvements	500,000	0	0	500,000	0	\$500,000 from repayment of IKE 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 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: 190 Households Assisted Homelessness Prevention: 375 Persons Assisted 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 Businesses assisted: 4 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 Household Housing Unit Rental units rehabilitated: 10 Household Housing Unit

Table 6 – Goals Summary

**Goal Descriptions**

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

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<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>	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 he 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, 2020.
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:                      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





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CDBG	0	24	0	0	0	0	0	0	54	14	8	0	0	0	<b>100</b>
HOME	100	0	0	0	0	0	0	0	0	0	0	0	0	0	<b>100</b>
HOP WA	0	0	0	0	0	0	100	0	0	0	0	0	0	0	<b>100</b>
ESG	0	0	51	0	45	4	0	0	0	0	0	0	0	0	<b>100</b>
HTF	100	0	0	0	0	0	0	0	0	0	0	0	0	0	<b>100</b>
Other CDBG- DR	0	0	0	0	0	0	0	0	100	0	0	0	0	0	<b>100</b>

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 additional, 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.

<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>

<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><b><u>Program Category</u></b></p> <p><i>Ongoing (non-competitive Programs)</i></p> <p>Economic Development (ED)</p> <p>Disaster Response (DR)</p> <p><i>Competitive Programs</i></p> <p>Public Infrastructure (PI)</p> <p>Housing Rehabilitation (HR)</p> <p><i>Pilot Project</i></p> <p>–</p> <p>Help Eliminate Lead Program (HELP)</p>	<p><b><u>Budget</u></b></p> <p>\$ 4,000,000</p> <p>\$ 2,000,000</p> <p>\$15,000,000</p> <p>\$ 6,500,000</p> <p>\$ Ongoing; no new funding</p>	<p><b><u>Ceiling</u></b></p> <p>\$1,000,000</p> <p>\$ 500,000</p> <p>\$ 500,000</p> <p>\$ 500,000</p>	<p><b><u>Deadline</u></b></p> <p>NA</p> <p>NA</p> <p>8/29/2019</p> <p>8/29/2019</p> <p>NA</p>

	<p><b>Describe threshold factors and grant size limits.</b></p>	<p>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.</p>
	<p><b>What are the outcome measures expected as a result of the method of distribution?</b></p>	<p>Unknown at this time.</p>
<p><b>2</b></p>	<p><b>State Program Name:</b></p>	<p>CDBG Economic Development Grant Program</p>
	<p><b>Funding Sources:</b></p>	<p>CDBG</p>

<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>

<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>



FINAL STATE OF ILLINOIS 2019 ACTION PLAN - PENDING HUD APPROVAL

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

<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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	<p><b>What are the outcome measures expected as a result of the method of distribution?</b></p>	<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 ration of \$1 to \$35,000; equaling 114.</p>
<p><b>3</b></p>	<p><b>State Program Name:</b></p>	<p>CDBG Housing Rehabilitation Grant Program</p>
	<p><b>Funding Sources:</b></p>	<p>CDBG</p>
	<p><b>Describe the state program addressed by the Method of Distribution.</b></p>	<p>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</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 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>                      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>                      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>                      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>                      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>

<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><b><u>Program Category</u></b>                      <b><u>Budget</u></b>                      <b><u>Ceiling</u></b>                      <b><u>Deadline</u></b></p>
	<p><i><u>Ongoing (non-competitive Programs)</u></i></p>
	<p>Economic Development (ED)                      \$ 4,000,000                      \$1,000,000                      NA</p>
	<p>Disaster Response (DR)                      \$ 2,000,000                      \$ 500,000                      NA</p>
	<p><i><u>Competitive Programs</u></i></p>
	<p>Public Infrastructure (PI)                      \$15,000,000                      \$ 500,000                      8/29/2019</p> <p>Housing Rehabilitation (HR)                      \$ 6,500,000                      \$ 500,000                      8/29/2019</p>
<p><i><u>Pilot Project</u></i></p>	
<p>Help Eliminate Lead Program (HELP)                      \$ Ongoing; no new funding                      NA</p>	
<p><b>Describe threshold factors and grant size limits.</b></p>	<p>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.</p>

	<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

<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>



<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>	<table border="1"> <thead> <tr> <th><u>Program Category</u></th> <th><u>Budget</u></th> <th><u>Ceiling</u></th> <th><u>Deadline</u></th> </tr> </thead> <tbody> <tr> <td colspan="4"><u>Ongoing (non-competitive Programs)</u></td> </tr> <tr> <td>Economic Development (ED)</td> <td>\$ 4,000,000</td> <td>\$1,000,000</td> <td>NA</td> </tr> <tr> <td>Disaster Response (DR)</td> <td>\$ 2,000,000</td> <td>\$ 500,000</td> <td>NA</td> </tr> <tr> <td colspan="4"><u>Competitive Programs</u></td> </tr> <tr> <td>Public Infrastructure (PI)</td> <td>\$15,000,000</td> <td>\$ 500,000</td> <td>8/29/2019</td> </tr> <tr> <td>Housing Rehabilitation (HR)</td> <td>\$ 6,500,000</td> <td>\$ 500,000</td> <td>8/29/2019</td> </tr> <tr> <td colspan="4"><u>Pilot Project</u></td> </tr> <tr> <td>Help Eliminate Lead Program (HELP)</td> <td>\$ Ongoing; no new funding</td> <td></td> <td>NA</td> </tr> </tbody> </table>	<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><u>Eligibility Thresholds:</u></p> <ol style="list-style-type: none"> <li><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><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><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>																																				

	<p><b>What are the outcome measures expected as a result of the method of distribution?</b></p>	<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 28; and then multiplying by the average number of persons served by each Public Infrastructure grant (500); equaling 14,000.</p>
5	<p><b>State Program Name:</b></p>	<p>CDBG Section 8 Loan Guarantee Program</p>
	<p><b>Funding Sources:</b></p>	<p>CDBG</p>
	<p><b>Describe the state program addressed by the Method of Distribution.</b></p>	<p>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.</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>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>

<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>

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

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

<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>

<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>

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

	<b>What are the outcome measures expected as a result of the method of distribution?</b>	N/A
7	<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

<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>	

<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>	

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

	<p><b>What are the outcome measures expected as a result of the method of distribution?</b></p>	<p>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</p>
8	<p><b>State Program Name:</b></p>	<p>Help Eliminate Lead Program (HELP) Pilot Program</p>
	<p><b>Funding Sources:</b></p>	<p>CDBG</p>
	<p><b>Describe the state program addressed by the Method of Distribution.</b></p>	<p>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.</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>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>

<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>

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

	<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)

<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>

<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>	

<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>

	<p><b>What are the outcome measures expected as a result of the method of distribution?</b></p>	<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	<p><b>State Program Name:</b></p>	<p>HOPWA Facility Based Rental Assistance</p>
	<p><b>Funding Sources:</b></p>	<p>HOPWA</p>
	<p><b>Describe the state program addressed by the Method of Distribution.</b></p>	<p>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.</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 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.</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><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>

<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>

	<p><b>What are the outcome measures expected as a result of the method of distribution?</b></p>	<p>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.</p>
<p><b>11</b></p>	<p><b>State Program Name:</b></p>	<p>HOPWA Facility-Based Housing Operations Assistance Program</p>
	<p><b>Funding Sources:</b></p>	<p>HOPWA</p>

<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>

<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>	

<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. 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>
<p><b>Describe how resources will be allocated among funding categories.</b></p>	<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>

	<p><b>Describe threshold factors and grant size limits.</b></p>	<p>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.</p>
	<p><b>What are the outcome measures expected as a result of the method of distribution?</b></p>	<p>Decent safe and affordable housing</p>
<p>12</p>	<p><b>State Program Name:</b></p>	<p>HOPWA Facility-Based Housing Rehabilitation and Repair</p>
	<p><b>Funding Sources:</b></p>	<p>HOPWA</p>
	<p><b>Describe the state program addressed by the Method of Distribution.</b></p>	<p>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</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 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>	

<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>

<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>

	<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.

<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>
<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>	
<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>

<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>

	<p><b>What are the outcome measures expected as a result of the method of distribution?</b></p>	<p>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.</p>
<p>14</p>	<p><b>State Program Name:</b></p>	<p>HOPWA Tenant Based Rental Assistance</p>
	<p><b>Funding Sources:</b></p>	<p>HOPWA</p>
	<p><b>Describe the state program addressed by the Method of Distribution.</b></p>	<p>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.</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>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 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>	

<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>

<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 Tenent based housing assistance. Project Sponsors will receive funding to service persons living HIV/AIDS who are in need of housing and supportive services.</p>

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

<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><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><b>Describe how resources will be allocated among funding categories.</b></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. The 2019 Illinois NHTF allocation is \$8,575,518. There is also allowance to use up to 10% of all funds (\$857,551 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>



<p><b>Describe threshold factors and grant size limits.</b></p>	<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 "Grand Total Hard Costs" on the IHDA website for a complete 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>
<p><b>What are the outcome measures expected as a result of the method of distribution?</b></p>	<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> <p>The State of Illinois will use the following HUD-determined Objective and Outcome statements for its CPD-HTF 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>
<p>16</p>	<p><b>State Program Name:</b> Revolving Loan Fund Activities</p> <p><b>Funding Sources:</b> CDBG</p>

<p><b>Describe the state program addressed by the Method of Distribution.</b></p>	<p>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.</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>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>

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

**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**

**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?**

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

**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**

Target Area	Percentage of Funds
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

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

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

<b>One Year Goals for the Number of Households Supported Through</b>	
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

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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 Continua 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 Continua 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	190
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
<b>Total</b>	<b>638</b>

## **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, IDHS-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 component 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:

- (1) Make acceptable assurances to the grantee that it will comply with the requirements of the HTF program during the entire period that begins upon selection of the recipient to receive HTF funds, and ending upon the conclusion of all HTF-funded activities;
- (2) Demonstrate the ability and financial capacity to undertake, comply, and manage the eligible activity;
- (3) Demonstrate its familiarity with the requirements of other Federal, State, or local housing programs that may be used in conjunction with HTF funds to ensure compliance with all applicable requirements and regulations of such programs; and
- (4) Have demonstrated experience and capacity to conduct an eligible HTF activity as evidenced by its ability to:
  - (i) Own, construct, or rehabilitate, and manage and operate an affordable multifamily rental housing development; or
  - (ii) Design, construct, or rehabilitate, and market affordable housing for homeownership.
  - (iii) Provide forms of assistance, such as down payments, closing costs, or interest rate buy downs for purchasers.

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 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 below, 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.

#### 1. Mandataory Application Criteria

IHDA will use its Multifamily Financing "Common Application" as the major application format for national HTF rental housing projects (See above).

#### 2. Eligible Activities

Eligible Activities under the Illinois National HTF Program will include the following:

- Rental housing development (new construction or acquisition/rehabilitation) Eligible project costs included the following: Real property acquisition; development hard costs; relocation; demolition; utility connections; site improvements; soft costs, including architectural, engineering costs, developer fees, and AFHMP marketing; paying construction loans; and staff project delivery costs.
- Operating/rental assistance is also an eligible activity, but is limited to a maximum of 33% of any year's State allocation, and must be fully utilized within 5 years of award. Such assistance can also be subsequently renewed, as long as it's within the 30-year affordability period. It is anticipated such assistance would be very limited and in the form of grants. Applicants must also present a long-term plan of utilizing permanent sources of State and federal rental assistance to be given consideration in this area.
- Public housing is only eligible under the national HTF if the proposed project is part of HUD's Rental Assistance Demonstration (RAD) program, Choice Neighborhood Initiative Program, or involves the LIHTC Program. Priority will be given to projects creating new units.
- IHDA is not funding homeownership assistance under the program
- Eligible use of funds include: loans (low-interest, no-interest, balloon, forgivable, deferred payment), grants, interest rate subsidies, equity investments, and other State-approved forms of assistance

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 PSH RFA Section 3, 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 PSH RFA Section 4, 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 Permanent Supportive Housing RFA Section 3, 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 RFA Section 5, 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 Permanent Supportive Housing RFA Section 3, 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 be scored during the final evaluation phase.

Projects will also be scored on the following items that meet the housing needs of the State. See Permanent Supportive Housing 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 2018-2019 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.

The total cost per unit takes into considerations 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.

# of Bedrooms	City of Chicago and Chicago Metro	Other Metro, Non-Metro
0	\$160,000.00	\$110,000.00
1	\$210,000.00	\$160,000.00
2	\$280,000.00	\$210,000.00
3	\$315,000.00	\$225,000.00
4+	\$325,000.00	\$230,000.00

**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 Architectural Planning and Construction Standards, 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 Rquirements
- Accessibility Stand which must be met
- Disaster mitigation requirements
- State and Local Codes, Ordiance, 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 UPCS checklist (Uniform Physical Condition Standards for Multifamily Housing Rehabilitation ( at <https://www.ihda.org/developers/dev-resource-center/>) to ensure they meet with minimum requirements. The checklist will be used in conjunction with the previously completed Property Needs Assessment (see PNA below) 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:**

For forms and documents relevant to HOME and the national Housing Trust Fund, refer to the IHDA website's "Developer Resource Center" at:

<https://www.ihda.org/developers/dev-resource-center/>

**Program Specific Requirements - HOPWA**

**HOPWA**

The co-administration of HOPWA and Ryan White funding by the Illinois Department of Public Health allows for better coordination in program planning, new program development, and fund allocation to various activities. The Department has worked with its Part B advisory group to ensure that funding aligns to meet the needs of persons living with AIDS. The Part B Advisory group is constantly responding to meet rising needs. Though the primary focus of Part B funds addresses healthcare needs and related support services, these funds have also been used to address and supplement the housing needs of persons living with HIV/AIDS in the State of Illinois. Needs assessment activities are followed by priority setting and resource allocation. IDPH hosts mini-forums across the state for people living with HIV/AIDS and provider agencies to identify and address issues related to clients' needs. Topics include barriers to housing, homelessness, and emerging trends that impact people living with HIV/AIDS.

The Department requires the HIV Care Connect Lead Agents to develop annual work plans prior to receiving funds. The work plans must identify specific service and estimated number of person's that will be served by service category. The work plan will include descriptions of populations to be served, the care and service needs of the population and ways in which the HIV Care Connect Regions will ensure that the most in need will receive housing assistance. The State ultimately has the responsibility to ensure that grantees and project sponsors are caring out their programs in accordance with all applicable laws and relations.

The Department of Public Health works closely with each HIV Care Connect program and fiscal staff on a daily basis to ensure all obligations of the HOPWA program is met. IDPH monitors all programmatic and administrative expenditures through Provide which is a data management system. Activities and expenditures are entered in this data management system before reimbursements for services are approved.

The Department will consider faith-based or non-profit organization. Every three years the Department opens grant opportunities for grassroots faith-based and other community organizations. All grantees must submit 501C nonprofit status and prove that agencies are in good standing with the State of Illinois. All grantees must describe a statement of its capacity and performance history in providing services for people living with HIV/AIDS.

## **Attachments**

## Citizen Participation Comments

**STATE OF ILLINOIS PUBLIC NOTICE**  
**Public Hearing**  
**on the Draft 2019 Consolidated Plan-Action Plan**

To obtain public input from Illinois residents and to comply with the United States Department of Housing and Urban Development (HUD) rules, which require the State to develop a Consolidated Plan, the Illinois Housing Development Authority (IHDA), in coordination with the Illinois Department of Commerce and Economic Opportunity (DCEO), the Illinois Department of Human Services (IDHS), and the Illinois Department of Public Health (IDPH), announces the availability of the draft 2019 Action Plan. This draft document will be available to the public electronically by Tuesday, May 7, 2019, and will also be available on request in limited hard copies by mail.

This draft plan covers those areas of the state that are not otherwise under the jurisdiction of a local Consolidated Plan. It includes summaries of the projected funding for the following HUD formula grant programs: the Community Development Block Grant (CDBG); HOME Investment Partnerships; Emergency Solutions Grant (ESG); Housing Opportunities for Persons with AIDS (HOPWA); and the (National) Housing Trust Fund. An electronic version will be available on IHDA's website, [www.ihda.org](http://www.ihda.org). Electronic copies will also be available through the State Library network, as well as other local libraries located throughout the state.

The State will be holding a three-way public hearing on Thursday, May 30, 2019, at 10:00 A.M. It will be held in Springfield at the Illinois Department of Commerce and Economic Opportunity (DCEO), 500 East Monroe, 4<sup>th</sup> Floor; 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.

Persons are welcome to provide written comments prior to, at, or after the public hearing. Written comments are also welcomed for presentation at the public hearing, or mailed directly to IHDA, to ensure any comments receive a written response. All sites are fully accessible to persons with physical disabilities. Hearing-impaired and sight-impaired individuals in need of services such as an interpreter, or documents in large-print/Braille, are asked to make requests directly to IHDA at the telephone numbers below at least three (3) days before the public hearing. IHDA will make reasonable efforts to accommodate such requests. To obtain additional information concerning the public hearing, please call (312) 836-5262 or TDD/TTY (312) 836-5222. The State's public comments period begins on Tuesday, May 7, 2019, and ends on Wednesday, June 5, 2019.

All written public comments must be received at IHDA by close of business on the latter date. For further information, contact:

Illinois Housing Development Authority  
Strategic Planning and Research Department  
Office of Housing Coordination Services (OHCS)  
Attention: Consolidated Plan  
111 E. Wacker Drive, Suite 1000  
Chicago, Illinois 60601  
312/836-5364

**Dated: May 1, 2019**

**Public Hearing  
For the State of Illinois  
State Consolidated Plan-Draft 2019 Action Plan**

Thursday, May 30, 2019 @ 10:00 A.M.  
via 3-Way Tele-Video Conference

Illinois Department of Commerce and Economic Opportunity  
4<sup>th</sup> Floor Conference Room  
500 East Monroe  
Springfield, Illinois

James R. Thompson Center  
Illinois Conference Room,  
100 West Randolph Street  
Chicago, Illinois

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

**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



**MINUTES**  
**State Consolidated Plan**  
**Public Hearing on the**  
**Draft 2019 Consolidated Plan-Annual Action Plan**

**Via 3-way Video-Conference @ 10:00 a.m**  
in  
**Springfield, Chicago, and Marion, Illinois**

Department of Commerce and Economic Opportunity, 500 East Monroe, 4<sup>th</sup> Floor - **Springfield, Illinois**  
James R. Thompson Center in the Illinois Conference Room, 100 West Randolph - **Chicago, Illinois**  
State of Illinois Building, 2309 West Main Street - **Marion, Illinois**

**Thursday, May 30, 2019**

**Attendees:**

	-Springfield-
Wendy Bell	Illinois Department of Commerce and Economic Opportunity
Kim Doyle	Illinois Department of Human Services
Deborah Grant	Illinois Department of Public Health
Burton Hughes	Illinois Housing Development Authority
Tamara Koniak	Illinois Department of Human Services
Bill Pluta	Illinois Housing Development Authority
Josalyn Smith	Illinois Department of Human Services
Ticorral Tolliver	Illinois Department of Human Services
	-Chicago-
Adam Ballard	Access Living
Ben Fenton	Illinois Housing Development Authority
Citizen Attendee	
	-Marion-
Cietta Gower	Illinois Department of Commerce and Economic Opportunity

Mr. Bill Pluta began the meeting, welcoming attendees and giving a brief history of the State's role in developing both the HUD-required Consolidated Plan and the State-required Annual Comprehensive Housing Plan (ACHP). He stated that all Consolidated Plan and ACHP documents are available for review and download on the IHDA website. He also gave a brief description of the Citizen Participation Plan, and the State's housing priorities addressed in both of the plans.

Mr. Burton Hughes then provided attendees a briefing on the public consultation component and approval process of the State of Illinois 2019 Action Plan. Today's three-way videoconference hearing in Springfield, Chicago and Marion provides the public with the opportunity to provide commentary on the affordable housing goals outlined under the proposed State of Illinois 2019 Annual Action Plan. The Consolidated Plan annual public participation component, which prior to 2014 began in October, has delayed annually since 2014, when HUD informed Community Planning and Development Formula Grant grantees that they can no longer submit annual Action Plans until after HUD has published the formula grant allocations for each program. These actual amounts needed to be included in the draft 2019 Action Plan. Not until February 13, 2019, following the partial federal government shutdown, did HUD issue the formal notice delaying submission of the Consolidated Plan until actual 2019 allocations became available. The President signed the final 2019 Appropriations Act on February 15, allowing HUD sixty-days to inform formula grantees of their 2019 allocation amounts. HUD announced formula grant allocations for the CDBG, HOME, ESG and HOPWA programs on April 12, 2019, giving the State 60 days to conduct the Citizen Participation public comments component for the 2019 Action Plan. HUD announced the national Housing Trust Fund allocations for states on Monday, April 15, 2019.

# FINAL STATE OF ILLINOIS 2019 ACTION PLAN - PENDING HUD APPROVAL

State of Illinois Federal Fiscal Year 2019 Formula Grant Allocations are as follow:

- **CDBG** \$29,192,836
- **HOME** \$15,391,165
- **ESG** \$4,935,064
- **HOPWA** \$1,734,635
- **HTF** \$8,575,518

The 30-day Public Comments period for the State of Illinois 2019 Action Plan began Tuesday, May 7, 2019 and will end Wednesday, June 5, 2019. The OHCS Advisory Committee Meeting occurred yesterday Wednesday, May 29, 2019, in Springfield. The State will have six days to respond to public comments after the close of the Public Comments period. The State will submit the final 2019 Action Plan to HUD on June 11, 2019.

Mr. Hughes and Mr. Pluta then reviewed for attendees all relevant sections and information from the 2019 Action Plan, including the Executive Summary, Citizen Participation, Public Consultation, Expected Resources, Annual Goals, Allocation Priorities, Method of Distribution, Public Housing, Homeless/Other Special Needs, Affirmatively Furthering Fair Housing update, Barriers, and Other Actions sections of the document. One major item of interest was the new Broadband Advisory Council, led by DCEO. The Broadband Advisory Council created by Public Act 100-0833, is a new planning effort to expand broadband access across the State to all residents of Illinois. IHDA also discussed its activities with Public Housing Authorities, as well as troubled PHAs.

Individual program reports were as follows

Ms. Wendy Bell of the Department of Commerce and Economic Opportunity (DCEO) reviewed the various components and projected funding levels for the 2019 Community Development Block Grant (CDBG) Program. The State's total CDBG allocation for 2019 is \$29,192,836. For 2019, CDBG Public Infrastructure is funded at \$15,000,000. Funding is estimated to benefit 14,000 individuals. Housing Rehabilitation is funded at \$6,500,000, with the goal of providing single-family owner occupied housing rehabilitation assistance to 130 low-income households. Economic Development is funded at \$4,000,000, estimated to assist 4 businesses, and create and/or retain 114 jobs across the State of Illinois. Applications for Public Infrastructure and Housing Rehabilitation are due by August 29, 2019. Both 2019 Economic, and Disaster Recovery grants have no specific due dates. Since authorization for the Section 108 Program under CDBG, the State of Illinois has not received any fundable applications. Consequently, as of 2018, the State has 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.

In additional information, the new Disaster Response Program for 2019 will provide interim assistance (clean-up) for areas designated by the Governor as State Disaster Areas. Individual grants are capped at \$500,000 per grant. The CDBG set-aside is \$2 million. In case of emergency, DCEO reserves the right to change CDBG allocations to address specific needs in the communities affected. The Help Eliminate Lead Program (HELP) is underway in Galesburg. DCEO is working with the University of Illinois-Chicago on a study of this pilot program.

Ms. Josalyn Smith of the Illinois Department of Human Services (IDHS) reported on the 2019 Emergency Solutions Grants Program, funded at \$4.9 Million. The ESG Program has a 24-Month grant deadline after the date HUD signs the grant agreement to expend program funds. Under the State's Priorities, ESG serves low-income households, homeless and at-risk homeless. ESG program funding is disbursed geographically to 18 local Illinois Continuums of Care that coordinate 80 agencies contracted with IDHS to provide the ESG program services to the homeless. Apart from Program Administration (7.5%) and HMIS at \$177,352, the State expects to commit ESG funds for the following activities.

2019 Activity	Estimated Funding
Street Outreach	\$72,438
Emergency Shelter	\$2,475,024.83
Rapid Re-Housing	\$1,849,148.81

## FINAL STATE OF ILLINOIS 2019 ACTION PLAN - PENDING HUD APPROVAL

Mr. Hughes reviewed goals for both the HOME Program and Housing Trust Fund for 2019. The 2019 HOME allocation is \$15,391,165. For the 2019 HOME program, the Illinois Housing Development Authority has projected an estimate for the construction of HOME rental units consisting of the construction of 28 new units through HOME Multi-family funding, dependent upon. IHDA estimates the rehabilitation of 18 existing units through HOME Multi-family for 2019, resulting in 46 HOME units for 2019, dependent upon application. No Single-family programs are funded by HOME under the 2015-2019 Five Year Consolidated Plan. IHDA currently funds these types of programs through the Illinois Affordable Housing Trust Fund.

The State's national Housing Trust Fund (HTF) allocation for 2019 is \$8,575,518. For the national HTF, IHDA estimates the construction of 16 new units through the national HTF program, and the rehabilitation of 10 existing units through the national HTF program, for an estimated 26 units of multi-family affordable housing for households at or below 30% of Area Median Income. Mr. Hughes also noted that previous year, 2019 HTF Funds will be distributed in tandem with IHDA's Round VI PSH Development Program award, once that process is completed. Information on the PSH RFA and application deadline for funding under the Housing Trust Fund are still pending.

Ms. Deborah Grant of the Illinois Department of Public Health spoke on the HOPWA Program for 2019 (allocated at \$1,734,635). Funds will provide short-term mortgage/utility tenant-based assistance, and facility-based rental assistance. Funding will also provide operating costs, repair/rehab and supportive services to persons residing in housing facilities around the State. Estimated households assisted include 190 households for tenant based rapid rehousing and 375 persons assisted with homeless prevention.

The Meeting then opened for comments from the public.

Mr. Adam Ballard from Access Living spoke to the need for additional affordable housing for persons with disabilities in communities of their choice. It was noted that developing innovative models that provide rental assistance to more units than are currently served under existing programs can be a challenging but successful endeavor. One example would be devising a way to use HOME Investment Partnership resources and/or National Housing Trust Fund dollars to serve additional households. Another possible way to increase affordable accessible housing could be through IHDA's Home Modification Program that would be available directly to landlords or tenants, along the line of the Home Accessibility Program (HAP).

The Citizen Attendee provided written comments addressing some of the challenges that Persons with HIV/AIDS face in accessing decent, safe, affordable housing. As a resident of Chicago, he shared his personal experience with seeking reasonable accommodation from his landlord for health-related and safety issues. Though he does not receive assistance from either the State or City Chicago HIV/AIDS program, he is the resident of a subsidized apartment. Ms. Grant responded to his comments, saying she would contact City of Chicago HIV/AIDS staff directly on his behalf, and for additional follow-up. Additionally, the Illinois Housing Development Authority, which provided financing for the development in which he lives, will be working with the management team to resolve any issues.

**From:** Frank Bowman [REDACTED]  
**Sent:** Tuesday, May 7, 2019 3:02 PM  
**To:** Burton Hughes <[BHughes@ihda.org](mailto:BHughes@ihda.org)>  
**Subject:** RE: Availability of the Draft 2019 Consolidated Plan - Annual Action Plan

Hi Burton,

I spent a little time today reviewing the Plan and trying to learn more about how manufactured housing factors into the mix. I followed a couple of the programs to their federal origins and found the following definition for housing:

HOME INVESTMENT PARTNERSHIPS PROGRAM

**Housing:** Source: [24 CFR § 92.2](#)

Housing includes manufactured housing and manufactured housing lots, permanent housing for disabled homeless persons, transitional housing, single-room occupancy housing, and group homes. Housing also includes elder cottage housing opportunity (ECHO) units that are small, free-standing, barrier-free, energy-efficient, removable, and designed to be installed adjacent to existing single-family dwellings. Housing does not include emergency shelters (including shelters for disaster victims) or facilities such as nursing homes, convalescent homes, hospitals, residential treatment facilities, correctional facilities, halfway houses, housing for students, or dormitories (including farmworker dormitories).

To date, every time I've reached out to IHDA and asked how/if manufactured housing qualifies for certain programs I've been told no.

Can you please have someone who is familiar with manufactured housing and the programs which MH would qualify for, especially in land lease communities, contact me.

Also, I read the following section in the Plan with genuine interest:

**Page 150**

**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**

I have been working with Senate President Cullerton to propose workable solutions to the housing affordability problem. Items 1-6 above are solutions I am very familiar with and would be willing to help should the need arise.

Respectfully,

Frank Bowman, Executive Director  
Illinois Manufactured Housing Association  
P.O. Box 2008  
Springfield, IL 62705  
217-528-3423  
[www.imha.org](http://www.imha.org)

**Quality, Affordable, Factory-Built Housing**







111 E. Wacker Drive  
16th Fl. 1000  
Chicago, IL 60601  
312.826.5200

Frank Bowman, Executive Director  
Illinois Manufactured Housing Association  
P.O. Box 2008  
Springfield, IL 62705

June 11, 2019

Dear Mr. Frank Bowman,

Thank you for your recent e-mail on the eligibility of manufactured housing under IHDA's affordable housing development programs, which was sent to IHDA as a public comments letter on the draft Consolidated Plan-2019 Annual Action Plan. I'm not sure which IHDA staff informed you that manufactured housing was not eligible under certain programs, so apologize for any misunderstanding that may have occurred as a result of this. I did check with IHDA's Staff Architect and Assistant Manager of its Multifamily Financing Department to clarify IHDA's policy on manufactured housing, and was informed of the following. First of all, under IHDA's Architectural and Construction Standards, Section 19 covers "Factory-Built Homes", and outlines these requirements, which also states that these standards apply to both manufactured and modular housing. These standards apply to all housing types presented to IHDA under these delivery methods. Please note that these standards include HUD/FHA requirements and State statutes, both which require such housing to be built on a permanent foundation. As a further example, IHDA recently reviewed a modular housing project in the City of North Chicago, which closed the last few months utilizing these same standards. Please also note that these and all multi-family projects proposed for IHDA assistance are also subject to local zoning ordinances and building codes, which are part of IHDA's review process.

In closing, I hope this clarifies IHDA's policy on manufactured housing. Please feel free to contact me or our multifamily Financing Department if you have any additional questions or would like additional information. Thank you for your interest in IHDA's programs.

Sincerely,

A handwritten signature in blue ink that reads "Bill Pluta".

Bill Pluta  
Director  
Strategic Planning and Reporting (SPAR) Department  
Illinois Housing Development Authority (IHDA)

**Financing the creation and preservation of affordable housing**

FINAL STATE OF ILLINOIS 2019 ACTION PLAN - PENDING HUD APPROVAL

**To:** Illinois Housing Development Authority  
**From:** Marca Bristo, Access Living  
**Re:** 2019 Consolidated Plan – Annual Action Plan

Access Living welcomes this opportunity to comment on the 2019 Annual Action Plan. We continue to value our long partnership with IHDA, and offer these comments as matters for possible further discussion and collaboration. The use of HUD formula funding is an important piece of the puzzle when finding new and innovative ways to create more affordable housing options for people with disabilities in the communities of their choice.

As we have discussed in the past and as we raised in our oral comments on May 30, we believe there are opportunities to use a small amount of dollars to leverage higher impact. Specifically, using money from the HOME Investment Partnership and/or National Housing Trust Fund programs to launch two possible pilots: one providing rental assistance to more units than are currently served by existing sources; and another either providing a new home modification grants program available directly to landlords or tenants, or enhancing existing mod programs like the Home Accessibility Program (HAP).

We realize there are logistical hurdles to clear. Tenant-based rental assistance with HOME funds (HOME TBRA) must be renewed every two years, and that could pose challenges. We would be happy to help explore ways to streamline that process should any kind of HOME TBRA pilot move forward. Also, we understand that IHDA provides home mods (mainly outside the City of Chicago) already through the HAP, but again, if a more streamlined process would increase capacity for more funding, we would welcome the opportunity to help define such a process.

It is hoped that these comments lead to new possibilities for housing disabled Illinoisans. As HUD formula funds continue to dwindle over time, we see clearly that every dollar must be stretched ever further. By making strategic investments now in pilots like those mentioned above, we believe that we can find ways to have a greater impact even as resources diminish. And if one day Federal funding levels begin to increase, we can potentially bring small but high-impact programs to scale and truly meet the housing needs of everyone in our great State.

Please contact our Housing and Transportation Policy Analyst Adam Ballard to discuss these matters further. He can be reached at [aballard@accessliving.org](mailto:aballard@accessliving.org) or (312) 640-2195.

Best,



Marca Bristo  
President and CEO  
Access Living



111 E. Wacker Drive  
Suite 1000  
Chicago, IL 60601  
312.026.9307

Access Living  
115 W Chicago Ave  
Chicago, IL 60654  
Attn: Marca Bristo

June 11, 2019

Dear Ms. Marca Bristo,

Thank you for your recent public comments letter on the draft Consolidated Plan-2019 Annual Action Plan regarding recommendations to increase affordable housing options for persons with disabilities. As your letter acknowledged, IHDA has worked with Access Living over a number of years on a variety of housing programs and initiatives to provide such assistance, and has always been willing to discuss possible options for further and/or expanded collaboration with your organization.

That being said, we briefly discussed possible pilot programs for rental assistance with Adam Ballard of Access Living at our recent (May 30<sup>th</sup>) public hearing. As IHDA has described in prior responses to similar recommendations, while rental assistance is in fact eligible under both the HOME Program (via tenant-based rental assistance) and the national Housing Trust Fund, it is very difficult to consider due to statutory and regulatory requirements. As I mentioned at the public hearing and you acknowledged in your letter, HOME funding limits TBRA to 2 years, subject to renewals. This is obviously problematic regarding displacement of such assisted tenants after that time period, as there are no other guaranteed sources of rental assistance currently available. This use of HOME funds also limits an already-strained funding source for affordable housing development, as it requires an annual commitment to serve the same population receiving such assistance, and additional HOME resources if any program expansion is considered.

A similar problem exists with the national Housing Trust Fund. While it is primarily targeted to rental housing serving persons/households at 30% AMI or below, it has a 2-year funding commitment deadline. This presents the same potential problem of displacement if future funding is not available, and again limits the scarce availability of affordable housing development funds, especially for this targeted population. As such, IHDA has thus far concentrated on funding permanent supportive housing projects with these limited funds.

Again, as we briefly stated at the recent public hearing, these statutory and regulatory barriers, especially the 2-year limit, need to be addressed first in any future discussion of possible pilot programs. It is not an issue of streamlining the process, but rather the regulatory issues cited

Financing the creation and preservation of affordable housing



here. Even given these restraints, IHDA is willing to further discuss possible future options for pilot programs with your agency. Please also note that, as you know, IHDA administers HUD's Section 811 rental assistance program, which is targeted to persons coming out of Institutions into community-based housing, which primarily serves persons with disabilities. Similarly, this population is one of the three priorities under the State-funded Rental Housing Support Program (RHSP). It should also be noted that based on legislation passed last year in the Illinois General Assembly, IHDA recently announced a special demonstration program under RHSP to serve the re-entry population, which frequently includes persons with disabilities.

Finally, IHDA is keenly aware of the need for ongoing funding under its Home Modification Program. IHDA's Board recently approved \$3 million to 16 local governments and non-profit organizations. This is funded under the State's Affordable Housing Trust Fund, which also funds single-family rehabilitation programs and multi-family projects, and has been subject to budget transfers in past years, which further limits its flexibility. In addition, IHDA does provide for statewide eligibility for this program, but also recognizes that close to 50 municipalities and counties in Illinois receive CDBG Entitlement funding on an annual basis, and do have other funding sources available that non-entitlement areas don't have access to. Funding of tenants directly under the program is problematic, as they do not own the subject property. Access to this program by landlords is already eligible, but requires a commitment to house persons with disabilities over a certain time period to receive such assistance. This is also not an issue of streamlining the process. Again, IHDA is willing to discuss future funding of this or an expanded program with your organization, as well as any ideas of streamlining either process that we may be overlooking.

In closing, thank you once again for your comments and interest in IHDA's programs.

Sincerely,



Bill Pluta  
Director  
Strategic Planning and Reporting (SPAR) Department  
Illinois Housing Development Authority (IHDA)

Illinois Housing Development Authority  
Strategic Planning and Research Department  
Office of Housing Coordination Services (OHCS)  
Attention: consolidated Plan  
111 E. Wacker Drive, suite 1000  
Chicago, Illinois 60601

Dear Sir or Madam,

My name is [REDACTED] living in a subsidized unit, at [REDACTED]  
[REDACTED] My email address is [REDACTED] I am writing to include if possible, this accommodation request for 2019 Action Plan.

The request for accommodation for people with HIV/Aids is as such. I consider my housing an integral part of my healing process, while I live with HIV1 infection. And of course the integrity of the housing unit is of prime importance for this purpose. Where currently I live, it has become a necessity to move away to another location in order to preserve my wellbeing and essentially my life. I explain, the subsidized unit that I live in, is not air tight, and massive amounts of emissions from free basing Methamphetamine/ synthetic Heroin leaks into my living space continuously from adjacent apartments. I am myself ascertained to be drug free resident, and of course exposure to such materials have harmed myself, requiring hospitalization and emergency room visit. It would be rational to house similar residents in the groupings together. Meaning, people with known history of substance abuse, to have their own grouping (pod), so they can hopefully recover and heal. And persons like me, in our groupings will not have to worry about exposure to harmful chemicals or harmful behavior occurring in adjacent units. This principal of groupings, of people needing psychiatric care for substance use and abuse is closely followed in medical settings to be sure. People that are classified "normal patients", the substance free individuals are admitted to the regular wards, and people with substance in their system are treated in psychiatric ward.

The most heinous aspect of inappropriate grouping of residents is exposing drug free residents to risky behaviors of addicts next to them. This is a true statement, more than one of my neighbors at this location, arrived to this housing absolutely drug free long ago, and later, they became addicted to Meth, because a neighbor enticed the person to use with him or her. Even more egregious situation, is a neighbor coming back from detox, and again being pulled into the vortex of the addicts group, and restarting the cycle of substance use and abuse (multiple individuals in this category).

Please help; I feel my chance of survival from my affliction has greatly decreased, because of this unsafe living environment. The principal of grouping should be definitely throughout a given building. It

is a sound practice, to admit ascertained people as substance free residents to a specific building location, and those with history of chemical dependency, similarly housed at a different building location. And best aspect is people wanting to move from a drug environment, will have a motivation to end the addiction cycle, and transfer to drug free places.

I apologize; this writing is more of a soliloquy, than an accommodation proposal, needing polishing, and further research. The medical setting division of space based upon the substance use history, is our guideline. There are large amounts of information available for the models used in medical settings. So the information is out there.

Currently, the Chicago police are the only agency given the responsibility of handling substance related transactions in a location in the city. Addiction related drug offences can be reduced requiring less policing, if only intervention happen early. And if drug free residents do not get exposed to substance abuse behavior in the first place in their living environment, the chance of substance related incidents later on decreases tenfold.

I appreciate the opportunity to share this for the betterment of our living situations.

Respectfully submitted,

A solid black rectangular box used to redact the signature of the author.

Dated May 21, 2019

FINAL STATE OF ILLINOIS 2019 ACTION PLAN - PENDING HUD APPROVAL

**From:** Grant, Deborah <Deborah.Grant@Illinois.gov>  
**Sent:** Tuesday, May 28, 2019 1:02 PM  
**To:** [REDACTED]  
**Cc:** Maras, Jeffrey P. <Jeffrey.P.Maras@Illinois.gov>  
**Subject:** Letter submitted regarding 2019 Action Plan Public Hearing

Dear [REDACTED],

This email is to inform you that the Illinois Department of Public Health received your letter from the Illinois Housing Development Authority regarding the State of Illinois HOPWA 2019 Action Plan. In your letter, you mentioned that current living situation is unsafe. We understand how important it is for you to live in an environment that is have safe. The HOPWA program is designed to ensure that persons living with HIV/AIDS have safe and decent housing. I am forwarding your concern to the City of Chicago and AIDS Foundation of Chicago HOPWA program so that they can conduct an investigation regarding your concern. Someone from these two entities will be contacting you. In the meantime, please know that we are doing everything we can to ensure that you receive a better living situation.

Sincerely,

Deborah Grant, Housing Coordinator

**Deborah Grant** | Illinois Department of Public Health | 525 West Jefferson Street | First Floor | Springfield, IL 62761-0001 | ☎ Tel: 800-825-3518 and Desk Tel: 217-785-5260 | 📠 Fax: 217-785-8013 | Visit Our Webpage: [www.idph.state.il.us](http://www.idph.state.il.us)

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**Grantee Unique Appendices**

**ILLINOIS HOUSING DEVELOPMENT AUTHORITY  
STANDARDS FOR  
ARCHITECTURAL PLANNING AND CONSTRUCTION**

*Published December, 18 2017*

*Effective for all projects receiving building permits after January 1, 2018*

**Content in *italic* indicates a revision from a previous version.**

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## **INTRODUCTION**

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The Standards for Architectural Planning and Construction (Standards) are being provided as an aid for owners/developers, architects and contractors for the design and construction of quality affordable housing. These Standards shall be used as a reference in establishing Illinois Housing Development Authority's (Authority) minimum quality standards. The Authority will use these standards to evaluate the plans, specifications and other relevant data of the proposed housing development, including new construction, rehabilitation and the adaptive reuse of existing buildings. We encourage users to exceed these minimum requirements whenever possible, making projects more viable and extending their longevity. By increasing items such as the building's energy efficiency, utilizing environmentally friendly materials, and insuring projects are more cost effective to construct and operate, the owner/developer, taxpayer and the end-user all benefit.

The Authority's design review will be based in-part by the following broad policy objectives:

- Compliance with the Standards to the greatest extent feasible per the scope of work, funding sources and Property Needs Assessment.
- The quality of the building(s) and other improvements must be consistent with the underwriting and program requirements.
- The project must comply with all local, state, and federal codes or regulations (including any applicable lead-based paint, mold, and asbestos regulations and any other Authority requirement).
- The development must be consistent with the demands of the marketplace.
- The design and construction must be consistent with recognized standards and accepted practices in the construction industry.
- The Authority reserves the right to object to any proposed building system or material selection as being in conflict with the Authority's interests.
- *Sponsors are encouraged to meet with IHDA Architectural staff prior to submitting rehabilitation projects seeking 4% Low Income Tax Credits to specifically discuss the intended project scope.*

The Standards are subject to change and modification, this version supersedes and replaces any prior versions. The Authority will also evaluate certain aspects of the Standards that may require modification in order to meet the unique site, design or use of the development. In this event, the Authority will consider modification requests on a case by case basis. It is therefore highly recommended that Authority staff be involved in the design concept at the

earliest stage possible to provide guidance through the review process. Lastly, the Authority or its agents shall have the right of access to the property.

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## Definitions

Unless otherwise expressly stated, the following terms shall, for the purposes of the Standards, have the meaning shown in this Section. Where terms are not defined in this Section, they shall have ordinarily accepted meanings such as the context implies.

**Accessible Dwelling Unit:** A unit that is approached, entered, and used by physically challenged people *and designed to meet all applicable code requirements*.

**Accessible Route:** A continuous unobstructed path connecting all accessible elements and spaces of a building or facility. Interior accessible routes may include corridors, doorways, floors, ramps, elevators, lifts, skywalks and tunnels. Exterior accessible routes may include parking access aisles, curb ramps, crosswalks at vehicular ways, walks, ramps, and lifts.

**Accessibility Standards:** Accessibility standards mean the *Federal Fair Housing Act*, Illinois Accessibility Code, Americans with Disabilities Act, local building codes, and Section 504 of the 1973 Rehabilitation Act.

**Adaptability or Adaptable:** The ability of certain building spaces and elements, such as: kitchen counters, sinks, and grab bars, to be added or altered so as to accommodate the needs of individuals with or without disabilities or to accommodate the needs of persons with different types or degrees of disability.

**Adaptable Dwelling Unit:** A dwelling unit constructed and equipped so it can be converted with minimal structural change for use by persons with different types and degrees of environmental limitation.

**Adaptive Reuse:** The process of converting or adapting structures for purposes or uses other than those initially intended.

**Addition:** An expansion, extension, or increase in the gross floor area of a building or facility.

**Alteration:** Any modification or renovation that affects or could affect the usability of the building or facility or part of the building or facility. Alteration includes\*, but is not limited to, remodeling, renovation, rehabilitation, reconstruction, historic preservation, historic reconstruction, historic restoration (as separately required in Section 400.610 of the Illinois Accessibility Code), changes or rearrangement of the structural parts or elements, extraordinary repairs (as defined herein), changes to or replacement of plumbing fixtures or controls, changes or rearrangement in the plan configuration of walls and full-height partitions, and changes or improvements to parking lots (as separately required in Section 400.510 (e) 10 (c)).

**\*The following work is not considered to be an alteration unless it affects the usability of the building or facility:** normal maintenance, re-roofing, interior or exterior redecoration, changes to mechanical and electrical systems, replacement of plumbing, piping or valves, asbestos removal, or installation of fire sprinkler systems. (Section 3, Environmental Barriers Act - EBA).

**Applicability:** The latest version of the Standards shall be used in conjunction with the design and construction of the project. The Owner and General Contractor shall incorporate these Standards into their contract and agree to abide by these Standards. If there is a conflict between these Standards and any provision in the contract these Standards shall prevail.

**Architect/Engineer of Record:** An architect, professional engineer, or structural engineer as defined by the Illinois Architecture Practice Act, the Illinois Professional Engineering Practice Act, or the Illinois Structural Engineering Licensing Act who has the contract responsibility for the project, who prepares the construction documents from which the building is constructed, and who signs the required documents.

**Architect/Engineer-Consulting:** An architect, professional engineer, or structural engineer as defined by the Illinois Architecture Practice Act, the Illinois Professional Engineering Practice Act, or the Illinois Structural Engineering Licensing Act who provides his professional services such as civil, mechanical, electrical and plumbing engineering and design, to the "Architect of Record".

**Area, Gross:** The total area of a building or part of a building measured from the outside face of the exterior walls, including areas of usable or occupiable basements, but not including areas of basements used for storage or mechanical purposes only, overhangs, and mechanical penthouses on the roof.

**Area, Net:** The total usable or occupiable area within the enclosing walls or partitions exclusive of shafts, partitions, columns, walls, elevators, stairs, permanent fixtures, toilet rooms, janitor closets, and mechanical, electrical, and telephone rooms.

**Area of Rescue Assistance:** An area, which has direct access to an exit, where people who are unable to use stairs may remain temporarily in safety to await further instructions or assistance during emergency evacuation.

**Building Code, Applicable:** The building code and applicable amendments, adopted by the administrative authority under whose jurisdiction the work involved with the construction, addition, alteration, or change of occupancy will be carried out. If no building code has been adopted by the administrative authority, or if the work is not within a municipal or other administrative authority's jurisdiction, the building code shall be deemed to be the 2015 International Building Code package.

**Change Order:** A written request prepared on A.I.A. Form G701 that changes the scope of work from the Authority approved drawings and specifications. The change order must be signed by the owner/developer, Architect of Record, and the contractor and presented to the IHDA field representative at least one month before requesting the payment on a draw.

**Clear Floor Space:** The minimum unobstructed floor or ground space required to accommodate a single, stationary wheelchair and occupant.

**Common Use or Common Areas:** Areas (including interior and exterior rooms, spaces, or elements) which are held out for use by all tenants, their guests, and owners in public facilities and multi-story housing units.

**Cross Slope:** The slope that is perpendicular to the direction of travel (see Running Slope).

**Curb Ramp:** A short ramp cutting through a curb or built up to it.

**Detectable Warning:** A standardized surface feature built in or applied to a walking surface or other element to warn people with visual impairments of hazards on the circulation path. The State of Illinois has adopted the truncated dome standard with a contrasting color to the base surface.

**Dwelling Unit:** A single residential unit which provides a kitchen or food preparation area, in addition to rooms and spaces for living, bathing, sleeping, and the like.

**Efficiency or Studio Unit:** A unit used or intended to be used as a residential housekeeping unit by not more than one occupant for living, sleeping, and cooking facilities. The unit shall contain not less than *the area indicated in Section 12.01 of these standards*.

**Emergency Warning System:** A fire alarm, carbon monoxide, smoke or heat detector system used to activate emergency audible and visual alarms.

**Entrance:** Any access point to a building or portion of a building used for the purpose of entering. An entrance includes the approach walk, the vertical access leading to the entrance platform itself, vestibules, if provided, and the entry door or doors or gate or gates.

**Environmental Barrier:** An element or space of the built environment which limits accessibility to or use of the built environment by environmentally limited persons.

**Exit:** That portion of a means of egress which is separated from all other spaces of a building or structure by construction or equipment as required by the applicable building code to provide a protected way of travel to the exit discharge. The walls, ceiling, and openings therein, of the protected way of travel shall provide a fire resistance rating required by the applicable building code.

**Exit Access:** That portion of a means of egress that leads to an exit.

**Exit Discharge:** That portion of a means of egress between the termination of an exit and a public way.

**Extraordinary Repair:** The replacement or renewal of any element of an existing building or facility for purposes other than normal routine maintenance. It includes, but is not limited to: replacement of sidewalk and curb ramp, replacement of a door and frame, complete stair replacement and plumbing fixture replacement (see Alteration).

**Facility:** All or any portion of buildings, structures, site improvements, complexes, equipment, roads, walks, passageways, parking lots, or other real or personal property located on a site (see Public Facility).

**Floor:** Any level within a building that may be occupied by the public. Mezzanines and seating tiers are not included in the definition of “Floor” in the Illinois Accessibility Code.

**Functional Spaces:** The rooms or spaces in a building or facility that house the primary functions for which the building or facility is intended, and the secondary or supporting functions that relate to the support, maintenance or performance of the primary functions, including connective or ancillary space such as parking and storage. Unfinished or undeveloped space is included as a “Functional Space”.

**General Contractor:** A general contractor (GC) is responsible for providing all of the material, labor, equipment and services necessary for the construction of a project. The GC is responsible for the day-to-day oversight of a construction site, management of vendors and trades and communication of information to involved parties throughout the course of construction.

**Governmental Unit:** The State or any political subdivision thereof, including but not limited to any county, town, township, city, village, municipality, municipal corporation, school district, park district, sanitary district, local housing authority, public commission, public authority, the Authority or other special purpose district.

**Grade:** The elevation of the finished surface of the ground, paving, or sidewalk within the area between the building and an imaginary line five feet (5') from the building.

**Ground Floor:** Any occupiable floor less than one story above or below grade with direct access to grade. A building or facility always has at least one ground floor and may have more than one ground floor as where a split-level entrance has been provided or where a building is built into a hillside. A building where the first floor containing dwelling units is above grade that floor will be considered the ground floor. For example, a grade level or slightly below grade floor contains parking, laundry, building office, and storage is not considered a ground floor. The first floor in a building of this type containing dwelling units will be considered the ground floor

**Habitable Room:** A room within a residential occupancy and used or intended to be used for living, sleeping, eating or cooking purposes, as well as any room within a residential occupancy but does not include bathrooms, toilet rooms laundries, pantries, foyers, corridors, storage spaces, stairways or closets.

**Historic Building:** All buildings, parts of buildings, facilities or sites individually listed in or eligible for listing in the National Register of Historic Places, a “contributing” building or site in a National Register Historic District as determined by the Illinois Historic Preservation Agency (IHPA) or as determined by a “Certified Local Government” designated by the IHPA, a building or site designated as a historic or architectural landmark by a local Landmarks Commission or local Historic Preservation Commission, and buildings which undergo historic reconstruction.

**Historic Preservation:** The act or process of accurately preserving and/or recovering the form and details of a historic building and its setting as it appeared at a particular period of time by means of repair, stabilization, or restoration as defined herein. Historic Preservation also includes “Historic Reconstruction and Historic Restoration”.

**Historic Reconstruction:** The act or process of reproducing by new construction the exact form and detail of an original building, structure, object, or part thereof as it appeared at a specific period of time. Historic Reconstruction only applies to reconstruction of buildings which are open to view by the public, are used to demonstrate historic or architectural values, and/or are used for purposes of display of a historic building type, design, and technique of construction or period setting.

**Historic Restoration:** The act or process of accurately recovering the form and details of a building or facility and its setting as it appeared at a particular period of time by means of the removal of later works or replacement of missing earlier work.

**Housing, Financed or Guaranteed by a Governmental Unit:** Any building, facility or portion thereof, excluding in-patient medical care facilities, which contains one or more dwelling units or sleeping accommodations, and which is owned by or on behalf of a governmental unit, or financed, in whole or in part, for either initial construction or subsequent alteration, by a grant or loan made or guaranteed by a governmental unit. Such housing may include, but is not limited to, one family dwellings and multi-family dwellings, including multi-story apartment buildings, group homes, dormitories and housing for the elderly.

**Interior Redecoration:** Replacement of interior floor, wall, and ceiling decorative finishes (such as carpet, wall coverings, paint, and paneling), window treatments (such as drapery, blinds, and shades), interior space lighting,

fixtures, furnishings, and furniture.

**Masonry Unit:** Brick, tile, stone, glass block or concrete block conforming to the requirements specified in Section 2103 of the 2012 International Building Code.

**Means of Egress:** A continuous and unobstructed path of travel from any point in a building or structure to a public way, consisting of three separate and distinct parts: the exit access, the exit, and the exit discharge. A means of egress comprises vertical and horizontal means of travel and includes intervening room spaces, doors, hallways, corridors, passageways, balconies, ramps, stairs, enclosures, lobbies, escalators, horizontal exits, courts and yards. (Section 3, EBA).

**Mezzanine:** Any intermediate occupiable and usable level placed above any floor of a building and limited to 33% of the net floor area of the floor over which it is placed. The net area of a mezzanine is included in the net area of the floor above which it is placed.

**Multi-Story Building:** Any building of any type two or more stories above the grade level containing any number of units.

**Multi-Story Housing Unit:** Any building of four or more stories containing ten or more dwelling units constructed to be held out for sale or lease by any person to the public. This category includes, but is not limited to, the following building types: apartment buildings, condominium apartment buildings, convents, housing for the elderly and monasteries.

**Other Alterations (Section 504):** If the project involves fewer than 15 units or the cost of alterations is less than 75% of the replacement cost of the completed facility and the recipient has not made 5% of its units in the development accessible to and usable by individuals with disabilities, then the requirements of 24 CFR 8.23(b) apply. Under this section, alterations to dwelling units shall, to the maximum extent feasible, be made readily accessible to and usable by individuals with disabilities. If alterations to single elements or spaces of a dwelling unit, when considered together, amount to an alteration of a dwelling unit, the entire unit shall be made accessible. Alteration of an entire unit is considered to be when at least all of the following individual elements are replaced:

- renovation of whole kitchens, or at least replacement of kitchen cabinets; and
- renovation of the bathroom, if at least bathtub or shower is replaced or added, or a toilet and flooring is replaced; and
- replacement of entrance door jambs.

When the entire unit is not being altered, 100% of the single elements being altered must be made accessible until 5% of the units in the development are accessible. However, HUD strongly encourages a recipient to make 5% of the units in a development readily accessible to and usable by individuals with mobility impairments, since that will avoid the necessity of making every element altered accessible, which often may result in having partially accessible units which may be of little or no value for persons with mobility impairments. It is also more likely that the cost of making 5% of the units accessible up front will be less than making each and every element altered accessible. Alterations must meet the applicable sections of the UFAS which govern alterations.

**Point of Arrival:** A location within the site where an accessible route must be provided. Acceptable locations shall include an accessible parking space, accessible passenger unloading/loading zone, public street or sidewalk, or each public transportation stop.

**Power-Assisted Door:** A door used for human passage, with a mechanism that helps to open the door, or relieves the opening resistance of the door, upon the activation of a switch or a continued force applied to the door itself.

**Principal or Primary Entrance:** An entrance intended to be used by the residents or users to enter or leave a building or facility. This shall include, but is not limited to, the main entrance.

**Privately Owned Building:** Any building which is not publicly owned as defined herein.

**Project:** Any building, structure or site including the related improvements owned or financed in whole or in part by the Authority, or one in which the Authority has or will have an interest.

**Public:** Any group of people who are users of the building and employees of the building, excluding those people

who are employed by the owner of a building for construction or alteration of a building.

**Public Facility:** Any building, structure, or site improvement which is: (i) owned by or on behalf of a governmental unit; leased, rented or used, in whole or in part, by a governmental unit; financed, in whole or in part, by a grant or a loan made or guaranteed by a governmental unit. (ii) used or held out for use or intended for use by the public or by employees for one or more of, but not limited to, the following: the purpose of gathering, recreation, transient lodging, education, employment, institutional care, or the purchase, rental, sale or acquisition of any goods, personal property or services; places of public display or collection; social service establishments; and stations used for specified public transportation.

**Public Use:** Interior and exterior rooms or spaces that are made available to the general public at a building or facility that is privately or publicly owned.

**Ramp:** A walking surface which has a running slope greater than 1:20 (5%) and a cross slope no greater than 1:50 (2%).

**Reproduction Cost:** The estimated cost of constructing a new building, structure, or site improvement of like size, design and materials at the site of the original building, structure, or site improvement, assuming such site is clear. The reproduction cost shall be determined by using the recognized standards of an authoritative technical organization (see Authoritative Technical Organization for examples of estimating guides).

**Running Slope:** The slope that is parallel to the direction of travel (see Cross Slope).

**Service Entrance:** An entrance intended primarily for delivery of goods or services. A service entrance may not be the principal entrance unless it is the only entrance to the building/facility.

**Single Room Occupancy Unit or SRO** A unit used or intended to be used as a residential housekeeping unit by not more than one occupant for living, sleeping, with or without cooking facilities. *See Section 12.01 for area requirements.*

**Storage, Bulk:** A clear volume space provided for storage of personal items such as luggage, boxes of seasonal items or any bulk items. The space may be located in the dwelling unit, in a separate room in the building, or in a separate building on the same site.

**Structural Change:** Changes to or rearrangement of the structural elements, plumbing fixture changes, or changes to or rearrangement of the plan configuration of walls and full height partitions.

**Structurally Impracticable:** Those rare circumstances when the unique characteristics of terrain prevent the incorporation of accessibility features in new construction.

**Substantial Alteration (Section 504):** Alterations are substantial if they are undertaken to a project that has 15 or more units and the cost of the alterations is 75% or more of the replacement cost of the completed facility. [See 24 CFR 8.23(a)]. The new construction provisions of 24 CFR 8.22 shall apply. Section 8.22 requires that a minimum of 5% of the dwelling units, or at least one unit, whichever is greater, shall be made accessible to persons with mobility disabilities and an additional 2% of the dwelling units, or at least one unit, whichever is greater, shall be made accessible to persons with hearing or visual disabilities.

**Technically Infeasible:** With respect to an alteration of a building or a facility, a change that has little likelihood of being accomplished because existing structural conditions would require removing or altering a load-bearing member, which is an essential part of the structural frame; or because other existing physical or site constraints prohibit modification or addition of elements, spaces or features which are in full and strict compliance with the minimum requirements for new construction and which are necessary to provide accessibility. (ADA Accessibility Guidelines 4.1.6)

**Toilet or Powder Rooms:** At a minimum, a room consisting of one water closet and one lavatory.

**Vehicular Way:** A route intended for vehicular traffic, such as a street, driveway or parking lot.

**Visitability:** The requirement that all single-family homes, townhouses, multi-story housing units, and multi-family apartment units provide accessible features that permit people with mobility impairments to visit (enter and stay, but not live in) a residence.

## 1) Fees and Costs

IHDA reserves the right to utilize outside consultants or other professionals as it may deem appropriate, to conduct various aspects in conjunction with the Architecture and Construction Services functions related to the completion of the project. IHDA shall determine if some or all of these costs shall be funded by the borrower/developer.

Only fees and cost incurred relating to the financed project shall be permitted. IHDA will not pay for fees and costs relating to future phases of the project.

The Authority shall review the architectural and general contracting fees associated with the development to insure they are proper, fair and reasonable. The Authority has evaluated the fees from past Authority financed projects. These fees were based on the percentage of the construction costs (site work, general requirements, general contractor's overhead and profit, construction permits and fees). As such, the architectural and general contractor fees listed below reflect the maximum percentage the Authority will accept as a reasonable fee for services. Higher percentages for the architectural fees are acceptable but the owner/developer will be responsible to pay the difference between the higher percentage and the percentage in the table below. The fees shall include the following:

### Architectural

- 1.00** *The "Architect of Record" shall be same individual who created the plans and specifications. Any on-site architectural supervision shall be conducted by the "Architect of Record". The Architect is responsible for certifying that all the work requested for payment is accurate and has been completed.*
- 1.01** Preparation of plans and specifications including consultations, estimates, and professional engineering services typically associated with the architectural portion of the plans, including structural design and Landscape Architecture. Architectural fees shall not include any work or contractual obligations of other professional services such as: surveys, soil borings, Civil Engineering and third party consultant reports.
- 1.02** General administration, *reimbursables as per the Contract between Architect and Owner* and overall supervision of construction.
- 1.03** Approving payment vouchers to the contractor.
- 1.04** Approval and acceptance of completed construction.
- 1.05** The "Architect of Record" **will not** be permitted to act as the general contractor without the written approval of the Authority. If the "Architect of Record" sub-contracts any portion of his work, excluding professional engineering services, the difference between the architect's contract fee and the sub-contractors' fee will cause a reduction in the Developers' Fee.
- 1.06** *Any project utilizing an Architect's "Self-Certification" permit review may be subject to design and construction costs after the design documents have been completed and approved by the Authority. The Authority will not be responsible to fund any of the related changes from the initial approved plans and specs from construction contingency, but instead will expect these expenses to be paid from either trade line savings or other project sources including non-reimbursable realized developer fee.*

Architectural Fee in excess of the IHDA limits listed below cannot be kept in basis and may be paid from a non-IHDA source.

Total Construction Costs \$	% Architect Fee (New Construction)	% Architect Fee (Renovation)	% Civil Engineering Fee
0-1,000,000	7.2	8.4	2.0
1,000,001-5,000,000	6.2	7.3	1.8
5,000,001-10,000,000	4.8	6.7	1.5
10,000,001-15,000,000	4.1	5.9	1.3
15,000,001-25,000,000	3.4	5.1	1.0
Over 25,000,000	2.8	4.4	1.0

## General Contractor

The General Contractor (GC) needs to obtain Authority approval prior to the commencement of any work. The Authority shall evaluate the GC's past performance in addition to the requirements as indicated on the General Contractor Certification (Addendum #1). *The Authority reserves the right to deny a project's funding where a proposed contractor does not meet the standards established in this certification, or if the contractor's past history with the authority does not meet a high quality standard of construction expected to be provided for all projects.* The Authority shall review the Contract for Construction with the owner. All Contracts for General Construction must be a Stipulated Sum or Lump Sum contract. No project shall be completed with a Guaranteed Maximum Price or a Cost Plus style contract. The final sum contract must be agreed upon with the owner prior to Authority review and be in accordance with the approved project budget. Work started prior to Authority approval may put the proposed funding at risk. The Authority shall not be responsible for payment or compensation *to the contractor* if funding is lost because of unauthorized activity.

**1.07** The general contractor *is* allowed "Profit" in the amount of 6%, "Overhead" in the amount of 2% and "General Conditions" (a.k.a. general requirements) in the amount of 6%, all of which are maximum amounts calculated from the hard construction costs.

**1.08** **Profit** is defined as the proceeds of transaction minus the cost, including intangibles such as contract incentives. Individual mark-up is not allowed on GC supplied materials or the total "Profit" line item on the Contractors Sworn Statement will be reduced accordingly. If this is insufficient, then deductions will be made to the General Conditions and/or Overhead lines.

**Overhead** being the expenses necessary to conduct a business. Cost shall also include those specific to the project and include transportation, travel expenses, temporary housing etc.

In the event there is an identity of interest between the owner/developer and general contractor, the following will apply: (a) the developer fee will be reduced 2% through the Authority's underwriting process (via the Authority's Multifamily Application), or (b) the general contractor's 2% overhead shall be eliminated. Limited partnerships, joint ventures and other types of associations between the owners and the general contractor shall be subject to the Authority's limitations on Overhead.

**General Conditions** are the functions needed to complete the construction phase and shall include the following costs: project *manager* and superintendent, *draw related paperwork, layout, surveys, plans/printing, material testing, communications, mobilization, temporary heat and utilities, portable toilets, temporary fencing, OSHA protection, field office, hoisting equipment, security, small tools, disposal, construction photography, cost certifications, audits, mock-ups, daily construction site cleaning, final clean, general labor, etc., essentially including, but not limited to, items identified within Construction Specifications Institute (CSI) Master Format Divisions 0 and 1 within the project manual (when provided).* As the GC is responsible for these functions any subcontracting of these out to lower tier subcontractors will be evaluated against the stated limit, and may reduce the amount of the GC's General Conditions percentage a GC can collect accordingly.

Financing, holding charges or other types of construction related interest shall be included in the Overhead or General Conditions calculation.

Payment for any shop drawings will be limited to 5% of the total cost for that line item.

The construction budget shall include any costs resulting from scheduling delays or seasonal constraints such as winter conditions, water extraction from recent rains, etc. These items are not considered contingency eligible on change order requests.

When a contractor is acting in the capacity of a “GC” they shall provide all the functions typically associated with the position. The GC is responsible for the overall construction management aspects and tasks involved from the Project’s start-up through final completion. Functions include (but are not limited to):



scheduling, coordination of the trades, supervision, safety, program compliance, monitoring, *and all other means and methods required to complete the construction of the project.* As such the Authority will not allow for a “Straw” GC or a firm which reaps the benefits and fees associated with the GC title but in reality subcontracts these functions to another GC or *separately contracted individual to perform these duties in place of a primary employee of the GC.* Subsequently the GC *is expected* to be on the site during construction and at least daily, *and maintain a daily log documenting the progress of the work to be available for review upon Authority request.* Similarly any side agreements to the contrary or kickbacks will result in forfeiture of any future work with the Authority.

**Construction Performance Bonds and/or a Letters of Credit.** The Authority will require either: (a) Payment and Performance Bond by a company approved by the Authority equal to one hundred (100%) percent of the cost of construction of the development or (b) Unconditional, irrevocable commercial letter of credit, issued by a financial institution approved by the Authority, in an amount equal to twenty-five (25%) of the cost of construction of the development. *This is not required for projects receiving LIHTC financing only or seeking bond only financing with 4% Tax Credits. If a project is seeking additional financing in combination with these sources, the bond must be provided as described above.*

**1.08 All Construction Related Costs** required to complete the project shall be determined prior to the project obtaining IHDA Board approval. The construction budget needs to be complete including all value engineering, permit review requirements, proper wages, etc. *Any deletion of Authority required work items (as indicated the IHDA Architectural and Construction Standards, QAP requirements, etc.) from the scope due to costs will not be approved, nor will the utilization of the contingency to pay for these items.* Additional funding for increased construction budget costs shall be the responsibility of the Developer or General Contractor and not the Authority.

In all instances where *any contract agreement* results in cost savings at the completion of the Project, the disposition of any savings shall be in the sole discretion of IHDA.

Material suppliers for construction related products shall be identified on the contractors sworn accordingly. *Draws for materials and/or furniture, fixtures and equipment (FF&E) can only occur when they have been properly installed and inspected by the IHDA Field Construction Representative.*

**1.09 Furniture, Fixtures and Equipment (FF&E)**

Furniture, Fixtures and Equipment expenses are eligible for reimbursement. However they must be for qualified items which mirror the FF&E designation.

**Furniture**

Items which are generally used by the residents, guests and staff for living and operating the project. Examples include beds, desks, chairs, couches, office file cabinets, etc.

**Fixtures**

Items which were once personal property but due to permanent attachment is now considered as being part of the real estate. Examples include window blinds, built-in cabinetry, etc.

**Equipment**

Items having a contributory association with the operation of the project. Equipment is usually considered personal property as it's not readily attached to the real estate. Examples include computers, laundry equipment, appliances, snow blowers, etc.

Supplies are considered general purpose items and not eligible for reimbursement from the FF&E budget. Examples of supplies are hand and power tools, mops, cleaning solutions, trash cans, garden utensils, portable sports equipment, computer ink and paper, etc. Hand held tools including power tools or other related items that could be removed from the designated shop or location are supplies.

None of the aforementioned items represents a complete list and payment of these items will be at the

Authority's discretion. These items shall be in new condition or if refurbished will require Authority approval.

### **1.10 Subcontractor Bid Submittals**

When making application to the Authority the GC shall provide bids from the proposed subcontractors to substantiate the total construction contract. These bids shall be required from all the major trades (Mechanical, Plumbing, Electrical, Carpentry, Excavation, Concrete, Roofing, Fire Suppression, etc.) and reconcile with the respective line items in the Contractors Sworn Statement.

## **2) Codes and Regulations**

The project shall comply with applicable zoning ordinances (including variances or amendments), these Standards and building codes. The project shall obtain all necessary building permits and required inspections to obtain a certificate of occupancy for conversion/new construction, or a final approval for rehabilitation/renovation projects. All jurisdictions in the state of Illinois shall comply with the *2015 International Energy Conservation Code with state amendments*.

If there is a conflict between the requirements of the applicable codes and/or these Standards, the most stringent requirement will prevail. If there are any questions regarding the codes, the owner/developer or his architect shall consult with Authority Architectural Services staff to determine whether the proposed development would be subject to such requirements. During the construction process, owners/developers and/or architects will be asked to certify compliance with applicable regulations. The Authority or its representatives will check for compliance with standards set forth by federal, state and local regulations.

The following codes and regulations shall be used in preparation of the drawings and specifications:

**2.00** *The Standards applies to all buildings owned or financed in whole or in part by the Authority.*

**2.01** **Local Building Codes:** In areas where there is no local governing building code, the requirements indicated in the **2015 International Code Package** will apply. IRC Section R313 is deleted.

**2.02** *The Americans with Disabilities Act applies to the common areas open for public use, such as a property management or rental office and community room areas including the kitchen.*

**2.03** **Federal Fair Housing Act** applies to all **new** multi-family housing consisting of four or more dwelling units *per building* built for first occupancy after March 13, 1991.

The Architect of Record will be required to survey the entire project and certify compliance with the Federal Fair Housing Act for those buildings built for first occupancy after March 13, 1991 and buildings where the last building permit or renewal thereof was issued after June 15, 1990 before any new addition or alteration to those buildings will be approved by the Authority

**2.04** **Illinois Accessibility Code (current edition)** applies to all "public facilities" and "multi-story housing units" as defined and governed by the Environmental Barriers Act (EBA) and located, in whole or in part, within the legal geographic boundaries of the State of Illinois, unless specifically exempted. This Code is applicable when work involving new construction of projects containing five or more units, alterations, additions, historic preservation, restoration, or reconstruction in whole or in part begins after the effective date of this Code.

The Illinois Accessibility Code together with the Environmental Barriers Act and the standards incorporated by reference identified in Section 400.120 has the force of a building code and as such is law in the State of Illinois.

**2.05** The **ICC/ANSI A117.1-Latest Version** applies to projects seeking Tax Credits, either through tax-exempt bonds (4% Tax Credits) or through the competitive round (9% Tax Credits).

**2.06** **Section 504 of the Rehabilitation Act of 1973 (29 U.S.C 794)** applies to recipients of federal financial

assistance.

- 2.07 Illinois State Plumbing Code (current edition)**
- 2.08 National Electrical Code (current edition)**
- 2.09 2015 International Energy Conservation Code with state amendments is mandatory in all jurisdictions in the state of Illinois**
- 2.10 Minimum Property Standards for Housing (MPS) U.S. Department of Housing and Urban Development (HUD)**
- 2.11 24 CFR Parts 3280 of the Manufactured Home Construction and Safety Standards**
- 2.12 Title 89 Illinois Administrative Code, Subpart B: Supportive Living Facilities**
- 2.13 Lead Based Paint Hazards:** The Project shall comply with the applicable lead based paint regulations as outlined in the Authority's Lead Based Paint Compliance Guide which can be found at: <http://www.ihda.org/developer/architectureConstructionServices.htm>. All federally-assisted projects having units constructed before 1978 must comply with Title X of the Housing and Community Redevelopment Act of 1992 regulations found in 24 CFR Part 35 and the Illinois Lead Poisoning Prevention Code, 77 IL. Admin. Code 845. In addition, all properties and/or units must comply with the Environmental Protection Agency, final rule developed under the Toxic Substances and Control Act specifically 40 CFR Part 745, as it relates to the Lead Renovation, Repair, and Painting Program.
- 2.14 Asbestos Containing Materials:** All federally-assisted projects must comply with EPA 40 CFR 61.145 and all other HUD, EPA, IEPA and Illinois Department of Public Health (IDPH) regulations.
- 2.15 Radon:** All federally-assisted projects must comply with the Illinois Emergency Management Agency Radon program and the EPA's radon guidelines. When radon mitigation is *either recommended or* required, at a minimum a passive-future active system shall be installed. For further information, visit: <http://radon.illinois.gov/> and <http://www.epa.gov/radon/index.html>
- 2.16 Mold considerations:**  
Fact Sheets from IDPH: <http://www.idph.state.il.us/envhealth/factsheets/mold.htm>  
<http://www.idph.state.il.us/envhealth/factsheets/moisture.htm>  
EPA Mold Site: <http://www.epa.gov/mold/>
- 2.17 Illinois State Prevailing Wages or Federal Davis-Bacon Prevailing Wage requirements will be mandated on IHDA financed projects having construction related activities. Section 3 will apply were required. See links below to respective guidelines and websites.**
- **IHDA Davis Bacon Compliance Guide**  
<http://www.ihda.org/developer/architectureConstructionServices.htm>
  - **Illinois Prevailing Wage Website**  
<http://www.state.il.us/agency/idol/RATES/RATES.HTM>
  - **Section 3 Plan and Compliance Guide**  
<http://www.ihda.org/developer/architectureConstructionServices.htm>

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## CONSTRUCTION PHASE

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### 3) Pre-closing and Preconstruction Meetings

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3.01 The Authority will convene two meetings prior to the construction start. It is expected the sponsor and general contractor will be present in the Pre-closing meeting. The sponsor, their Architect, the General Contractor and all subcontractors must attend the Preconstruction meeting. In addition, the sponsor's and GC's representative responsible for completing and forwarding the various documents should be present at the preconstruction meeting as well.

3.02 The following items will be reviewed at these meetings:

- Payout Procedures for both sponsor and GC.
  - The Authority does not pay for stored materials or furniture, fixtures and equipment (FF&E) until installed and inspected by the IHDA Construction Field Representative.
  - Retention reduction; 10% retention must be retained up to 95% completion, then reduced to 5% if occupiable, has a C of O, G704, IHDA Permission to Occupy, IHDA Completion Certificate and IHDA's Field Representative approval. Retention does not apply to change orders, insurance, bonds or permits. For single family and scattered site projects only, IHDA will allow retention reduction based upon individual site completion as identified on an individual Contractors Sworn Statement for each individual site. Retention shall be reduced from 10% to 5% for the individual site after it has achieved an individual C of O, and completed the IHDA Permission to Occupy, IHDA Completion Certificate and the IHDA Field Representative's approval for that particular property/site.
  - The GC will submit a Contractors Sworn Statement (as approved by the Authority). In addition, the GC and all subcontractors must submit G702's and G703's. All documents must be submitted to the Authority's Field Representative at least two days prior to the draw inspection.
- Wage Guidelines (Davis Bacon or Illinois Prevailing Wage whichever is applicable).
- Section 3 Hiring Guidelines, if applicable.
- Change Order Process
- Lead Based Paint and Asbestos Containing Material Regulations, if applicable.

**3.03 Payout Procedures**

- All parties must comply with the Authority's current policies and procedures for processing draw requests.

### 4) Change Orders and Contingency Funds

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When a modification to the construction contract is requested, an AIA G701 Change Order form executed by the owner/developer, general contractor and architect must be submitted to the Authority's Construction Field Representative at least one month prior to submitting the change order to the Authority for payment. The owner/developer must also include along with the change order a letter clearly explaining the reasons for the change order and any other documents to justify the change. The IHDA Construction Field Representative needs to verify the pre-existing condition and the change order's finished product. *The Architect and GC need to ensure the items being requested on the change order are not already included in the plans, specifications or the various contract documents.* It is the GC's responsibility to fully document the before and after conditions and provide the Authority with photographs, if requested.

The Authority's Architecture Staff will determine if the change order qualifies for contingency funding. If it does not qualify for contingency funding, the funding will be made from some other source, including the realized developer fee. The Architecture Staff will inform the Construction Staff of the funding determination, who will then notify the owner/developer of that determination. It is important to keep change orders up-to-date to avoid delays in payment.

Failure to submit change orders in a timely manner may result in payment delay or non-payment. The owner/developer assumes all risk (both monetary and construction rework) in completing change order work

without prior IHDA approval. Any non-approved change order work completed which results in non-compliance with any building, accessibility, sustainability, municipal codes, IHDA standards or 9% LIHTC application scoring commitments will be the responsibility of the owner/developer.

The construction contingency will only be available to fund unforeseen construction costs and not to be used to fund soft costs, developer fees, up-grades and betterments, *Architect/Engineer errors or omissions*, reserves or other costs the Authority deems ineligible at the time. When the project has been determined by IHDA Staff to be ≥75% complete and sufficient funds remain in the construction contingency, the owner/developer may seek reimbursement from the construction contingency for all new change orders (including up-grades or betterments) and previously paid change orders funded from any other source. Typically, upgrades and betterments will not be reimbursed unless approved by the Authority, *and changes resulting from Architect/Engineer errors or omissions shall not be reimbursed with contingency funds at any time*. Any deviation of the IHDA change order process could result in the loss of all or a portion of Authority funding.

Construction contingency funds are available only to the owner/developer and shall be reflected accordingly on the owner's sworn statement. *Owners or Contractors shall not include any additional contingency amount for either hard or soft costs in their bid over and above what is required per underwriting standards for the project*. Contractors shall not enter into any agreement with the owner in accessing or splitting owner contingency funds. In addition there shall be no utilization of cost savings (difference between contractors bid and actual subcontractor amount) on the project without prior approval from IHDA. Cost savings under a fixed price contract do not automatically accrue to the Contractor or owner.

**4.01** The following criteria will be followed to determine when a *change order WILL be allowed to be paid from available contingency funds*:

- a. **Concealed Condition** – Unforeseen items may be approved for payment from the construction contingency.
- b. **Construction Cost Increases** – If the cost increases are proven to be caused by market uncertainty and the rapid rise in construction material costs, the funds from the construction contingency may be used to pay for the cost increases
- c. **Upgrades (Betterments)** – will not be approved for payment from the construction contingency but may be paid from the available escrowed realized developer fee or another source of funding. *These may be converted to use contingency funds once the project has achieved 75% completion with enough funds remaining.*

**4.02** The following criteria will be followed to determine when a *change order WILL NOT be allowed to be paid from available contingency funds*:

- a. **Contractor Negligence** – Any damage or neglect by the Contractor will not be paid from the construction contingency but may be paid from the available escrowed realized developer fee, if approved by the developer, or another source of funding.
- b. **Building Code Related Issues** – are foreseeable costs and will not be approved for payment from the construction contingency but may be paid from the available escrowed realized developer fee or another source of funding.
- c. **Architects, Engineers and Contractors Errors and Omissions and Additional Architectural and Engineering Fees** - will not be approved for payment from the construction contingency but may be paid from the available escrowed realized developer fee or another source of funding.
- d. **Building Inspector or any Municipal Official Requirements** – if not required by the Building Code, will not be approved for payment from the construction contingency but may be paid from the available escrowed realized developer fee or another source of funding. This includes items identified by municipal inspectors after the start of construction for projects utilizing a self-certification permit path.
- e. **Separate contracts outside of the General Contract:** When a separate contract is let by the owner for work to be performed outside of the General Contractor's Scope of work and there are additional costs incurred, these costs will **not** be paid from the construction contingency. A separate contingency should be established within that contract to address any cost overruns.

- f. **Damage or theft:** The Developer and/or GC are primarily responsible for having sufficient insurance coverage to fund any losses due to damage, theft or other occurrences covered in their policy. Claiming to have a large deductible or a potential increase in the insurance premium will not be considered.*
- g. **Seasonal Constraints-** such as winter conditions, water extraction from recent rains or other costs that could result in scheduling delays will not be approved from the construction contingency. These items should be anticipated and included in the construction budget.*
- h. **Other:** Any additional architectural, engineering, or other services outside of the scope of work that may be required will not be paid from the construction contingency but may be paid from the Developer's Fee or some other source of funding. In addition, extended warranties or contractor incentives are not eligible.*

## 5) Construction Close Out

Prior to final project close out, several criteria must be met for IHDA construction and architectural staff to give their final approval.

5.01 When the project is 95% complete, prior to final project close out, several criteria must be met in order for Construction and Architectural Services to give their approval to reduce retention to 5%.

- The building must be occupiable.
- *Certificate of Occupancy or Final Inspection from the governing jurisdiction (if applicable).*
- Two copies of the A.I.A. G704 must be submitted to the Construction Field Representative.
- Two copies of the IHDA Certificate of Completion (Form CD-4) must be submitted to the Construction Field Representative. Showing hold back for punch list items. Form can be found at: <http://www.ihda.org/developer/architectureConstructionServices.htm>
- Two copies of the IHDA Permission to Occupy must be submitted to the Construction Field Representative. Form can be found at: <http://www.ihda.org/developer/architectureConstructionServices.htm>
- IHDA Construction Field Representative approval.
- For projects receiving tax credits for *Universal Design* and/or Green Initiatives, IHDA Architectural Services final inspection approval *of the items identified for scoring.*
  - a.** At final project close-out: Projects awarded funding based on scoring in any green category must submit the applicable 3<sup>rd</sup> party certification, green maintenance/tenant manual, and videos (if applicable).

5.02 When the project is 100% complete, including punch list items, the IHDA Construction Field Representative will verify and inform the *IHDA Manager of Architecture and Construction*. The *IHDA Manager of Architecture and Construction* will approve final 5% retention release.

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## DESIGN PHASE

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### 6) Plan Review Process

Once the Authority has determined the project is feasible, the owner/developer shall submit completed project drawings and specifications to Architectural Services for their respective review. This review and approval must take place prior to the project initial closing. Any major modifications to the project after architectural approval and before initial closing must be approved by the Authority and possibly the IHDA Board.

Before construction begins, two signed and sealed copies of the complete "For Construction" drawings (one full size and one half-size), two specifications and a CD with PDFs of the drawings *and specifications* shall be submitted to the Authority. This set shall incorporate all changes required by the municipal authorities, all applicable comments made by the Authority; all approved "value engineering" changes and any applicable comments made



by other governmental agencies (HUD, IEPA, etc.).

The drawings and specifications must be prepared under direct supervision of an Illinois Licensed Architect in accordance with the Architectural Practice Act, bear the license number of the architect, and if the architect is part of any business structure other than a sole proprietorship, he or she must include the Project Design Firm registration number on the drawings. The drawings are required to be signed and sealed by the design architect ("Architect of Record"). A Professional Engineer licensed to practice their profession in the State of Illinois, when acting as a consultant to the Architect of Record or under a separate agreement with the owner/developer, must sign and seal his work and provide proof of professional liability insurance.

The Authority's acceptance of plans and specifications is limited to the Authority review and shall not constitute a general approval of the development. The review of the plans and specifications is solely for the benefit of the Authority and not that of any other party. Subsequent modifications to the plans and specifications after the Authority's acceptance must be approved by the Authority. Further, such acceptance shall not constitute a waiver of the Authority rights against those responsible for any error or omission or unauthorized changes.

The completed project drawings must be current ( $\leq$  *three* months old) and include the following:

### **New Construction**

#### **6.01** Complete **Civil Engineering Drawings**, including, but not limited to:

- Location map.
- Site erosion plan, site utilities plan, site grading plan and site drainage plan.
- Site parking plan, pavement details, curbs details, curb ramp details, sidewalk details, and road profiles (if applicable).
- Topographical survey.
- Flood plain information.
- Other necessary details that appear on a complete set of civil engineering drawings.

#### **6.02** Complete **Landscape Drawings** including but not limited to:

- Location of all trees, shrubs, berms, and sod/grass areas.
- Material schedules.
- Other necessary details required for a complete set of landscape drawings.

#### **6.03** Complete **Architectural Drawings**, including, but not limited to:

- *Cover sheet*, including *index*, *project data*, *location map*, *building code* and *zoning information*, table indicating unit schedule (*including accessible, adaptable and sensory impaired units*), types and sizes.
- Site plan, *including parking data and layouts*.
- Demolition Plans as applicable
- Floor plans.
- Building elevations.
- Interior *Kitchen and Bath* elevations, *as well as other interior elevations required to identify areas receiving special design consideration*.
- Wall sections.
- Stair, kitchens and bathroom details.
- Door, *hardware, windows, room finish and appliance* schedules.
- Large scale drawings of the typical apartments and common areas, *including* accessibility compliance.
- Other necessary details required for a complete set of architectural drawings.

#### **6.04** Complete **Structural Engineering Drawings** including, but not limited:

- Foundation plan, footing and pier schedules, foundation and footing sections.



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- Floor framing plans, roof framing plan, structural steel sizes and layout.
  - Column schedule, connection details.
  - Other necessary details required for a complete set of structural drawings.
  - Truss and panel shop drawings shall be submitted to the Authority prior to installation.
- 6.05** Complete **Mechanical Drawings** including, but not limited to:
- Demolition Plans as applicable
  - Duct layouts.
  - Location of the HVAC equipment including condensing units, piping layouts, if hot water heating, large scale boiler room layout.
  - Equipment schedules.
  - Other necessary details required for a complete set of mechanical drawings.
- 6.06** Complete **Plumbing Drawings**, including, but not limited to:
- Demolition Plans as applicable
  - Location and size of incoming water service, hot and cold-water distribution piping, *including insulation as required in the 2015 IECC.*
  - Storm water drainage piping, sanitary sewer piping.
  - Plumbing fixture and equipment schedules.
  - Soil waste and vent diagrams, water distribution diagrams.
  - Other necessary details required for a complete set of plumbing drawings.
- 6.07** Complete **Electrical Drawings** including, but not limited to:
- Demolition Plans as applicable
  - Location and height of all switches and outlets, *including ground-fault circuit-interrupter (GFCI) protection in the locations required by the NEC.*
  - Location of all lighting fixtures.
  - Location of all electrical panels, location and size of the incoming electric service.
  - Electric riser diagram, main distribution panel diagram, electric panel schedules.
  - Large scale floor plan of the electrical equipment room.
  - Location of all exit and emergency lighting, location of all fire alarm audio visual devices, *including all pull stations.*
  - Site lighting plan.
  - Other necessary details required for a complete set of electrical drawings.
  - .
- 6.08** Complete **Fire Protection Drawings** (if applicable). Fire protection shop drawings shall be submitted to the Authority prior to installation.
- 6.09** Verification that the drawings comply with the **2015 International Energy Conservation Code**. (REScheck, COMcheck or equal).
- 6.10** **Green Development Plan** outlining the integrated design approach used for this development.
- 6.11** Complete **Soils boring (Geotechnical) report** describing the subsurface exploration, analysis, mining hazards, including mining maps, and geotechnical recommendations for the site.
- 6.12** A **Structural Design Narrative** prepared by the “Architect of Record” or Structural Engineer indicating the structural design data used for the site, including but not limited to live loads (e.g., floor and roof live loads), ground snow load, wind load (e.g., basic wind speed, wind exposure category, etc.), earthquake load (e.g., building seismic design category, site class, etc.), flood design data (if applicable) and any prescriptive construction detailing considered.

- 6.13** For new construction projects that fall within the New Madrid Seismic Zone, a certification statement attesting to the fact that the drawings meet the seismic design requirements for earthquake resistant buildings.
- 6.14** **Project specifications and design manual** outlining the necessary material, installation and other requirements to complete the scope of work for the successful construction of the project. This information shall be presented in the most current Construction Specifications Institute (CSI) format.
- 6.15** A current ( $\leq$  six months old) **ALTA/NSPS Land Title Survey**.
- 6.16** A current ( $\leq$  twelve months old) **Phase I Environmental Site Assessment**. This assessment must include, but not be limited to, the following considerations.
- Adjoining land use and zoning.
  - Soil conditions.
  - Slope conditions as related to soil erosion, parking, walks, drives, etc.
  - Storm water drainage.
  - Noise considerations.
  - Site plan showing all major site features, buildings, roads, walks, utilities, etc.
  - Flood plain information
  - Wetland information
  - Mining information
  - Seismic information
  - *Radon information*
  - Endangered Species
  - *Vapor Intrusion information*
  - Completion of the IHDA Phase I Environmental Consultant Report Requirements. The IHDA Phase I Environmental Consultant Report Requirements may be found on the IHDA website ([www.ihda.org](http://www.ihda.org)).

### Rehabilitation and Adaptive Reuse Projects

If the project consists of any existing structures, a Property Needs Assessment (PNA) dated within 6 months of application deadline must be submitted at the time of application. The PNA will evaluate the current condition of the asset(s) and include a cost estimate for any critical, immediate and long term repairs. The IHDA PNA standards can be found on the IHDA website. ([www.ihda.org](http://www.ihda.org)). The selected *third-party* vendor can be neither the Architect of Record for the project nor the preparer of the owners/developers scope of work for the project.

*Any project including rehabilitation must contain at least a minimum hard cost budget of \$25,000 per unit for the area being updated, and include the following minimum project scope:*

- *Replacement of all unit and common area kitchen and bathroom cabinets and counter tops*
- *Replacement of all plumbing fixtures within the entire project with fixtures meeting with the fixture criteria identified in Section 14 - Energy Efficiency and Green Criteria of these standards*
- *Replacement of all light fixtures throughout the project*
- *Replacement of all flooring throughout the project*
- *Repair/Replacement of one additional major system (furnaces, water heaters, central boilers, air conditioning equipment, elevator, windows, roofing, tuckpointing of exterior masonry, etc.) throughout the entire building*

The completed project drawings must be current ( $\leq$  *three* months old) and include the following:

- 6.17** Complete **Civil Engineering Drawings**, including, but not limited to:
- Location map.

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- Site erosion plan, site utilities plan, site grading plan (if re-grading work is required), and existing site drainage plan.
  - Site parking plan, pavement details if new pavement or an overlay of the existing pavement is required), curb details (if repair or new curb work is required), curb ramp details (if new curb ramps are to be provided), sidewalk details (if new sidewalks are to be provided) and road profiles (if applicable).
  - Topographical survey,
  - Indication of the flood plain limits (if applicable).
  - Other necessary details that appear on a complete set of civil engineering drawings.
- 6.18** Complete **Landscape Drawings** including but not limited to:
- Location of all trees, shrubs, berms, and sod/grass areas.
  - Material schedules.
  - Other necessary details required for a complete set of landscape drawings.
- 6.19** Complete **Architectural Drawings**, including, but not limited:
- Cover sheet, including index, project data, location map, building code and zoning information, table indicating unit schedule (including accessible, adaptable and sensory impaired units), types and sizes.
  - Site plan, including parking data and layouts.
  - Demolition plans documenting the full scope of project demolition
  - Floor plans of the typical building or if there are various types of buildings, floor plans of each type. These plans shall be dimensioned, indicate the rehabilitation work to be performed in each type of apartment, the type of existing floor framing and the direction of the span.
  - Building elevations (front, rear, and sides) indicating the location and type of work to be performed and the heights of the various floors from grade to finish first floor and finish floor to floor heights thereafter.
  - Wall sections indicating existing wall and floor construction and any work to be performed.
  - Detail sheets including stair details (if replacing the stairs), kitchen details (if replacing cabinets), door schedules, room finish schedules, bathroom details (if renovation bathrooms), large scale drawings of the typical apartments, large scale drawings of the common areas, accessibility compliance, and all other necessary details required for a complete set of architectural drawings.
  - Any proposed modifications complying with the applicable accessibility requirements.
  - Other necessary details required for a complete set of architectural drawings.
  - Truss and panel shop drawings shall be submitted shall be submitted to the authority prior to installation. (If applicable.)
- 6.20** Complete **Structural Drawings**, if applicable to the scope of work, including, but not limited to:
- Foundation plan, footing and pier schedules, foundation and footing sections.
  - Floor framing plans, roof framing plan, structural steel sizes and layout.
  - Column and lintel schedules, connection details.
  - Other necessary details required for a complete set of structural drawings.
  - Truss and panel shop drawings shall be submitted to the Authority prior to installation.
- 6.21** Complete **Mechanical Drawings**, including, but not limited to:
- Demolition plans
  - Duct layouts (if altering the existing duct layout or installing new ducts).
  - Location of the HVAC equipment including condensing units, piping layouts (if applicable), if new hot water heating system, large scale boiler room layout.
  - Equipment schedules.
  - Roof penetration details (if applicable).

- Other necessary details required for a complete set of mechanical drawings.
- 6.22** Complete **Plumbing Drawings**, including, but not limited to:
- Location of the existing incoming water service, new hot and cold-water distribution piping (if applicable).
  - Existing storm water drainage piping (if applicable), new sanitary sewer piping (if applicable).
  - Definition of demolition scope as required for the project
  - New plumbing fixture and equipment schedules.
  - New soil waste and vent diagrams (if applicable), and new water distribution diagrams (if applicable).
  - Other necessary details required for a complete set of plumbing drawings.
- 6.23** Complete **Electrical Drawings** including, but not limited to:
- Location and height of all existing switches and outlets, *including ground-fault circuit-interrupter (GFCI) protection in the locations required by the NEC.*
  - Location of all existing lighting fixtures.
  - Location of all existing electrical panels, location of the incoming electric service, size of the incoming electric service.
  - Definition of demolition scope as required for the project
  - Electric riser diagram (if providing a new building service), main distribution panel diagram (if providing a new main panel), electric panel schedules (if applicable).
  - Large scale floor plan of the electrical equipment room (if applicable).
  - Location of all existing or new exit and emergency lighting, location of all existing or new fire alarm audio visual devices, location of all existing or new pull stations.
  - Site lighting plan.
  - Other necessary details required for a complete set of electrical drawings.
- 6.24** Complete **Fire Protection Drawings** (if applicable). Fire protection shop drawings shall be submitted to the authority prior to installation.
- 6.25** **Green Development Plan** outlining the integrated design approach used for this development.
- 6.26** For projects that fall within the New Madrid Seismic Zone, a certification statement attesting to the fact that the buildings meet the seismic design requirements for earthquake resistant buildings.
- 6.27** **Project specifications and design manual** outlining the necessary material, installation and other requirements to complete the scope of work for the successful construction of the project. This information shall be presented in the most current Construction Specifications Institute (CSI) format.
- 6.28** A current ( $\leq$  six months old) **ALTA/NSPS Land Title Survey**
- 6.29** A current ( $\leq$  twelve months old) **Phase I Environmental Site Assessment**. Please include all the assessment requirements under “New Construction” above, including applicable:
- All projects must comply with the IHDA Lead Based Paint Construction Guidelines.  
<http://www.ihda.org/developer/architectureConstructionServices.htm>
  - Asbestos considerations (HUD, IEPA and EPA 40 CFR 61.145 and Illinois Department of Public Health regulations).
- 6.30** **Mold considerations:**
- Fact Sheets from Illinois Department of Public Health:  
<http://www.idph.state.il.us/envhealth/factsheets/mold.htm>  
<http://www.idph.state.il.us/envhealth/factsheets/moisture.htm>
  - EPA Mold Site: <http://www.epa.gov/mold/>

**6.30** *On smaller projects such as a single family home, multifamily building with less than 5 units, etc., (in lieu of the above rehabilitation requirements) the Authority may accept the following: a home inspection report by a licensed state inspector, radon report, asbestos inspection, termite report, lead based paint risk assessment and Housing Quality Standards (HQS) Report unless HOME funded which may require additional documentation. The scope of work shall address all listed deficiencies. If contemplating this approach please contact Authority Staff for approval prior to conducting any work or third party reports.*

## **7) Design and Planning**

The following standards are being provided as an aid in the development and design process. These requirements represent the minimum standards as imposed by the Authority. In addition to the previously mentioned Codes and Regulations, the construction must also be consistent with recognized standards and accepted practices in the construction industry.

These standards are primarily for new construction. However, any new work done in any rehabilitation or adaptive reuse shall comply with the standards for new materials. If unsure as to which standards shall apply, consult with IHDA Architectural Services staff.

As these Projects will sustain affordable housing over the loan term, the Authority encourages the incorporation of innovation and cost effectiveness whenever possible. The Authority recommends careful consideration of the material selection for the project, as long lasting and durable materials that will minimize unnecessary maintenance and replacement are preferred.

### **7.01 Required Project Amenities:**

- Secured building features, such as security staff, cameras, alarm systems, secure common hallways and entrances, etc.
- The capability for each unit to access high-speed internet either through wireless service to all residents or hard-wire connection.
- Window treatments for each unit, such as mini blinds or curtains.
- On-site laundry facilities that will include, at a minimum, *one of the following: a.) quantities of washers and dryers in a common laundry area equal to the more stringent amount of washers and dryers required by either the most current version of local or state plumbing codes, or b.) washers and dryers installed and maintained in every unit. The provision of washer/dryer hook-ups will not fulfill the requirement for on-site laundry.*

#### **If the Project has three-bedroom units:**

- The units must contain one full bathroom and a three-quarters bathroom consisting of a toilet, sink and shower.

#### **If the Project has four or more bedroom units:**

- The units must contain at least two full bathrooms.

#### **Recreation space:**

- Elderly Projects, Supportive Housing Projects and SLF Projects, must include a furnished multipurpose or activity room sized *as indicated in Section 17 of these standards.*
- All non-elderly Projects must include a fully equipped indoor or outdoor playground or tot lot appropriately sized for the Project *unless otherwise approved by the Authority.*

## 8) Accessibility Standards

**Accessibility Codes and Acts:** One or more of the following accessibility Codes and Acts shall be applicable to any development funded by IHDA. When there is a conflict in the design requirements of the various Acts and Codes, the most stringent requirements will prevail. If unsure as to which standards shall apply, Authority Architectural Services staff should be consulted.

### 8.01 Federal Fair Housing Act:

All new construction projects of four or more dwelling units and all buildings constructed for first occupancy after March 13, 1991 are required to comply with accessibility standards and design requirements mandated by Federal Fair Housing Act and ICC/ANSI A117.1, Latest Edition.

<http://www.hud.gov/offices/fheo/disabilities/fhefhag.cfm>

### 8.02 Illinois Accessibility Code:

Housing units that are owned or financed by a governmental unit (Authority) that consist of five or more dwelling units on each project site, shall comply with all requirements of Section 400.350, Multi-Story Housing requirements Section 400.360, Requirements for Adaptable Dwelling Units of The Illinois Accessibility Code. Renovation projects must comply with Section 400.510 of the Code to determine the level of accessibility required.

[http://www.illinoisattorneygeneral.gov/rights/environmental\\_barriers.html](http://www.illinoisattorneygeneral.gov/rights/environmental_barriers.html)

### 8.03 ICC/ANSI A117.1-Latest Edition:

Projects seeking Tax Credits, either through tax-exempt bonds (4% Tax Credits) or through the competitive round (9% Tax Credits) must provide the percentage of Accessible and Sensory Impaired units as specified in the LIHTC Qualified Allocation Plan (QAP).

[http://www.ihda.org/developer/documents/2014QAP-FINALGOVAPPROVED\\_001.pdf](http://www.ihda.org/developer/documents/2014QAP-FINALGOVAPPROVED_001.pdf)

### 8.04 Section 504 of the 1973 Rehabilitation Act:

Projects that receive federal financial assistance (*HOME, National Housing Trust Fund, Risk Share, etc.*) must comply with Section 504 of the 1973 Rehabilitation Act and 1984 Uniform Federal Accessibility Standards (UFAS):

[www.access-board.gov/ufas/ufas.pdf](http://www.access-board.gov/ufas/ufas.pdf)

<http://www.hud.gov/offices/fheo/library/UFASAccessibilityChecklistforPHAs-5-7-08.pdf>

### 8.05 The Americans with Disabilities Act:

The common areas open for public use, such as a property management or rental office, shall comply with the requirements of The Americans with Disabilities Act (latest *edition*).

### 8.06 Local Codes:

Projects must comply with the adopted local building *and accessibility* code.

### Technical Requirements:

**8.06** For new constructed buildings that do not have an elevator, 100% of the total number of Ground Floor units must comply with the requirements of the *Federal* Fair Housing Act and 20% of the total number of dwelling units must comply with the Requirements for Adaptable Dwelling Units, Chapter I, §400.360 of the Illinois Accessibility Code.

**8.07** For new constructed buildings equipped with an elevator, 100% of the total number of units must comply with the requirements of the *Federal* Fair Housing Act and 20% of the total dwelling units must comply with the Requirements for Adaptable Dwelling Units, Chapter I, §400.360 of the Illinois Accessibility Code.

**8.08** New construction projects that are recipients of *Authority* financial assistance, in whole or in part, shall have a **minimum** of 10%, of the total number of units or at least one unit (whichever is greater) constructed as being fully accessible for persons with mobility impairments. A **minimum** of an additional 2% of the total

number of dwelling units or a least one unit (whichever is greater) must be suitable for occupancy by people with hearing or visual impairments. The number of hearing and visual impaired units shall not be included in the required unit count for accessible units. In projects where there is a variety of units are offered, at least one of each type of unit, including town houses, must be accessible to persons who are mobility impaired. The development must offer the same choices *of unit location* and variety of units to persons with mobility impairments as those who are not mobility impaired. This requirement will overlap some of the other required code requirements and together will satisfy all of the accessibility code requirements.

- 8.09** For rehabilitation projects, Section 400.510 of the Illinois Accessibility Code will determine the level of accessibility required. In addition, projects that receive federal financial assistance will also be required to comply with 24 CFR § 8.23, Alterations of existing housing facilities.
- 8.10** Unless technically infeasible, existing buildings where a change of occupancy occurs shall comply with the requirements for new construction mandated by the Illinois Accessibility Code and local building codes.
- 8.11** For projects renovating existing buildings, special accommodations to these standards may be allowed with approval from the Authority. Approval of conditions must be received prior to project board approval by submitting a written statement clarifying why accessible accommodations cannot be provided. Any request submitted must be based on code definitions, and adequate documentation must be provided for evaluation. A statement outlining the approval must be submitted with the final plans and specifications for plan review. Accommodations will only be granted if a development is deemed to be providing reasonable accommodation for accessible units as determined by the Authority.
- 8.12** Common use areas exclusively for tenants and their guests must meet the requirements the Illinois Accessibility Code; ICC/ANSI A117.1, latest edition; *and the American with Disabilities Act.*
- 8.13** The requirements described in Section 400.610 of the Illinois Accessibility Code will govern renovation of buildings of a historic nature and any requirements of the State of Illinois Historical Agency.
- 8.14** *For Multi-unit Single Family Home developments the committed number of fully accessible and adaptable units shall be designed to meet the minimum requirements of the codes above as defined by the selected funding source(s).*

## 9) Visitability

Visitability design criteria allow persons with disabilities, access to residential units by providing them with the opportunity to visit friends and family. It incorporates the following in all new construction, additions and alterations, and rehabilitation projects whenever practical and feasible. Visitability design criteria will be required in all single-family, townhomes, single story dwelling units and multi-story dwelling units. In multi-story elevator buildings every unit shall be visitable, in multi-family non-elevator buildings only the ground floor units shall be visitable. *Visitability shall not be used as a substitute for accessible or adaptable requirements described above.*

### Design Considerations

- 9.01** An accessible route must be provided from the point of arrival to the main entrance of each unit with a clear width of 36 inches and a running slope of not greater than 5% with a cross slope of not greater than 2%.
- 9.02** Each unit must have at least one zero-step entrance with a 36" wide entrance door. A zero-step entrance is one without a step at the entrance door and with less than ½" difference between the inside and outside surfaces, or with a threshold with less than a ½" rise. An overhang or porch roof is recommended to protect the entrance from the elements.
- 9.03** The main entrance door to each unit must be a minimum of 36 inches wide. All other doors on the main level shall be a minimum of 34 inches wide.
- 9.04** Provide an accessible powder room or a full bathroom on the main entrance floor in compliance with the requirements of Section 4.34.5 of the Uniform Federal Accessibility Code or Sections *1004.11.3.1.1 and 1004.11.3.1.2* of ICC/ANSI A117.1, latest edition.

## 10) Site Standards

- 10.01** *Proper stormwater design shall be provided for the site meeting with local jurisdictional requirements, and an approved plan shall be submitted to the Authority with the final plans and specifications prior to the start of construction. All permits must be received by the State of Illinois Environmental Protection Agency prior to closing. If no jurisdictional requirements apply (city or county), all stormwater must be managed within the project site, and be connected into a clearly identified storm sewer system (dedicated or combined).*
- 10.02** Finished grade at the exterior perimeter of the building shall be not less than 4-inches below the top of the exterior face of the foundation wall and slope away from the building at a slope of 5% for a minimum of 10- feet measured perpendicular to the wall.
- 10.03** Buildings located within the 1% flood plain shall be avoided and may not be financed. *All projects located on the flood plain shall submit proof of flood insurance. Federally-funded projects located in the flood plain are subject to the 8-step process as determined by HUD.*
- 10.04** Projects shall not be located in proximity to environmental hazards.
- 10.05** Sites that are divided by a heavily traveled major traffic artery shall be avoided and may not be financed.
- 10.06** All projects must specify method of irrigation (*automated or manual*) provided for the project for proper maintenance of planted material (*e.g. trees, shrubs, sod, seeded areas, etc.*).

### Parking Areas and Sidewalks:

- 10.07** The design of private internal roadways and sidewalks must meet the local design requirements to enable them to be acceptable to the municipality in order to qualify for future dedication to the municipality. Parking areas must be paved and graded for proper drainage as set forth in the HUD Minimum Property Standards. A link can be found at:  
[http://portal.hud.gov/hudportal/HUD?src=/program\\_offices/administration/hudclips/handbooks/hsg/4910.1](http://portal.hud.gov/hudportal/HUD?src=/program_offices/administration/hudclips/handbooks/hsg/4910.1)
- 10.08** Parking spaces shall be provided as per local zoning ordinance but in no case be less than one parking space per dwelling unit *for family housing, and 0.75 spaces per unit for senior housing* except for the following:
1. Supportive Living Facilities for the Frail Elderly (Illinois Department of Public Aid)- one (1) parking space shall be provided for each 10 units plus one (1) parking space for every two staff members and ten percent (10) of the total number of units for visitor parking or as per local ordinance, whichever is greater.
  2. Single Room Occupancy (SRO): one (1) parking space shall be provided for each 10 units or as per local ordinance, whichever is greater.
  3. Supportive Family Housing: one (1) parking space shall be provided for each 5 units or as per local ordinance, whichever is greater.
  4. *Transit Oriented Development: Reduction of parking requirement as allowed by local zoning codes meeting with distance to transit requirements.*
- 10.09** *Parking areas shall be designed to meet the minimum parking space and drive aisle requirements within the local zoning or building codes. The following minimum dimensions shall be provided if there are no local standards:*
- Double loaded 90-degree parking areas shall be a minimum width of 60-feet
  - Single loaded 90 degree parking areas shall have a minimum width of 42-feet.
  - *intermediate and access aisles shall be a minimum of 24-feet in width for two-way traffic, and 12-feet in width for one-way traffic.*
- 10.10** *A minimum number of accessible parking and accessible van parking stalls shall be provided meeting with local and state accessibility code requirements. When accessible parking spaces are provided, one space*



*in every 6, or fraction thereof, shall be van accessible.*

**Exception:** Where parking is provided for all residents, one accessible parking space shall be provided for each accessible dwelling unit. Where parking is provided for only a portion of the residents, an accessible parking space shall be provided on request of the occupant of an accessible dwelling unit.

- 10.10.1** Each accessible parking space *must be adjacent to an access aisle as allowed by the Illinois Accessibility Code, applicable federal and local codes, whichever is most restrictive*, and all access aisles shall blend to a common level with an accessible route.
- 10.10.2** In multi-family developments, when covered parking is provided a minimum of two percent (2%) of the covered parking spaces shall be accessible. If garages are provided, the minimum dimensions shall be per applicable code and the door shall be 9' wide. Covered parking shall be defined as either an indoor parking garage or an outside parking lot carport.
- 10.10.3** Accessible parking spaces and access aisles shall be designed so that cars and vans, when parked, cannot obstruct the required clear width of adjacent accessible routes. They shall not have a slope greater than 2% in all directions.
- 10.11** In single family developments with single car garages, the minimum garage dimension will be 11' wide by 20' deep with an 8' wide door.
- 10.12** Concrete curbs at all access drives and parking lots must be provided. *A single family driveway is not considered a parking lot or an access drive and therefore does not require a curb. However, any parking lot provided at public use spaces in single family developments will require a curb per this requirement. If a site is developed within an existing neighborhood where curbs are not provided for the existing roads, new roadways shall be allowed to meet existing conditions, and shall be built per local municipality requirements.*
- 10.13** Access for fire-fighting equipment must be provided in accordance with the requirements of the local authorities.
- 10.14** All sidewalks along the accessible route must be a minimum of 5-feet in width with the exception of service walks which may be 3-feet in width.

**Exceptions:**

1. A minimum 6-foot wide sidewalk is required when parking spaces abut sidewalks and the edge of the sidewalk becomes the wheel stop. If pre-cast concrete wheel stops are provided and set a minimum of 30-inches from the edge of the sidewalk to the centerline of the wheel stop, then a 5-foot wide sidewalk will be permitted.
  2. *Public sidewalks provided for multi-unit single family developments shall be designed to meet local municipality requirements for public sidewalks for neighborhoods.*
- 10.15** Refuse collection stations must be on an accessible route and screened with permanent enclosures. Paved areas adjacent to the collection stations must be designed to provide adequate bearing for heavy garbage trucks.

## **11) Building Standards**

**Foundations:**

- 11.01** The owner/developer must submit a soils report including a boring log. In projects composed of one building exceeding 2000 SF, there shall be a minimum of three borings within the building footprint and 2 borings along sidewalks and roadways. In projects with multiple buildings exceeding 2000 SF, there shall be a minimum of nine borings within the building footprints and evenly distributed throughout the project or as otherwise directed by the structural engineer. In addition for both single family and multi-family, on previously developed lots at a minimum one boring is required within the footprint of each former structure.

Borings shall extend to a minimum of 15 feet below the natural grade. For high-rise buildings at least one boring shall extend down to 100' below the natural grade or hardpan.

- 11.02** Wall and column support footings shall be constructed of cast-in-place concrete. They shall be reinforced to accommodate the design loads. Timber, steel grillage, or other material used for footings will not be permitted. Wall and column footings shall *extend to the appropriate frost depth for the site, or bear on suitable soil meeting the specified soil bearing capacity identified by the soils report.*
- 11.03** Cast-in-place concrete, precast concrete and masonry foundation walls will be permitted and shall be designed to meet the requirements of the local building code. *Steel sheet piles or helical pier foundations shall be allowed, with Authority approval, prior to board submission.* Wood foundation systems, rubble stone or any other similar materials used for foundation walls will not be permitted.
- 11.04** An under slab drainage system must be installed when the water table is 5-feet or less below the bottom of the floor slab to prevent hydrostatic pressure build-up from groundwater fluctuation.

**Exterior Walls:**

- 11.05** Exterior wall facings shall consist of 4-inch face brick, stone, concrete masonry units, aluminum siding, vinyl siding, metal lath and cement stucco, glass and aluminum curtain wall systems, prefinished steel panels, cementitious siding, treated engineered wood siding, insulated precast concrete decorative panels, wood siding or Authority approved equal.
- 11.06** Exterior *Insulation and Finish Systems (EIFS)* are permitted in limited areas as an exterior facing with the approval of the Authority *only, and shall not be allowed as a primary building facing. EIFS shall not be allowed as a finish material to be placed over the face of exterior cladding on existing buildings.*
- 11.07** Special attention shall be given to a review of the lintels and mortar joints when rehabilitating masonry structures. A detailed repair scheme must be incorporated in the plans and specifications including the clearly defined areas where lintel repair and tuckpointing work is to be performed.

**Stairs:**

- 11.08** Open risers are not permitted.
- 11.09** Outdoor stairs and their approaches shall be designed so that water will not accumulate on walking surfaces.
- 11.10** When stairs are installed along routes that are required to be accessible, there must be an alternative way to get between levels. If the alternative way is an elevator or lift, the stairs do not need to comply with Section 504 of *ICC/ANSI A117.1-Latest Version*. If the alternative way is a ramp, the stairs must comply with Section 405 of *ICC/ANSI A117.1- Latest Version*. When an accessible route consists of both a ramp and stairs, it is recommended they are located in close proximity so people who can use only one of the two (such as the ramp), need not travel an unreasonable additional distance.
- 11.11** Exterior fire escapes shall not be permitted in new construction projects but will be acceptable as a means of egress component in existing buildings only.

**12) Dwelling Unit Standards**

**12.01** The following table indicates the Authority’s minimum acceptable dwelling unit size:

Dwelling Type	Area (Inside dimensions)
Efficiency (Studio) Unit <b>not</b> including SRO Unit (see below)	300 SF (New Construction) 250 SF (Rehabilitation)
Supportive Living Facility	300 SF (for one occupant) 450 SF (for two occupants)
One Bedroom Unit	525 SF (New Construction) 500 SF (Rehabilitation)
Two Bedrooms/One Bath Unit	700 SF

Two Bedrooms/One One-Half or Two Bath Unit	750 SF
Three Bedrooms/One Three-Quarters Bath Unit	950 SF
Four Bedrooms/Two Bath Unit	1100 SF
Five Bedrooms/Two Bath Unit	1250 SF
<p>Single Room Occupancy (SRO) Unit:</p> <ol style="list-style-type: none"> <li>1. A SRO unit shall contain not more than one habitable room consisting of not less than 180 square feet and not more than 250 square feet of floor area (for one occupant) / 400 square feet of floor area (for two occupants) for new construction projects and not less than 150 square feet for rehabilitation projects, <b>excluding</b> the floor areas for bathrooms, toilet rooms, laundries, pantries, foyers, corridors, storage spaces, stairways and closets.</li> <li>2. <i>Any SRO project must include both a private bathroom including a sink, toilet and bathing facilities and a kitchen within the unit</i></li> </ol> <p><b>Exception:</b> When financial assistance also includes the Illinois Department of Healthcare and Family Services, the SRO unit shall have a minimum of 300 SF for a single occupant unit and 450 SF for a two-occupant unit. This is required for both new construction and rehabilitation projects.</p>	

- 12.02** Room Sizes: Unit living rooms (excluding Efficiency, Studio, SLF units, or combined living areas) shall contain a minimum of 150 SF (120 SF for rehabilitation) and have a minimum dimension of 10-feet in any horizontal dimension. *Units other than Efficiency or Studios must have bedrooms of at least 100 SF, not including closets, and a minimum dimension of 9-feet in any horizontal dimension.*
  - 12.03** The minimum ceiling height in all habitable rooms shall be 7-feet 6-inches. Soffits may be dropped to 7'- 0" A.F.F. if soffit area does not exceed 20% of room area.
  - 12.04** Carpet shall not be permitted as a floor finish in *laundry rooms*, kitchens, and bathrooms.
  - 12.05** Prefabricated shower and/or bathtubs units shall be specified and provided with factory installed integral reinforcing, cast into the *unit for installation of grab bars at code* compliant locations of the unit walls. When prefabricated units are installed in multi-unit apartments they must have a single layer of water resistant wall sheathing installed prior to the unit being placed *behind the unit, along with a cover layer of sheathing installed over the unit wall flange.*
- Exception:** The installation of grab bars *at all water closets, bath tubs and shower units complying with ICC/ANSI A117.1 – Latest Version* shall be required in dwelling unit bathrooms to be occupied by elderly, severely disabled people, and units required to be fully accessible.

### **13) Mechanical, Plumbing and Electrical Systems**

Penetrations of floor/ceiling assemblies and assemblies required to have a fire-resistance rating shall be protected in accordance with the 2015 edition of the applicable International Building Code, as well as: all cutting, notching, and boring in wood and steel framing.

To the greatest extent feasible, mechanical rooms shall be designed with maintenance in mind. The layout of the equipment should be accessible (i.e. the servicing of one component should not require the removal of another).

**Heating, ventilating, and air-conditioning systems:**

- 13.01** All units shall be heated and air-conditioned. Heating, ventilating, and air-conditioning systems shall be designed and installed according to the requirements of the local building code. If no building code is adopted within the jurisdiction the International Mechanical Code, 2015 edition shall apply. They shall also comply with the efficient utilization of energy in accordance with the 2015 edition of the International Energy Conservation Code. Lastly, the United States Department of Energy REScheck or COMcheck compliance verification and code requirements must be submitted to the Authority for review.

**13.02** The installation and approval of fuel gas distribution piping and equipment, fuel gas-fired appliances, and

fuel gas-fired venting systems shall be in accordance with the 2015 edition of the International Fuel Gas Code or the local building code whichever is most stringent.

### Plumbing

- 13.03** The Illinois State Plumbing Code, the local plumbing code, and these standards shall govern all plumbing work performed on new construction and new work on the renovation, rehabilitation or preservation of existing buildings. Whenever there is a conflict in the requirements between the regulations, the more stringent requirement will prevail.
- 13.04** No Project shall be served by a well or septic system.
- 13.05** All plumbing *work* shall be performed only by Illinois licensed plumbers and apprentice plumbers under the direction of a licensed plumber.
- 13.06** All equipment used for heating water or storing hot water shall be provided, at the time of installation of such equipment, with an appropriate relief valve or valves to protect against excessive or unsafe temperature and/or pressure.
- 13.07** On renovation, rehabilitation or preservation projects, replacement of the lead pipe incoming water service shall be required.
- 13.08** Water distribution piping from the water meter throughout the building shall be “Type K” for below ground piping, and “Type L” copper or PEX for above ground piping. CPVC, Polybutylene and “Type M” copper water distribution pipe shall not be permitted. PEX piping shall be allowed to be installed below floor slabs of slab-on-grade construction with the following restrictions:
- Tubing must be continuous – no fittings shall be allowed below the slab
  - Tubing must be completely buried by a suitable, easily compacted, backfill material such as sand or pea gravel
  - Tubing shall not be mounted between the slab and reinforcing
  - PEX tubing shall be protected with a non-metallic sleeve where it penetrates the slab, and may be carefully tied to vertical re-bar, wood stakes or rigid drain pipe for support to prevent movement of the pipe as the slab is installed. This sleeve must extend a minimum of 6” above or below the slab
  - The space between the PEX and the sleeve should be sealed to prevent any leakage into the building. Sealant used shall meet with manufacturer’s instructions.
  - If termiticides or pesticides are required to be applied, the exposed ends of the tubing shall be capped prior to installation of the chemicals, and installer must ensure no pooling or puddling of chemicals occurs between the sleeve and slab penetration
  - Maximum length of PEX allowed under slab is limited to a horizontal run of 10’-0”.
- 13.09** Dielectric isolation shall be provided between ferrous and non-ferrous metals. Provide dielectric unions at points of connection of copper piping to ferrous piping and equipment or fittings.

### Electrical

- 13.10** The National Electrical Code, the local electrical code, and these standards shall govern all electrical work performed on new construction and new work on the renovation, rehabilitation or preservation of existing buildings. Whenever there is a conflict in the requirements between the regulations, the more stringent requirement shall prevail.
- 13.11** The electric service to each dwelling unit shall be metered separately in all new construction projects. One central meter shall only be permitted with a letter of approval from the electric utility company.
- 13.12** The minimum electric service to a dwelling unit shall be 100-amperes. Existing electrical service may be allowed to remain for apartment unit rehabilitations. A load calculation for the proposed design should be provided to ascertain if the existing service is adequate or if it needs be increased accordingly. In no event shall the service be less than 60 amps.
- 13.13** Copper wiring is required in all branch circuits and within all units. Aluminum and aluminum clad copper wiring is ONLY allowed in feeders 60 amps or larger terminating in disconnects and electrical panels with

lugs that are rated and suitable for aluminum wiring. The line from the transformer to the meter is regulated by the National Electrical Code and/or the local utility company whichever is most stringent.

- 13.14** In existing buildings that have existing aluminum wiring, all switches and outlets rated 20-ampere or less directly connected to aluminum conductors must be marked CO/ALR.
- 13.15** Every dwelling unit in buildings serviced by natural gas shall be equipped with at least one approved carbon monoxide (CO) alarm *meeting the installation and operational requirements* of the Carbon Monoxide Alarm Detector Act (Public Act 094-0741) *and the local municipal requirements, whichever is more restrictive*. All CO alarms shall be hard wired in new construction with appropriate battery back-up. Rehabilitation project may utilize battery powered or plug in CO detectors if allowed by local Authority Having Jurisdiction
- 13.16** Every dwelling unit shall be equipped with at least one approved smoke detector *in accordance with the location and operation requirements of* the Smoke Detector Act (Public Act 425 ILCS 60/) *and local code requirements, whichever is more restrictive*.

## 14) Energy Efficiency and Green Criteria

The energy efficiency and green criteria below apply to all Authority financed projects.

### 14.01 Minimum 2015 Illinois Energy Conservation Code Design Requirements

This section outlines some of the energy code compliance requirements based upon the **prescriptive option** of the Illinois 2015 IECC for **single family and low rise residential buildings, 3 stories or less**. The full code, information on the **performance option** and the provisions for **buildings 4 stories and over** can be found at: [www.ildceo.net/energycode](http://www.ildceo.net/energycode) or [www.iccsafe.org](http://www.iccsafe.org).

A quick reference guide for the 2015 IECC can be found at: [www.reca-codes.com](http://www.reca-codes.com)

Single Family and Low Rise Residential Buildings, 3 Stories or Less										
2012 IECC: Table R402.1.1 for climate zones 4 and 5										
Climate Zone	Windows			Insulation				Foundation		
	Fenestration U-Factor	Skylight U-Factor	Glazing Fenestration Factor	Ceiling R-Value	Wood Frame Wall R-Value	Mass Wall R-Value	Floor R-Value	Basement Wall R-Value	Slab R-Value And Depth	Crawl Space Wall R-Value
Zone 5	0.32	0.55	NR	49	20 or 13 + 5	13/17	30	15/19	10, 2 ft.	15/19
Zone 4	0.35	0.55	0.40	49	20 or 13 + 5	13/17	19	10/13	10, 2ft	15/19

NR indicates No Requirements

**a. Air Sealing - Blower Door Test (IECC Section R402.4)**

The building is required to be properly sealed, tested and verified as having an air leakage rate no higher than *allowed by state amendments to the IECC*.

*IHDA shall allow all exceptions identified in Sections R503.1 or C503.1 (for defined buildings) of the IECC for renovations projects. The listed exemptions are based upon individual components. Meeting a single exemption does not exempt the remaining components, or an entire project, from testing.*

Tests shall be provided in all units of projects containing buildings with 4 units per building or less, and in each unit *configuration* type on every floor of any multi-unit apartment building containing more than 4 units.

**b. Documentation**

1. Maintenance instructions shall be furnished for equipment and systems *as applicable as defined by the IECC.*
2. A permanent certificate listing all energy efficiency material and equipment values *as required by the IECC* shall be posted on or in the electrical panel.
3. Blower door test results *shall be provided to the Authority for review prior to approval of the final closing pay out.*
4. Duct leakage test results were applicable *shall be provided to the Authority for review prior to approval of the final closing pay out*

**14.02 Additional Mandatory Design Requirements above the 2015 Illinois Energy Conservation Code**

All projects seeking funding from the Authority must comply with the following criteria. If projects are seeking 3<sup>rd</sup> party certification from Enterprise Green Communities, U.S. Green Building Councils LEED certification or ICC 700 – 2012 National Green Building Bronze Level or higher certification, the specific 3<sup>rd</sup> party certification requirements will supersede the mandatory requirement outlined below.

<b>IHDA Mandatory Requirements</b>	
<b>Requirement</b>	<b>Mandatory Section</b>
<b>Site Improvements</b>	<p>Only if providing landscaping.  <b>Landscaping:</b> Provide a tree or plant list certified by the architect or landscape architect that the selection of new trees and plants are at least 50 percent native and/or adaptive species, 100 percent appropriate to the site’s soils and microclimate and do not include invasive species. The minimum cost for the landscaping shall be 2% of the hard construction cost of the project. (Landscaping hard cost include: vegetation, hardscape, fencing, irrigation, lighting and furnishings.)</p> <p>Exception: IHDA approval will be required for the amount of landscaping provided for projects where the open land for landscaping is limited.</p>
<b>Water Conserving Fixtures</b>	<p><b>(New Construction Only):</b> Indicate on the drawings that water-conserving fixtures with the following minimum specifications will be used: toilets-1.28 GPF, urinals – 0.5 GPF, showerheads - 2.0 GPM, kitchen faucets - 2.0 GPM, bathroom faucets – 1.5 GPM</p> <p><b>(Rehab Only):</b> Install water-conserving fixtures with the following minimum specifications wherever and whenever they are replaced: toilets-1.28 GPF, urinals – 0.5 GPF, showerheads - 2.0 GPM, kitchen faucets - 2.0 GPM, bathroom faucets – 1.5 GPM</p>
<b>Energy Efficiency</b>	<p><b>Energy Star Appliances:</b> Install Energy Star clothes washers, dishwashers, <i>range hoods</i> and refrigerators.</p>
<b>Operation and Maintenance</b>	<p><b>Building Maintenance Manual:</b> Provide a manual that includes the following: a routine maintenance plan, operations and guidance for all appliances, HVAC operation, water-system turnoffs, lighting equipment, paving materials, landscaping, green cleaning products and schedule, pest control, and other systems that are part of each occupancy unit; and an occupancy turnover plan.</p>

	<p><b>Warranty Matrix</b>  <i>Provide a matrix outlining the warranty period for all items and systems covered</i></p>

**14.03 New technologies:** Projects incorporating new technologies (items such as: alternative building systems, new design components and/or materials, etc.) for the purposes of decreasing operating costs will need to be justified through the use of a cost benefit analysis. Applicable new technologies shall include any proposed efficiencies in excess of those indicated in the 2015 International Energy Conservation Code/ASHRE Standard 90.1-2010, the IHDA Green Criteria or beyond those typically employed in similar housing. New technologies shall have a payback period within 18 years. Simple payback analysis shall at a minimum be utilized, or: the initial cost of the technology (or differential cost over its equivalent) divided by the annual energy savings due to the new technology. The payback period shall be calculated using the current IHDA underwriting forecasting assumptions and shall incorporate maintenance costs, adjustments for any needed life cycle repairs and/or reserves. In any event the technology employed needs to be proven and not experimental.

## 15) Community Facilities

Community facilities such as offices, dining, mail pick-up, and other necessary functions shall be situated where they can be easily found by the residents. Most of these facilities shall be centrally located in close proximity of the primary entrance.

**15.01** Where a community room is provided it shall have a kitchen that at a minimum has a sink, range/oven, refrigerator, base and overhead storage and complies with the requirements of Section 8.00 "Accessibility Standards" of this Standard. *In municipalities requiring a commercial range hood above any community room range, the range/oven may be omitted, but a letter confirming this requirement as part of the municipal code must be provided to the Authority for review. Other than for SRO occupancies, a microwave is not a substitute for a range/oven.*

**15.02** Common-use laundry facilities, if provided, should be in accordance with the Illinois Plumbing Code and shall be on an accessible route.:

Five percent (5%) of the total automatic washing machines and clothes dryers in laundry rooms, or a minimum of one (1) each, shall be front loading.

When common-use laundry facilities are not provided on-site, automatic washers and clothes dryers **must** be provided within all the dwelling units by the owner/developer. *Utility hook ups alone are not considered compliant with this requirement, except as per Section 15.03 below.*

**15.03** When common-use laundry facilities are provided on-site to satisfy the requirements of section 15.02 above, washer and dryer hook-ups **may** be provided within individual dwelling units without the need to supply the automatic washer and clothes dryer.

**15.04** Tenant bulk storage shall be provided *within* closets in the apartment unit or in a common tenant storage room. If provided within a closet, the provided volume must be free and clear from the floor to the ceiling without any shelving. The total volume provided within all bulk storage areas shall be as follows:

Dwelling Type	Volume
Efficiency/ Single Room Occupancy SRO	32 cubic feet
1-bedroom unit	72 cubic feet



2-bedroom unit	128 cubic feet
3-bedroom unit	200 cubic feet
4-bedroom unit	288 cubic feet

**15.05** If provided, bicycle storage facilities shall be located in exterior areas with bicycle racks, and/or in a separate room in the building or in a separate storage building.

## 16) Management, Office and Maintenance Spaces

**16.01** If the size of the project warrants a separate common space for the management staff and rental office, it shall include an office large enough to accommodate a secretarial space, a waiting /reception area, at least one accessible public restroom, and a storage/coat closet. These areas must be located on an accessible route from the point of arrival and accessible to persons with disabilities. These areas may be in separate buildings, such as a clubhouse, or on the ground floor to allow for maximum site and building surveillance.

**16.02** When a separate workroom or repair shop having vehicular access is provided, it shall be appropriately sized and include storage facilities, a utility sink, toilet facilities, and work bench.

**16.03** Refuse collection and compactor rooms shall be mechanically ventilated and be in a room completely separated from the remainder of the building with walls and ceiling *meeting code defined fire separation requirements*. Where the room is serviced by a trash chute, *code required and maintenance sprinkler heads shall be provided. All openings to trash rooms shall meet code requirements in terms of fire rating and hardware requirements. A concrete slab shall directly link access from this area to the exterior pick up point. Floor drains and hose bibs shall be provided at these trash termination locations.*

**16.04** Refuse and laundry chutes shall not be used for any other purpose. The chutes shall have a fire resistive rating of not less than *what is required by the applicable building code*. An automatic sprinkler system shall be installed *as required by code*. Chutes extending three or more floors shall have additional sprinkler heads installed within the chute on alternate floors and be accessible for servicing. *Trash chute access doors shall have lever operating device and closers if not automatically actuated.*

**16.05** Retail stores and other commercial space shall not be included as part of the Authority financing, *and must be tracked on a separate contractor's sworn statement provided as part of each draw request.*

**16.06** Office facilities within the Project are substantially restricted by various rules and regulations. If office space is contemplated, it must be for the exclusive use of the tenants or for the operation of the building. The sponsor shall discuss the plans with Authority's staff at the earliest opportunity.

## 17) Recreational Facilities

**17.01** Indoor recreational facilities, if provided, shall be located within the Project and shall comply with the following **minimum** size requirements:

Dwelling Type	Area
5-100 dwelling units	600 square feet
101-300 dwelling units	800 square feet
301-500 dwelling units	1200 square feet

**17.02** Outdoor recreation facilities, if provided must be on an accessible route. Swimming pools and wading pools must meet the Minimum Sanitary Regulations for the Design and Operation of Swimming Pools and Bathing Beaches by the Department of Public Health, State of Illinois, any local Public Health Department regulations and the Americans

with Disabilities Act.

- 17.03** Play areas for younger children shall be centrally located and surrounded by dwelling units. An accessible route must be provided to the play area. The ground surface of the play area shall be stable, firm, and slip resistant. Where play components are provided, they shall be ADA approved.

## **18) Supportive Living Facilities (SLF)**

**An SLF is a residential setting in Illinois that provides or coordinates flexible personal care services, 24 hour supervision and assistance (scheduled and unscheduled), activities, and health related services with a service program and physical environment designed to minimize the need for residents to move within or from the setting to accommodate changing needs and preferences; has an organizational mission, service programs and a physical environment designed to maximize residents' dignity, autonomy, privacy and independence; and encourages family and community involvement.**

### **Building Construction:**

- 18.01** All SLF developments must be approved by the State of Illinois Department of Healthcare and Family Services. Written approval from DHFS must be provided to IHDA at the time the application is submitted. The SLF's architectural plans shall conform to Title 89, Social Services, Chapter 1: Department of Healthcare and Family Services, Subchapter d: Medical Programs, Part 146.210 Structural Requirements, An SLF's architectural plans shall conform to the current State building codes for the respective building type, local Fire and Life Safety Standards for health care occupancy or the 2000 National Fire Protection Association Life Safety Code (NFPA) 101, Chapter 32, Residential Board and Care Occupancies, National Fire Protection Association, 1 Batterymarch Park, Quincy MA 02269 (March 11, 2003, no later amendments or editions included) or local building codes if more stringent.
- 18.02** Each SLF shall meet accessibility standards as related to the Americans with Disabilities Act of 1990, the Illinois Accessibility Code, Section 504 of the Rehabilitation Act of 1973 (if applicable), the Fair Housing Act and the local building code.

## **19) Factory Built Homes**

This section Factory Built Homes refers to both manufactured and modular housing. The proposed manufacturer must have at least five-years experience in manufacturing similar housing units. In addition, the installer/general contractor must have prior experience in setting and finishing factory built housing. Factory built housing units for multi-family applications will only be allowed for up to one-story in height *unless approved by the Authority prior to having the design coordinated by the fabricator. Please contact Authority architectural staff for review of potential fabricators prior to commencing work.* Factory built housing units for single-family, detached units will be allowed for up to two-stories in height. The design, construction and installation of the Factory Built Homes must incorporate all applicable wind, live, dead, snow and seismic design loads including geotechnical characteristics based on the specific geographical site conditions.

As applicable, *all* factory built housing must comply with the requirements of Title 24, Part 3280 Manufactured Home Construction and Safety Standards, Housing and Urban Development, the Authority Standards including the following modifications. Factory built housing must also comply with the Illinois Department of Public Health requirements including: [Approved Manufacturers, Regulations for Factory Built Structures in Illinois](#), and [Guidelines for Installing Manufactured Homes in Illinois](#). The last link, "Guidelines for Installing." is only intended to be used for installations where the manufacturer's installation instructions are not available.

- 19.01** The minimum ceiling height in all habitable rooms shall be 7-feet 6-inches.
- 19.02** All exterior doors shall have a 32-inch clear width measured from the face of the door to the opposing stop when the door is open at 90-degrees and a minimum height of 80-inches.
- 19.03** All interior doors shall have a nominal 32-inch clear width measured from the face of the door to the opposing stop when the door is open at 90-degrees and a minimum height of 80-inches.

**19.04** Living rooms shall contain a minimum of 150 SF and a minimum dimension of 10-feet in any horizontal

dimension. All other habitable rooms shall have a minimum size of 100 SF not including closets and a minimum dimension of 9-feet in any horizontal dimension.

- 19.05** Hallways shall have a minimum horizontal dimension of 36 inches measured from the interior finished surface to the interior finished surface of the opposite wall.
- 19.06** Carbon monoxide detectors shall comply with the State of Illinois Carbon Monoxide Detector Act and shall be hardwired. Smoke detectors shall be hardwired with battery back-up.
- 19.07** All manufactured housing must comply with the energy conservation requirements of the International Energy Conservation Code, latest edition, and the energy conservation measures outlined in these standards.
- 13.17** Water distribution piping from the water meter throughout the building shall be "Type K" for below ground piping, and "Type L" copper or PEX for above ground piping. CPVC, Polybutylene and "Type M" copper water distribution pipe shall not be permitted. PEX piping shall be allowed to be installed below floor slabs of slab-on-grade construction with the following restrictions:
- Tubing must be continuous – no fittings shall be allowed below the slab
  - Tubing must be completely buried by a suitable, easily compacted, backfill material such as sand or pea gravel
  - Tubing shall not be mounted between the slab and reinforcing
  - PEX tubing shall be protected with a non-metallic sleeve where it penetrates the slab, and may be carefully tied to vertical re-bar, wood stakes or rigid drain pipe for support to prevent movement of the pipe as the slab is installed. This sleeve must extend a minimum of 6" above or below the slab
  - The space between the PEX and the sleeve should be sealed to prevent any leakage into the building. Sealant used shall meet with manufacturer's instructions.
  - If termiticides or pesticides are required to be applied, the exposed ends of the tubing shall be capped prior to installation of the chemicals, and installer must ensure no pooling or puddling of chemicals occurs between the sleeve and slab penetration
  - Maximum length of PEX allowed under slab is limited to a horizontal run of 10'-0".
- 19.08** All plumbing shall comply with the State of Illinois Plumbing Code and the HUD regulations, If there is a conflict, the more stringent requirement will prevail.
- 19.09** Copper wiring is required in all branch circuits and within all units. Aluminum and aluminum clad copper wiring is ONLY allowed in feeders 60 amps or larger terminating in disconnects and electrical panels with lugs that are rated and suitable for aluminum wiring. The line from the transformer to the meter is regulated by the National Electrical Code and/or the local utility company whichever is most stringent.
- 19.10** The minimum electric service to the dwelling unit shall be 100-amperes.

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## **ADDENDUMS**

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### **20) General Contractor Certification**

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#### **ADDENDUM #1**

#### **GENERAL CONTRACTOR CERTIFICATION**

The General Contractor (GC) needs to comply with the following minimum requirements and provide a written response as indicated below:

Resume of the GC's experience that demonstrates a history of having performed similar work and type required for this development (number of projects, number of units, location of projects, contract value and capacity of the involvement).

The developments proposed project manager and site superintendent each has at least 5-years' experience with multifamily residential construction/rehabilitation.

A statement identifying all *identities* of interest with the project and subcontractors/vendors for this development. Provide the names of any other construction companies in which the GC had an affiliation.

A statement indicating the GC has not failed to construct or rehabilitate a project. That the GC has never started a project which was completed by another GC. That the GC was not a party to any project where a bonding, insurance or surety company claim was instituted against the GC due to lack of performance.

A statement that the GC has no legal or creditor related concerns. Specifically indicating that the GC entity, in addition to the individual members (owners, partners, officer, etc.) do not have any pending lawsuits, pending unresolved claims and has not declared bankruptcy within the past three years.

A statement that the controlling persons (owners, partners, officer, etc.) have not been convicted, are not in custody, are not under parole or under any other non-custodial supervision resulting from conviction in a court of any jurisdiction for the commission of a felony or criminal offense of whatever degree.

A statement that the controlling person (owners, partners, officer, etc.) is not currently under indictment or has not been changed under any State or Federal laws with the crime of bribery.

A statement that the GC is not debarred from working with the Federal government.

A statement that the GC has no past projects which were cited by HUD, the local or state agency for any wage/labor compliance issues.

If applicable, evidence of the firms status as a Minority Business Enterprise (MBE) /Women Business Enterprise (WBE).

The GC is capable of obtaining either: (a) Payment and performance bond by a company approved by the Authority equal to one hundred (100%) percent of the cost of construction of the development or (b) Unconditional, irrevocable commercial letter of credit, issued by a financial institution approved by the Authority, in an amount equal to twenty-five (25%) of the cost of construction of the development.

The GC must be able to provide evidence of the following insurance coverage amounts: Commercial General Liability Insurance in the minimum amounts of \$1,000,000 for each occurrence and \$2,000,000 in the aggregate. Evidence of Automobile Liability Insurance, Statutory Worker's Compensation and Excess/Umbrella Liability Insurance in the amount of \$5,000,000. The Owner and Illinois Housing Development Authority must be listed as Additional Insured on the Liability Insurance

I, \_\_\_\_\_ am duly authorized to execute this document and as the General Contractor certify that the statements in this certification are true, correct and complete. I understand that any misrepresentation, false information, or omission may result in disqualification of this and future projects.

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Name \_\_\_\_\_ Position \_\_\_\_\_ Date \_\_\_\_\_



## 21) HOME Provisions

### ADDENDUM #2

## HOME PROVISIONS

In addition to the Standards noted above, for all projects having Authority provided HOME funding the following provisions will be applicable as per The Department of Housing and Urban Development, 24 CFR Parts 91 and 92, HOME Investment Partnerships Program: Improving Performance and Accountability; Updating Property Standards, Effective August 23, 2013.

### Article I. §92.251 Property standards.

(a) New construction projects. (1) State and local codes, ordinances, and zoning requirements. Housing that is newly constructed with HOME funds must meet all applicable State and local codes, ordinances, and zoning requirements. HOME-assisted new construction projects must meet State or local residential and building codes, as applicable or, in the absence of a State or local building code, the International Residential Code or International Building Code (as applicable to the type of housing) of the International Code Council. The housing must meet the applicable requirements upon project completion.

(2) HUD requirements. All new construction projects must also meet the requirements described in paragraphs (a)(2)(i) through (v) of this section:

(i) Accessibility. The housing must meet the accessibility requirements of 24 CFR part 8, which implements Section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 794), and Titles II and III of the Americans with Disabilities Act (42 U.S.C. 12131-12189) implemented at 28 CFR parts 35 and 36, as applicable. Covered multifamily dwellings, as defined at 24 CFR 100.201, must also meet the design and construction requirements at 24 CFR 100.205, which implements the Fair Housing Act (42 U.S.C. 3601-3619).

(ii) [Reserved]

(iii) Disaster mitigation. Where relevant, the housing must be constructed to mitigate the impact of potential disasters (e.g., earthquakes, hurricanes, flooding, and wildfires), in accordance with State and local codes, ordinances, or other State and local requirements, or such other requirements as HUD may establish.

(iv) Written cost estimates, construction contracts and construction documents. The Authority (or its sub recipient) will ensure the construction contract(s) and construction documents describe the work to be undertaken in adequate detail so that inspections can be conducted. The Authority (or its sub recipient) will review and approve written cost estimates for construction and determine that costs are reasonable.

(v) Construction progress inspections. The Authority (or its sub recipient) will conduct progress and final inspections of construction to ensure that work is done in accordance with the applicable codes, the construction contract, and construction documents.

(b) Rehabilitation projects. All rehabilitation that is performed using HOME funds must meet the requirements of this paragraph (b).

(1) Rehabilitation standards. The Authority has established rehabilitation standards for all HOME- assisted housing rehabilitation activities that set forth the requirements that the housing must meet upon project completion (Addendum #3). The Authority's (or its sub recipient) 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 rehabilitation standards must address each



of the following:

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(i) Health and safety. life-threatening deficiencies must be identified as per the UPCS inspection and if present must be addressed immediately if the housing is occupied.

(ii) Major systems. Major systems are: structural support; roofing; cladding and weatherproofing (e.g., windows, doors, siding, gutters); plumbing; electrical; and heating, ventilation, and air conditioning. For multifamily housing projects, a capital needs assessment shall be used to determine the remaining useful life of major systems. For rental housing, if the remaining useful life of one or more major system is less than the applicable period of affordability, the Authority will ensure that a replacement reserve is established either through capitalization from an eligible fund source, and/or that monthly payments are made to the reserves that are adequate to repair or replace the systems as needed. For homeownership housing, upon project completion, each of the major systems shall have a remaining useful life for a minimum of 5 years or for such longer period specified by the Authority, or the major systems must be rehabilitated or replaced as part of the rehabilitation work.

(iii) Lead-based paint. All applicable housing will meet the lead-based paint requirements at 24 CFR part 35.

(iv) Accessibility. All applicable housing will meet the accessibility requirements in 24 CFR part 8, which implements Section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 794), and Titles II and III of the Americans with Disabilities Act (42 U.S.C. 12131-12189) implemented at 28 CFR parts 35 and 36, as applicable. Covered multifamily dwellings, as defined at 24 CFR 100.201, must also meet the design and construction requirements at 24 CFR 100.205, which implements the Fair Housing Act (42 U.S.C. 3601-3619). Rehabilitation may include improvements that are not required by regulation or statute that permit use by a person with disabilities.

(v) [Reserved]

(vi) Disaster mitigation. Where relevant, the housing to be improved will mitigate the impact of potential disasters (e.g., earthquake, hurricanes, flooding, and wildfires) in accordance with State and local codes, ordinances, and requirements.

(vii) State and local codes, ordinances, and zoning requirements. The rehabilitated portion of the housing shall meet all applicable State and local codes, ordinances, and requirements or, in the absence of a State or local building code, the International Existing Building Code of the International Code Council.

(viii) Uniform Physical Condition Standards. Upon completion, the HOME-assisted project and units will be decent, safe, sanitary, and in good repair as described in 24 CFR 5.703. HUD will establish the minimum deficiencies that must be corrected based on inspectable items and inspected areas from HUD-prescribed physical inspection procedures (Uniform Physical Conditions Standards) pursuant to 24 CFR 5.705.

(ix) Capital Needs Assessments. For multifamily rental housing projects of 26 or more total units, the Authority will determine all work that will be performed in the rehabilitation of the housing and the long-term physical needs of the project through a capital needs assessment (a.k.a. physical needs assessment) of the project.

(2) Construction documents and cost estimates. The Authority (or its sub recipient) will ensure that the work to be undertaken will meet the rehabilitation standards. The construction documents (i.e., written scope of work to be performed) must be in sufficient detail to establish the basis for a uniform inspection of the housing to determine compliance with the standards. The Authority (or its sub recipient) will review and approve a written cost estimate for rehabilitation after determining that costs are reasonable.

(3) Frequency of inspections. The Authority (its sub recipients or third parties) will conduct an initial property inspection to identify the deficiencies that must be addressed including progress and final inspections to determine that work was done in accordance with work write-ups.

## FINAL STATE OF ILLINOIS 2019 ACTION PLAN - PENDING HUD APPROVAL

(c) Acquisition of standard housing. (1) Existing housing that is acquired with HOME assistance for rental housing, and that was newly constructed or rehabilitated less than 12 months before the date of commitment of HOME funds, must meet the property standards of paragraph (a) or paragraph (b) of this section, as applicable, of this section for new construction and rehabilitation projects. The Authority (or its sub recipient) must document this compliance based upon a review of approved building plans and Certificates of Occupancy, and an inspection that is conducted no earlier than 90 days before the commitment of HOME assistance.

(2) All other existing housing that is acquired with HOME assistance for rental housing must meet the rehabilitation property standards requirements of paragraph (b) of this section. The participating jurisdiction (or its sub recipient) must document this compliance based upon an inspection that is conducted no earlier than 90 days before the commitment of HOME assistance. If the property does not meet these standards, HOME funds cannot be used to acquire the property unless it is rehabilitated to meet the standards of paragraph (b) of this section.

(3) Existing housing that is acquired for homeownership (e.g., down payment assistance) must be decent, safe, sanitary, and in good repair. The participating jurisdiction (or its sub recipient) must establish standards to determine that the housing is decent, safe, sanitary, and in good repair. At minimum, the standards must provide that the housing meets all applicable State and local housing quality standards and code requirements and the housing does not contain the specific deficiencies proscribed by HUD based on the applicable inspectable items and inspected areas in HUD-prescribed physical inspection procedures (Uniform Physical Condition Standards) issued pursuant to 24 CFR 5.705. The participating jurisdiction (or its sub recipient) must inspect the housing and document this compliance based upon an inspection that is conducted no earlier than 90 days before the commitment of HOME assistance. If the housing does not meet these standards, the housing must be rehabilitated to meet the standards of this paragraph (c) (3) or it cannot be acquired with HOME funds.

(d) Occupied housing by tenants receiving HOME tenant-based rental assistance. All housing occupied by tenants receiving HOME tenant-based rental assistance must meet the standards in 24 CFR 982.401, or the successor requirements as established by HUD.

(e) Manufactured housing. Construction of all manufactured housing including manufactured housing that replaces an existing substandard unit under the definition of "reconstruction" must meet the Manufactured Home Construction and Safety Standards codified at 24 CFR part 3280. These standards preempt State and local codes which are not identical to the federal standards for the new construction of manufactured housing. Participating jurisdictions providing HOME funds to assist manufactured housing units must comply with applicable State and local laws or codes. In the absence of such laws or codes, the installation must comply with the manufacturer's written instructions for installation of manufactured housing units. All new manufactured housing and all manufactured housing that replaces an existing substandard unit under the definition of "reconstruction" must be on a permanent foundation that meets the requirements for foundation systems as set forth in 24 CFR 203.43f(c)(i). All new manufactured housing and all manufactured housing that replaces an existing substandard unit under the definition of "reconstruction" must, at the time of project completion, be connected to permanent utility hook-ups and be located on land that is owned by the manufactured housing unit owner or land for which the manufactured housing owner has a lease for a period at least equal to the applicable period of affordability. In HOME-funded rehabilitation of existing manufactured housing the foundation and anchoring must meet all applicable State and local codes, ordinances, and requirements or in the absence of local or state codes, the Model Manufactured Home Installation Standards at 24 CFR part 3285. Manufactured housing that is rehabilitated using HOME funds must meet the property standards requirements in paragraph (b) of this section, as applicable. The Authority (or its sub recipient) will document this compliance in accordance with inspection procedures that the participating jurisdiction has established pursuant to §92.251, as applicable.

### **Article II. §92.352 Environmental review.**

(a) General. The environmental effects of each activity carried out with HOME funds must be assessed in accordance with the provisions of the National Environmental Policy Act of 1969 (NEPA) (42 U.S.C. 4321) and the related authorities listed in HUD's implementing regulations at 24 CFR parts 50 and 58. The applicability of the

provisions of 24 CFR part 50 or part 58 is based on the HOME project (new construction, rehabilitation, acquisition) or activity (tenant-based rental assistance) as a whole, not on the type of the cost paid with HOME funds.

(b) Responsibility for review. (1) The jurisdiction (e.g., the participating jurisdiction or State recipient) or insular area must assume responsibility for environmental review, decision making, and action for each activity that it carries out with HOME funds, in accordance with the requirements imposed on a recipient under 24 CFR part 58. No funds may be committed to a HOME activity or project before the completion of the environmental review and approval of the request for release of funds and related certification, except as authorized by 24 CFR part 58.

(2) A State participating jurisdiction must also assume responsibility for approval of requests for release of HOME funds submitted by State recipients.

(3) HUD will perform the environmental review, in accordance with 24 CFR part 50, for a competitively awarded application for HOME funds submitted to HUD by an entity that is not a jurisdiction.

[61 FR 48750, Sept. 16, 1996, as amended at 78 FR 44678, July 24, 2013]

### **Article III. §92.354 Labor.**

(1) Every contract for the construction (rehabilitation or new construction) of housing that includes 12 or more units assisted with HOME funds must contain a provision requiring the payment of not less than the wages prevailing in the locality, as predetermined by the Secretary of Labor pursuant to the Davis-Bacon Act (40 U.S.C. 3141), to all laborers and mechanics employed in the development of any part of the housing. Such contracts must also be subject to the overtime provisions, as applicable, of the Contract Work Hours and Safety Standards Act (40 U.S.C. 3701).

(2) The contract for construction must contain these wage provisions if HOME funds are used for any project costs in §92.206, including construction or nonconstruction costs, of housing with 12 or more HOME- assisted units. When HOME funds are only used to assist homebuyers to acquire single-family housing, and not for any other project costs, the wage provisions apply to the construction of the housing if there is a written agreement with the owner or developer of the housing that HOME funds will be used to assist homebuyers to buy the housing and the construction contract covers 12 or more housing units to be purchased with HOME assistance. The wage provisions apply to any construction contract that includes a total of 12 or more HOME-assisted units, whether one or more than one project is covered by the construction contract. Once they are determined to be applicable, the wage provisions must be contained in the construction contract so as to cover all laborers and mechanics employed in the development of the entire project, including portions other than the assisted units. Arranging multiple construction contracts within a single project for the purpose of avoiding the wage provisions is not permitted.

(3) Participating jurisdictions (or their sub recipients), contractors, subcontractors, and other participants must comply with regulations issued under these acts and with other Federal laws and regulations pertaining to labor standards, as applicable. Participating jurisdictions (or their sub recipients) shall be responsible for ensuring compliance by contractors and subcontractors with labor standards described in this section. In accordance with procedures specified by HUD, participating jurisdictions shall:

(i) Ensure that bid and contract documents contain required labor standards provisions and the appropriate Department of Labor wage determinations;

(ii) Conduct on-site inspections and employee interviews;

(iii) Collect and review certified weekly payroll reports;

(iv) Correct all labor standards violations promptly;

(v) Maintain documentation of administrative and enforcement activities; and

(vi) Require certification as to compliance with the provisions of this section before making any payment under such contracts.

(b) Volunteers. The prevailing wage provisions of paragraph (a) of this section do not apply to an individual who receives no compensation or is paid expenses, reasonable benefits, or a nominal fee to perform the services for which the individual volunteered and who is not otherwise employed at any time in the construction work. See 24 CFR part 70.

(c) Sweat equity. The prevailing wage provisions of paragraph (a) of this section do not apply to members of an eligible family who provide labor in exchange for acquisition of a property for homeownership or provide labor in lieu of, or as a supplement to, rent payments.

[61 FR 48750, Sept. 16, 1996, as amended at 78 FR 44678, July 24, 2013]

**Article IV. §92.355 Lead-based paint.**

Housing assisted with HOME funds is subject to the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. 4821-4846), the Residential Lead-Based Paint Hazard Reduction Act of 1992 (42 U.S.C. 4851-4856), and implementing regulations at part 35, subparts A, B, J, K, M and R of this title.

[64 FR 50224, Sept. 15, 1999]



## **22) HOME Rehabilitation Standards**

### **ADDENDUM #3**

#### **HOME REHABILITATION STANDARDS**

In addition to the current Authority's "Standards for Architectural Planning and Construction" and the "HOME Rehabilitation and Construction Guidelines" the following Rehabilitation Standards (Standards) shall be included when financed with Authority provided HOME funds. These Standards shall include the "Property Standards" as noted above to be part of the Rehabilitation Standards, additional clarification is provided below:

These Standards are hereby incorporated into the scope of work, the sub-recipient, owner, general contractor and Architect shall ensure compliance with the applicable HOME provisions as noted. The Standards represent the minimum acceptable levels for construction completed through the rehabilitation and is the basis for a uniform inspection of the rehabilitated housing.

The project shall obtain a HUD Uniform Physical Condition Standards (UPCS) inspection (using the most current format) which shall identify all Observable Deficiencies and Health and Safety Concerns. The scope of work shall address all noted deficiencies and life threatening concerns so that at the completion of the rehabilitation the noted deficiencies and concerns have been cured.

Please visit the HUD Real Estate Assessment Center for information and documents to complete the UPCS inspections. HUD can be accessed at the following underlined hyperlinks: [HUD Physical Inspection Training Materials and Documents](#) and [Physical Inspection Training Materials](#) the [UPCS Comprehensive Listing Inspectable Area](#) form is available in Excel. In addition, the HOME Project Checklist (Addendum #4) is recommended to insure all applicable items are addressed.

If any Health and Safety Concern is identified as a Life Threatening Concern it needs to be addressed immediately. Life threatening deficiencies such as the potential for electrical shock, structural failure, carbon monoxide poisoning or noxious fumes, fire safety concerns, etc. needs to be addressed immediately if housing is occupied.

Major Systems (as noted above) must be inspected to determine the condition and if it warrants replacement or repair. The Life Expectancy of Housing Components (Addendum #5) provides estimates of the effective life of the various building components. In the event where a Major System component is in satisfactory condition but has a remaining contributory life of less than the affordability period for multifamily/rental projects, or 5 years or less for single family units

In this instance these items need to be completed in the scope of work or if for rental housing an appropriately determined replacement reserve needs to be funded so as to address the repair or replacement of the component when it becomes due. The determination of the reserve amounts will be ascertained on a case by case basis and by using the following formula.

Cost of repair at time of replacement ÷ Remaining useful life estimate (years) of component = Annual reserve amount.

In the event the project does not include approved building plans and specifications, the scope shall provide adequate description of the materials including quantity and cost. All materials shall be new and free from defect. They shall be at a minimum "construction" or "builder" grade quality. The materials shall be installed as per the manufacturer, applicable code or trade standard. Specific methods, techniques or sequential procedures shall be included when required. Descriptions should also contain manufacturer cut sheets when available. Materials and methods should be in adequate detail so there is no confusion between owner and general contractor, that the

Authority or sub recipient inspector know exactly what is being constructed and to eliminate the need for change orders due to lack of specification.



## 23) HOME Project Checklist

### ADDENDUM #4

## HOME PROJECT CHECKLIST

### New Construction

- Project meets State and local codes, ordinances, and zoning requirements
- Accessibility
- Disaster mitigation
- Written cost estimates, construction contracts and construction documents
- Construction progress inspections

### Rehabilitation

- Rehabilitation standards
- Health and safety
- Major systems
- Lead-based paint
- Inspections
- Accessibility
- Disaster mitigation
- State and local codes, ordinances, and zoning requirements
- Uniform Physical Condition Standards
- Construction documents and cost estimates
- Frequency of inspections
- Acquisition of standard housing

### Misc

- Occupied housing by tenants receiving HOME tenant-based rental assistance
- Manufactured housing
- 90 day inspection before HOME commitment or no less than 30 days for newly constructed/rehabilitated

### Environmental Review

- General
- Responsibility for review

### Labor

- General- Davis Bacon for 12 or more HOME assisted units in contract (IHDA Construction Rider)
- Volunteers
- Sweat equity

### Lead-Based Paint

- Compliance with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. 4821-4846), the Residential Lead-Based Paint Hazard Reduction Act of 1992.





## 24) Life Expectancy of Housing Components

### ADDENDUM #5

#### LIFE EXPECTANCY OF HOUSING COMPONENTS

Life in Years

##### Appliances

Compactors 10, Dishwashers 10, Dryers 14,  
Disposal 10, Freezers, compact 12, Freezers,  
standard 16, Microwave ovens 11, Electric  
ranges 17,,Gas ranges 19, Gas ovens 14,  
Refrigerators, compact 14, Refrigerators,  
standard 17, Washers, automatic and compact  
13, Exhaust fans 20

Wood/butcher block 20+  
Granite 20+  
Solid Surface 20+

##### Bathrooms

Cast iron bathtubs 50  
Fiberglass bathtub and showers 10–15,  
Shower doors, average quality 25,  
Toilets 50

##### Doors

Screen 25–50  
Interior, hollow core Less than 30  
Interior, solid core 30-lifetime  
Exterior, protected overhang 80–100  
Exterior, unprotected and exposed 25–30  
Folding 5  
Garage doors 20–50  
Garage door opener 10

##### Cabinetry

Kitchen cabinets 15–20  
Medicine cabinets and bath vanities 20

##### Electrical

Copper wiring, copper plated, 100+copper clad  
aluminum, and bare copper  
Armored cable (BX) Lifetime  
Conduit Lifetime

##### Closet Systems

Closet shelves Lifetime

##### Countertops

Laminate 10–15  
Ceramic tile, high-grade installation Lifetime  
Quartz Lifetime

##### Finishes Used for Waterproofing

Paint, plaster, and stucco 3–5 Sealer,  
silicone, and waxes 1–5



## Floors

Oak or pine Lifetime  
Slate flagstone Lifetime  
Vinyl sheet or tile 20–30  
Terrazzo Lifetime  
Carpeting 11 (depends on installation, amount of traffic, and quality of carpet)  
Marble Lifetime (depends on installation, thickness of marble, and amount of traffic)

## Footings and Foundation

Poured footings and foundations 200  
Concrete block 100  
Waterproofing, bituminous coating 10  
Termite proofing (may have shorter life in damp climates)

## Heating Ventilation and Air Conditioning

Central air conditioning unit 15 (newer units should last longer)  
Window unit 10  
Air conditioner compressor 15  
Humidifier 8  
Electric water heater 14  
Gas water heater (depends on type 11–13 of water heater lining and quality of water)  
Forced air furnaces, heat pump 15  
Rooftop air conditioners 15  
Boilers, hot water or steam 30 (depends on quality of water)  
Furnaces, gas- or oil-fired 18  
Unit heaters, gas or electric 13  
Radiant heaters, electric 10  
Radiant heaters, hot water or steam 25  
Baseboard systems 20

Diffusers, grilles, and registers 27  
Induction and fan coil units 20  
Dampers 20  
Centrifugal fans 25  
Axial fans 20  
Ventilating roof-mounted fans 20

## Home Security

Intrusion systems 14 Smoke detectors  
12 Smoke/fire/intrusion systems 10

## Insulation

For foundations, roofs, ceilings, walls, Lifetime and floors

## Landscaping

Wooden decks 15  
Brick and concrete patios 24  
Tennis courts 10  
Concrete walks 24  
Gravel walks 4  
Asphalt driveways 10  
Swimming pools 18  
Sprinkler systems 12  
Fences 12

## Masonry

Chimney, fireplace, and brick veneer Lifetime  
Brick and stone walls 100+  
Stucco Lifetime

## Millwork

Stairs, trim 50–100 Disappearing stairs 30

## Paints and Stains



Exterior paint on wood, brick, and 7–10  
aluminum

Interior wall paint (depends on 5–10 the  
acrylic content)

Interior trim and door paint 5–10

Wallpaper 7

## Plumbing

Waste piping, cast iron 75–100

Sinks, enamel steel 5–10

Sinks, enamel cast iron 25–30

Sinks, china 25–30

Faucets, low quality 13–15

Faucets, high quality 15–20

## Roofing

Asphalt and wood shingles and shakes 15–30

Tile (depends on quality of tile and climate) 50

Slate (depends on grade) 50–100

Sheet metal (depends on gauge of 20–  
50+metal and quality of fastening and  
application)

Built-up roofing, asphalt 12–25

Built-up roofing, coal and tar 12–30

Asphalt composition shingle 15–30

Asphalt overlay 25–35

## Rough Structure

Basement floor systems Lifetime

Framing, exterior and interior walls Lifetime

## Shutters

Wood, interior Lifetime

Wood, exterior 5 (depends on weather  
conditions)

Vinyl plastic, exterior 7–8

Aluminum, interior 35–50

Aluminum, exterior 3–5

## Siding

Gutters and downspouts 30

Siding, wood (depends on maintenance) 10–  
100, steel 50–Lifetime

Siding, aluminum 20–50

Siding, vinyl 50

## Walls and Wall Treatments

Drywall and plaster 30–70

Ceramic tile, high grade installation Lifetime

## Windows

Window glazing 20

Wood casement 20–50

Aluminum and vinyl casement 20–30

Screen 25–50



## 25) NHTF Provisions

### ADDENDUM #6

## NATIONAL HOUSING TRUST FUND PROVISIONS

*In addition to the Standards noted above, for all projects having Authority provided HTF funding the following provisions will be applicable as per The Department of Housing and Urban Development, 24 CFR Part 93, Housing Trust Fund, Subpart G: Project Requirements; Effective September 1, 2016. In addition, it shall be required all General Contractors for HTF funded projects submit the certification form provided in Addendum #1 of the Authority's Standards for Planning and Construction.*

### **Article V. §92.251 Property standards.**

*(a) New construction projects. (1) State and local codes, ordinances, and zoning requirements. Housing that is newly constructed with HTF funds must meet all applicable State and local codes, ordinances, and zoning requirements. HTF-assisted new construction projects must meet State or local residential and building codes, as applicable or, in the absence of a State or local building code, the International Residential Code or International Building Code (as applicable to the type of housing) of the International Code Council. The housing must meet the applicable requirements upon project completion.*

*(2) HUD requirements. All new construction projects must also meet the requirements described in paragraphs (a)(2)(i) through (v) of this section:*

*(i) Accessibility. The housing must meet the accessibility requirements of 24 CFR part 8, which implements section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 794), and Titles II and III of the Americans with Disabilities Act (42 U.S.C. 12131-12189) implemented at 28 CFR parts 35 and 36, as applicable. "Covered multifamily dwellings," as defined at 24 CFR 100.201, must also meet the design and construction requirements at 24 CFR 100.205, which implements the Fair Housing Act (42 U.S.C. 3601-3619).*

*(ii) Energy efficiency. The housing must meet the energy efficiency standards established pursuant to section 109 of the Cranston-Gonzalez National Affordable Housing Act (42 U.S.C. 12709).*

*(iii) Disaster mitigation. Where relevant, the housing must be constructed to mitigate the impact of potential disasters (e.g., earthquakes, hurricanes, flooding, and wildfires), in accordance with State and local codes, ordinances, or other State and local requirements, or such other requirements as HUD may establish.*

*(iv) Written cost estimates, construction contracts and construction documents. The Authority (or its sub recipient) will ensure the construction contract(s) and construction documents describe the work to be undertaken in adequate detail so that inspections can be conducted. The Authority (or its sub recipient) will review and approve written cost estimates for construction and determine that costs are reasonable.*

*(v) Construction progress inspections. The Authority (or its sub recipient) will conduct progress and final inspections of construction to ensure that work is done in accordance with the applicable codes, the construction contract, and construction documents.*

*(b) Rehabilitation projects. All rehabilitation that is performed using HTF funds must meet the requirements of this paragraph (b).*



*(1) Rehabilitation standards. The Authority has established rehabilitation standards for all HTF- assisted housing rehabilitation activities that set forth the requirements that the housing must meet upon project completion (Addendum #7). The Authority's (or its sub recipient) 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 rehabilitation standards must address each of the following:*

*(i) Health and safety. life-threatening deficiencies must be identified as per the UPCS inspection and if present must be addressed immediately if the housing is occupied.*

*(ii) Major systems. Major systems are: structural support; roofing; cladding and weatherproofing (e.g., windows, doors, siding, gutters); plumbing; electrical; and heating, ventilation, and air conditioning. For rental housing, an estimate (based on age and condition) of the remaining useful life of these systems, upon project completion of each major system must be provided. For multifamily housing projects of 26 units or more, a capital needs assessment of the project must be completed to determine the useful life of major systems. For rental housing, if the remaining useful life of one or more major system is less than the applicable period of affordability, a replacement reserve must be established and monthly payments must be made to the reserve that are adequate to repair or replace the systems as needed. For homeownership housing, upon project completion, each of the major systems to have a remaining useful life for a minimum of 5 years or for such longer period specified in the CNA, or the major systems must be rehabilitated or replaced as part of the rehabilitation work.*

*(iii) Lead-based paint. All applicable housing will meet the lead-based paint requirements at 24 CFR part 35.*

*(iv) Accessibility. All applicable housing will meet the accessibility requirements in 24 CFR part 8, which implements Section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 794), and Titles II and III of the Americans with Disabilities Act (42 U.S.C. 12131-12189) implemented at 28 CFR parts 35 and 36, as applicable. Covered multifamily dwellings, as defined at 24 CFR 100.201, must also meet the design and construction requirements at 24 CFR 100.205, which implements the Fair Housing Act (42 U.S.C. 3601- 3619). Rehabilitation may include improvements that are not required by regulation or statute that permit use by a person with disabilities.*

*(v) [Reserved]*

*(vi) Disaster mitigation. Where relevant, the housing to be improved must mitigate the impact of potential disasters (e.g., earthquake, hurricanes, flooding, and wildfires) in accordance with State and local codes, ordinances, and requirements, or such other requirements as HUD may establish.*

*(vii) State and local codes, ordinances, and zoning requirements. The rehabilitated portion of the housing shall meet all applicable State and local codes, ordinances, and requirements or, in the absence of a State or local building code, the International Existing Building Code of the International Code Council.*

*(viii) Uniform Physical Condition Standards. Upon completion, the HTF-assisted project and units will be decent, safe, sanitary, and in good repair as described in 24 CFR 5.703. HUD will establish the minimum deficiencies that must be corrected based on inspectable items and inspected areas from HUD-prescribed physical inspection procedures (Uniform Physical Conditions Standards) pursuant to 24 CFR 5.705.*



*(ix) Capital Needs Assessments. For multifamily rental housing projects of 26 or more total units, the Authority will determine all work that will be performed in the rehabilitation of the housing and the long-term physical needs of the project through a capital needs assessment (a.k.a. physical needs assessment) of the project.*

*(2) Construction documents and cost estimates. The Authority (or its sub recipient) will ensure that the work to be undertaken will meet the rehabilitation standards. The construction documents (i.e., written scope of work to be performed) must be in sufficient detail to establish the basis for a uniform inspection of the housing to determine compliance with the standards. The Authority (or its sub recipient) will review and approve a written cost estimate for rehabilitation after determining that costs are reasonable.*

*(3) Frequency of inspections. The Authority (its sub recipients or third parties) will conduct an initial property inspection to identify the deficiencies that must be addressed including progress and final inspections to determine that work was done in accordance with work write-ups.*

*(c) Acquisition of standard housing. (1) Existing housing that is acquired with HTF assistance for rental housing, and that was newly constructed or rehabilitated less than 12 months before the date of commitment of HTF funds, must meet the property standards of paragraph (a) or paragraph (b) of this section, as applicable, of this section for new construction and rehabilitation projects. The Authority (or its sub recipient) must document this compliance based upon a review of approved building plans and Certificates of Occupancy, and an inspection that is conducted no earlier than 90 days before the commitment of HTF assistance.*

*(2) All other existing housing that is acquired with HTF assistance for rental housing must meet the rehabilitation property standards requirements of paragraph (b) of this section. The Authority (or its sub recipient) must document this compliance based upon an inspection that is conducted no earlier than 90 days before the commitment of HTF assistance. If the property does not meet these standards, HTF funds cannot be used to acquire the property unless it is rehabilitated to meet the standards of paragraph (b) of this section.*

*(3) Existing housing that is acquired for HTF ownership (e.g., downpayment assistance) must be decent, safe, sanitary, and in good repair. The participating jurisdiction (or its sub recipient) must establish standards to determine that the housing is decent, safe, sanitary, and in good repair. At minimum, the standards must provide that the housing meets all applicable State and local housing quality standards and code requirements and the housing does not contain the specific deficiencies proscribed by HUD based on the applicable inspectable items and inspected areas in HUD-prescribed physical inspection procedures (Uniform Physical Condition Standards) issued pursuant to 24 CFR 5.705. The participating jurisdiction (or its sub recipient) must inspect the housing and document this compliance based upon an inspection that is conducted no earlier than 90 days before the commitment of HTF assistance. If the housing does not meet these standards, the housing must be rehabilitated to meet the standards of this paragraph (c) (3) or it cannot be acquired with HTF funds.*

*(d) Manufactured housing. Construction of all manufactured housing including manufactured housing that replaces an existing substandard unit under the definition of "reconstruction" must meet the Manufactured HTF Construction and Safety Standards codified at 24 CFR part 3280. These standards preempt State and local codes which are not identical to the federal standards for the new construction of manufactured housing. Participating jurisdictions providing HTF funds to assist manufactured housing units must comply with applicable State and local laws or codes. In the absence of such laws or codes, the installation must comply with the manufacturer's written instructions for installation of manufactured housing units. All new manufactured housing and all manufactured housing that replaces an existing substandard unit under the definition of "reconstruction" must be on a permanent foundation that meets*



*the requirements for foundation systems as set forth in 24 CFR 203.43f(c)(i). All new manufactured housing and all manufactured housing that replaces an existing substandard unit under the definition of “reconstruction” must, at the time of project completion, be connected to permanent utility hook-ups and be located on land that is owned by the manufactured housing unit owner or land for which the manufactured housing owner has a lease for a period at least equal to the applicable period of affordability. In HTF-funded rehabilitation of existing manufactured housing the foundation and anchoring must meet all applicable State and local codes, ordinances, and requirements or in the absence of local or state codes, the Model Manufactured HTF Installation Standards at 24 CFR part 3285. Manufactured housing that is rehabilitated using HTF funds must meet the property standards requirements in paragraph (b) of this section, as applicable. The Authority (or its sub recipient) will document this compliance in accordance with inspection procedures that the participating jurisdiction has established pursuant to §92.251, as applicable.*

**Article VI. §92.352 Environmental review.**

*(a) General. The environmental effects of each activity carried out with HTF funds must be assessed in accordance with the provisions of the National Environmental Policy Act of 1969 (NEPA)(42 U.S.C. 4321) and the related authorities listed in HUD’s implementing regulations at 24 CFR parts 50 and*

*58. The applicability of the provisions of 24 CFR part 50 or part 58 is based on the HTF project (new construction, rehabilitation, acquisition) or activity (tenant-based rental assistance) as a whole, not on the type of the cost paid with HTF funds, and will be reviewed to be in compliance with CPD Notice 16-14 initially issued on 8-8-2016, and all subsequent amendments.*

*(b) Responsibility for review. (1) The jurisdiction (e.g., the participating jurisdiction or State recipient) or insular area must assume responsibility for environmental review, decision making, and action for each activity that it carries out with HTF funds, in accordance with the requirements imposed on a recipient under 24 CFR part 58. No funds may be committed to a HTF activity or project before the completion of the environmental review and approval of the request for release of funds and related certification, except as authorized by 24 CFR part 58.*

*(2) A State participating jurisdiction must also assume responsibility for approval of requests for release of HTF funds submitted by State recipients.*

*(3) HUD will perform the environmental review, in accordance with 24 CFR part 50, for a competitively awarded application for HTF funds submitted to HUD by an entity that is not a jurisdiction.*

*[61 FR 48750, Sept. 16, 1996, as amended at 78 FR 44678, July 24, 2013]*

**Article VII. §92.354 Labor.**

*(1) Every contract for the construction (rehabilitation or new construction) of housing that includes 12 or more units assisted with HTF funds must contain a provision requiring the payment of not less than the wages prevailing in the locality, as predetermined by the Secretary of Labor pursuant to the Davis-Bacon Act (40 U.S.C. 3141), to all laborers and mechanics employed in the development of any part of the housing. Such contracts must also be subject to the overtime provisions, as applicable, of the Contract Work Hours and Safety Standards Act (40 U.S.C. 3701).*



Illinois Housing <http://www.ihda.org>  
Development  
Authority

*(2) The contract for construction must contain these wage provisions if HTF funds are used for any project costs in §92.206, including construction or nonconstruction costs, of housing with 12 or more HTF-assisted units. When HTF funds are only used to assist HTF buyers to acquire single-family housing, and not for any other project costs, the wage provisions apply to the construction of the housing if there is a written agreement with the owner or developer of the housing that HTF funds will be used to assist HTF*





buyers to buy the housing and the construction contract covers 12 or more housing units to be purchased with HTF assistance. The wage provisions apply to any construction contract that includes a total of 12 or more HTF-assisted units, whether one or more than one project is covered by the construction contract. Once they are determined to be applicable, the wage provisions must be contained in the construction contract so as to cover all laborers and mechanics employed in the development of the entire project, including portions other than the assisted units. Arranging multiple construction contracts within a single project for the purpose of avoiding the wage provisions is not permitted.

(3) Participating jurisdictions (or their sub recipients), contractors, subcontractors, and other participants must comply with regulations issued under these acts and with other Federal laws and regulations pertaining to labor standards, as applicable. Participating jurisdictions (or their sub recipients) shall be responsible for ensuring compliance by contractors and subcontractors with labor standards described in this section. In accordance with procedures specified by HUD, participating jurisdictions shall:

(i) Ensure that bid and contract documents contain required labor standards provisions and the appropriate Department of Labor wage determinations;

(ii) Conduct on-site inspections and employee interviews;

(iii) Collect and review certified weekly payroll reports;

(iv) Correct all labor standards violations promptly;

(v) Maintain documentation of administrative and enforcement activities; and

(vi) Require certification as to compliance with the provisions of this section before making any payment under such contracts.

(b) *Volunteers.* The prevailing wage provisions of paragraph (a) of this section do not apply to an individual who receives no compensation or is paid expenses, reasonable benefits, or a nominal fee to perform the services for which the individual volunteered and who is not otherwise employed at any time in the construction work. See 24 CFR part 70.

(c) *Sweat equity.* The prevailing wage provisions of paragraph (a) of this section do not apply to members of an eligible family who provide labor in exchange for acquisition of a property for HTF ownership or provide labor in lieu of, or as a supplement to, rent payments.

[61 FR 48750, Sept. 16, 1996, as amended at 78 FR 44678, July 24, 2013]

#### **Article VIII. §92.355 Lead-based paint.**

Housing assisted with HTF funds is subject to the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. 4821-4846), the Residential Lead-Based Paint Hazard Reduction Act of 1992 (42 U.S.C. 4851- 4856), and implementing regulations at part 35, subparts A, B, J, K, M and R of this title.

[64 FR 50224, Sept. 15, 1999]



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Development  
Authority

<http://www.ihda.org>

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## **26) NHTF Rehabilitation Standards**

### **ADDENDUM #7**

## **NHTF REHABILITATION STANDARDS**

*In addition to the current Authority's "Standards for Architectural Planning and Construction" and the "HTF Rehabilitation and Construction Guidelines" the following Rehabilitation Standards (Standards) shall be included when financed with Authority provided HTF funds. These Standards shall include the "Property Standards" as noted above to be part of the Rehabilitation Standards, additional clarification is provided below:*

*These Standards are hereby incorporated into the scope of work, the sub-recipient, owner, general contractor and Architect shall ensure compliance with the applicable HTF provisions as noted. The Standards represent the minimum acceptable levels for construction completed through the rehabilitation and is the basis for a uniform inspection of the rehabilitated housing.*

*The project shall obtain a HUD Uniform Physical Condition Standards (UPCS) inspection (using the most current format) which shall identify all Observable Deficiencies and Health and Safety Concerns. The scope of work shall address all noted deficiencies and life threatening concerns so that at the completion of the rehabilitation the noted deficiencies and concerns have been cured.*

*Please visit the HUD Real Estate Assessment Center for information and documents to complete the UPCS inspections. HUD can be accessed at the following underlined hyperlinks: [HUD Physical Inspection Training Materials and Documents](#) and [Physical Inspection Training Materials](#) the [UPCS Comprehensive Listing Inspectable Area form](#) is available in Excel. In addition, the HTF Project Checklist (Addendum #4) is recommended to insure all applicable items are addressed.*

*If any Health and Safety Concern is identified as a Life Threatening Concern it needs to be addressed immediately. Life threatening deficiencies such as the potential for electrical shock, structural failure, carbon monoxide poisoning or noxious fumes, fire safety concerns, etc. needs to be addressed immediately if housing is occupied.*

*Major Systems (as noted above) must be inspected to determine the condition and if it warrants replacement or repair. The Life Expectancy of Housing Components (Addendum #5) provides estimates of the effective life of the various building components. In the event where a Major System component is in satisfactory condition but has a remaining contributory life of less than the affordability period for multifamily/rental projects, or 5 years or less for single family units*

*In this instance these items need to be completed in the scope of work or if for rental housing an appropriately determined replacement reserve needs to be funded so as to address the repair or replacement of the component*



*when it becomes due. The determination of the reserve amounts will be ascertained on a case by case basis and by using the following formula.*

*Cost of repair at time of replacement ÷ Remaining useful life estimate (years) of component = Annual reserve amount.*

*In the event the project does not include approved building plans and specifications, the scope shall provide adequate description of the materials including quantity and cost. All materials shall be new and free from defect. They shall be at a minimum "construction" or "builder" grade quality. The materials shall*



*be installed as per the manufacturer, applicable code or trade standard. Specific methods, techniques or sequential procedures shall be included when required. Descriptions should also contain manufacturer cut sheets when available. Materials and methods should be in adequate detail so there is no confusion between owner and general contractor, that the Authority or sub recipient inspector know exactly what is being constructed and to eliminate the need for change orders due to lack of specification.*





## 27) NHTF Project Checklist

### ADDENDUM #8

## HTF PROJECT CHECKLIST

### ***New Construction***

- Project meets State and local codes, ordinances, and zoning requirements*
- Accessibility*
- Disaster mitigation*
- Written cost estimates, construction contracts and construction documents*
- Construction progress inspections*

### ***Rehabilitation***

- Rehabilitation standards*
- Health and safety*
- Major systems*
- Lead-based paint*
- Inspections*
- Accessibility*
- Disaster mitigation*
- State and local codes, ordinances, and zoning requirements*
- Uniform Physical Condition Standards*
- Construction documents and cost estimates*
- Frequency of inspections*
- Acquisition of standard housing*

### ***Misc***

- Occupied housing by tenants receiving HTF tenant-based rental assistance*
- Manufactured housing*
- 90 day inspection before HTF commitment or no less than 30 days for newly constructed/rehabilitated*

### ***Environmental Review***

- General*
- Responsibility for review*

### ***Labor***

- General- Davis Bacon for 12 or more HTF assisted units in contract (IHDA Construction Rider)*
- Volunteers*
- Sweat equity*

### ***Lead-Based Paint***

- Compliance with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. 4821-*



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*4846), the Residential Lead-Based Paint Hazard Reduction Act of 1992.*



## ILLINOIS HOUSING DEVELOPMENT AUTHORITY STANDARDS FOR PROPERTY NEEDS ASSESSMENTS

December 2014

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As part of the Application for Multifamily Financing, the Illinois Housing Development Authority (IHDA) requires applicants wishing to rehab a property to secure Property Needs Assessments (PNAs) from professional services firms experienced in providing property needs assessment services and capable of producing the desired services in a professional, timely and costconscious manner. All applicants must submit a “Property Needs Assessment” report (attached) and table, as found on IHDA’s website ([www.ihda.org](http://www.ihda.org)).

The preparer of the report shall at all times be an independent observer and cannot be connected in any other fashion to the project such as the design architect, project architect of record, general contractor, property manager or sponsor.

The firm selected by the applicant must meet the Standards for Property Needs Assessments Estimating listed below as well as the Supplemental Consultant standards, attached.

The information below is intended as a guide to applicants in the selection of PNA firms to be used on IHDA funded projects. It is the responsibility of the applicant to make his/her own determination regarding the capability, competence and/or limitations of a consultant. IHDA reserves the right to change or waive any of the requirements below and reject any submitted property needs assessment.

It is anticipated that with the approval of the 2014 QAP the Property Needs Assessment will include an Energy Audit component. Standards for the Green Property Needs Assessment are in development. Until IHDA’s Green PNA standards are finalized, IHDA will accept audit reports prepared in accordance with Fannie Mae’s Green Refinance Plus (Green Physical Needs Assessment Statement of Work and Contractor Qualifications) or Audits performed by CNT Energy Savers. The use of other formats not mentioned herein must receive IHDA approval. At a minimum the Energy Audit shall include a detailed examination of energy uses and other controllable utilities, historical data analysis of building energy use and consumption, and a set of recommendations to identify ways to save the maximum amount of energy and water at a property and capital improvements as cost efficiently as possible.

### **I. Scope of Services**

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The purpose of a Property Needs Assessment is to observe and document readily visible materials and building system defects, which might significantly affect the value of the property, and determine if conditions exist which may have a significant impact on the continued operation of the facility during the evaluation period. **This assessment shall not be used by the developer as his scope of work. It shall be viewed as an addendum to the scope of work prepared by the developer's design architect.**

The applicant is required to arrange for the professional firm to visit the project site to observe the project nature, existing conditions; associated accessibility and other site building restraints which would have costs impacts. The applicant must supply the selected firm with the necessary documents to perform the tasks, such as a full set of plans and specifications.

The assessment shall include a site visit with a minimum of 10% of all units inspected, interviews with property management personnel; inquiries to the local building department, zoning department and fire department; a review of readily available construction documents (drawings and specifications) provided by the property owner; and visual observations of the following systems components: site development, building exterior and interior, building structure, mechanical, electrical and plumbing systems; conveyance systems, life safety/fire protection, and general accessibility compliance.

## II. Format

Professional property needs assessment firms are required to report their findings in IHDA's Property Needs Assessment report (attached) and table (found on the IHDA website at [www.ihda.org](http://www.ihda.org)).

The report shall include: critical repair items, immediate repair and replacement items (twelvemonth needs), long-term physical needs (15 years), analysis of reserves for replacement and costing.

The report 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.

The report is intended to provide a general overview of the building systems and their overall condition. It shall be performed using the degree of skill and care normally exercised by qualified consultants performing similar work. The activities of the assessment shall include observations of visible and readily accessible areas. The observations shall be performed without removing or damaging components of the existing building systems. Consequently, certain assumptions shall be made regarding conditions and operating performance. In some cases, additional studies may be warranted to fully evaluate concerns noted. In addition, system checks or testing of the equipment in the operating mode is beyond the scope of this assessment.

Estimated cost opinions presented in the report shall be from a combination of sources. The primary sources are from *Means Repair and Remodeling Cost Data* and *Means Facilities Maintenance and Repair Cost Data*; past invoices or bid documents provided by site management; as well as the report preparer's experience with costs for similar projects and city cost indexes.

Replacement and Repair Cost estimates shall be based on approximate quantities. Information furnished by site personnel or the property management, if presented, shall be assumed to be reliable.

Actual costs may vary depending on such matters as type and design of remedy; quality of materials and installation; manufacturer of the equipment or system selected; field conditions; whether a physical deficiency is repaired or replaced in whole; phasing of the work; quality of the

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contractor(s); project management exercised; and the availability of time to thoroughly solicit competitive pricing. In view of these limitations, the costs presented in the report shall be considered "order of magnitude" and used for budgeting purposes only. Detailed design and contractor bidding is required to determine actual cost.

A representation regarding the status of accessibility requirements shall be based on visual observation and some physical measuring and, thus, are intended to be a good faith effort to assist the developer by noting nonconforming conditions along with estimates of costs to correct and are not to be considered to be based on a detailed study.

This report is not required to confirm the presence or absence of asbestos, PCBs, lead-based paints, mold or toxic soils on this property but should report them if suspected during the visual inspection.

The preparer of the report shall at all times be an independent observer and cannot be connected in any other fashion to the project such as the design architect, project architect of record, general contractor, property manager or sponsor.

The PNA must be submitted on letterhead and must be signed by the professional services firm preparing the PNA.

IHDA must be explicitly addressed as being able to rely on the PNA.

The PNA firm shall furnish to the applicant a minimum of two (2) hard copies of the final PNA and an electronic copy saved on a CD, DVD or flash drive. The applicant shall submit to IHDA one (1) hard copy and the electronic copy.

IHDA will accept PNA or CNA reports prepared under other similar formats (USDA Rural Development, Fannie Mae or Freddie Mac) to avoid duplication of work prepared under similar formats. The use of other formats not mentioned herein must receive IHDA approval.

### **III. Certification**

PNAs must be prepared by a reviewer who possesses a professional qualification in architecture or engineering, or appropriate experience and/or certifications in the construction fields. The property needs reviewer should have at least ten (10) years experience commensurate with the subject property type and scope (size, complexity, etc.), and experience in the preparation of PNAs.

### **IV. Ethics**

The Code of Ethics and Standards of Practice for the American Institute of Architects shall apply to all individuals providing property assessment services for IHDA projects. The Code can be found at <http://www.aia.org/about/ethicsandbylaws/index.htm>.

### **V. Fee Basis**

Fees for all cost and expenses related to the performance of the scope of services shall be determined between the professional services firm and the applicant. The applicant is responsible for payment of fees and entering into a written agreement with the selected professional services firm. Kickbacks or incentives for procuring inflated values are not permitted.

IHDA shall review the PNA estimation fees associated with the development to insure they are proper, fair and reasonable. IHDA has evaluated the fees from past Authority financed projects, and offers the following maximum:



Illinois Housing <http://www.ihda.org>  
Development  
Authority

Maximum per each unit inspected: \$350

## VI. Questions

Any questions or request for clarification regarding this service must be submitted to Stephen Gladden, Assistant Director of Multifamily Programs at (312) 836-5351 or [sgladden@ihda.org](mailto:sgladden@ihda.org) or the Manager of Architecture and Construction Services, Multifamily Financing Department at (312) 836-5200.

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## ILLINOIS HOUSING DEVELOPMENT AUTHORITY SUPPLEMENTAL PROFESSIONAL SERVICES FIRM REQUIREMENTS

December 2014

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As part of the Application for Multifamily Financing, the Illinois Housing Development Authority (IHDA) requires applicants to secure studies from professional services firms experienced in providing cost estimating services, market studies, Phase I Environmental studies, Rent Comparability Studies, and Property Needs Assessments.

The professional services firms selected by the applicant must meet the Supplemental Consultant standards listed below along with the standards for each discipline as found on the IHDA website.

The information below is intended as a guide to applicants in the selection of consultants to be used on IHDA funded projects. It is the responsibility of the applicant to make his/her own determination regarding the capability, competence and/or limitations of a consultant. IHDA reserves the right to change or waive any of the requirements below and reject any studies.

### **I. Minimum Qualifications**

Professional services firms selected and retained by applicants must be registered with the Illinois Department of Revenue to conduct business in Illinois and not be debarred, suspended or otherwise prohibited from professional practice by any Federal, State or Local Agency.

The selected firm is required to have been in business for a minimum of five (5) years and must demonstrate knowledge and related experiences with regard to preparation of studies for affordable housing projects using federal, state and city funds.

The professional services firm must supply the applicant with documentation of the firm's professional qualifications, including: Illinois Department of Revenue registration, resumes of key members assigned to the project demonstrating a minimum of ten (10) years' experience in the design, development and/or construction of affordable housing.

### **II. Minority Procurement Efforts**

The applicant is required to make a proactive effort in selecting and retaining qualified firms certified as Minority Business Enterprise (MBE), Disadvantaged Business Enterprise (DBEs) and Women Business Enterprise (WBEs) whenever possible. The applicant is required to verify any selected MBEs, DBEs and WBEs are registered and have a valid certification number.

### **III. References**

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The selected firm must supply the applicant at least three (3) professional references pertaining to the firm's experience in performing consultant services for projects of a similar type, scale, and complexity.

#### **IV. Fee Basis**

Fees for all cost and expenses related to the performance of the scope of services shall be determined between the professional services firm and the applicant. The applicant is responsible for payment of fees and entering into a written agreement with the selected professional services firm. Kickbacks or incentives for procuring inflated values will not be permitted.

IHDA shall review the fees associated with the development to insure they are proper, fair and reasonable. IHDA has evaluated the fees from past IHDA financed projects. As such, the fees listed in each specific consultant standard reflect the maximum percentage IHDA will accept as a reasonable fee for services. Higher fee are acceptable but the owner/developer will be responsible to pay the difference between the higher fees and the fees indicated in the individual consultant standards.

#### **V. Insurance**

The selected firm must supply the applicant with proof of Professional Liability insurance with a policy limit of \$1,000,000 per occurrence and \$2,000,000 excess umbrella and must submit a copy of the certificate to IHDA. The applicant will determine and notify the applicant of any additional parties, if required prior to contract issuance. Selected firms must not allow their liability insurance to expire or cancel for any reason during the contract period.

#### **VI. Conflict of Interests**

Professional firms selected to perform services shall not have any direct or indirect interest in any property to be evaluated. IHDA reserves the right to determine necessary actions to eliminate or neutralize any conflict discovered after an applicant secured a professional firm to provide this service.

The professional services firm shall certify that no undue pressure or collusion with the client or their representatives exists in the determination of the study. The study certification shall also state that all information and procedures used to establish the study were from factual data and prepared in a professional manor.

The study must include a statement from the individual signing the study that there is no identity of interest between the signatory and any member of the development team. If any member of the development team or ownership has an identity of interest with the entity providing the study, the identity of interest relationship must be disclosed.

Failure to disclose any organizational conflict of interest may result in rejection of the application and/or the study by the professional firm with the conflict and request of a study from a different firm at applicant's expense.

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**PHYSICAL NEEDS ASSESSMENT**

**GUIDANCE TO THE PROPERTY EVALUATOR**

**SAMPLE REPORT MASTER December 2014**

**PROPERTY NEEDS ASSESSMENT**

**FOR**

**NAME OF PROJECT  
ADDRESS OF PROJECT  
CITY, ILLINOIS ZIP**

**DATE:**

**PREPARED FOR**

**NAME OF CLIENT  
ADDRESS OF CLIENT  
CITY, STATE**

---

**PREPARED BY:**

**NAME**

**ADDRESS**

**CITY, STATE, ZIP**

Date:

Client Name

Address

---

Property Needs Assessment PROPERTY NAME

STREET NUMBER & NAME

CITY, STATE ZIP

Dear Mr. or Ms. ....:

We are pleased to provide the results of the Property Needs Assessment of the PROPERTY NAME in ANY CITY, STATE. This assessment was authorized on Date.

We appreciate the opportunity to provide engineering services to name of client. If you have any questions concerning this report, or if we can assist you in any other manner, please call our office.

Sincerely,

(Your Name)

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APPENDIX A – EXHIBITS  
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**1.0 EXECUTIVE SUMMARY**

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<b>Property Name:</b>	Savoy Apartments
<b>Location:</b>	123 Main Street, Tri-City, Illinois 60198
<b>Date of Assessment</b>	March 20, 2003
<b>Site Information</b>	6.5 Acres

---



<b>Buildings and Amenities:</b>	Apartment Buildings	Five, 3-stories
	Club house/ rental office.	One, 1-story
	Swimming pool	One, Heated
	Maintenance Building	One, 1-story
	Garages	N/A
	Carports	N/A
	Other	N/A
<b>Number of Apartments:</b>	<i>Leased:</i>	95
	<i>Vacant:</i>	5
	<i>Total:</i>	100
<b>Number of Parking Spaces:</b>	<i>Standard:</i>	98
	<i>Disabled:</i>	2
	<i>Total:</i>	100
<b>Number of Parking Spaces Required:</b>	<i>Standard:</i>	96
	<i>Disabled:</i>	4
	<i>Total:</i>	100
<b>Construction Date:</b>	1991	
<b>First Occupancy Date:</b>	1992	

RAH & Associates conducted a walk-through observation of the Savoy Apartments, located at 123 main Street, in Tri city, Illinois on March 15, 2003. This assessment was authorized on March 5, 2007, and performed in general accordance with the proposal dated March 2, 2007.

Generally, the building appears to be in fair to good physical condition. Both the exterior and interior appear to be well maintained. Based on the site observations, there are recommended capital expenditures that should be accomplished during the evaluation period.

The following table presents recommended expenditures categorized as Critical Repair (All deficiencies of health and safety, violation of Section 8 housing quality standards, FHA's regulatory agreement standards that require immediate remediation, and building and fire code violations). Immediate Repair and Replacement Items (All items of significant deferred and other maintenance items that will need to be addressed within 12 months of closing including accessibility requirements), Long Term Physical Needs (All items that require repair and replacement over the evaluation period)

**Capital Expenditures – 15-year Term Period PROPERTY NAME -  
ANY CITY, Illinois**

Item	Property Condition			Critical Repair	Immediate Repair & Replacement	Long Term Repair
	POOR	FAIR	GOOD			
<b>4.01 Site Development</b>				\$	\$	\$
<b>4.02 Building Structure</b>				\$	\$	\$

<b>4.03 Building Structure</b>				\$	\$	\$
<b>4.04 Building Interior</b>				\$	\$	\$
<b>4.05 Mechanical Systems</b>				\$	\$	\$
<b>4.06 Electrical Systems</b>				\$	\$	\$
<b>4.07 Building Plumbing Systems</b>				\$	\$	\$
<b>4.08 Conveyance Systems</b>				\$	\$	\$
<b>4.09 Life Safety/Fire Protection</b>				\$	\$	\$
<b>4.10 Amenities</b>				\$	\$	\$
<b>4.11 Other Structures</b>				\$	\$	\$
<b>Sub Totals</b>				\$	\$	\$
TOTAL FACILITY CAPITAL EXPENDITURES (Accessibility compliance costs and environmental remediation costs are not included)						\$

## 2.0 INTRODUCTION

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### 2.01 RELIANCE

This report was prepared for the use of **Ace Development Company** and the Illinois Housing Development Authority, 401 North Michigan Avenue, Suite 900, Chicago, IL, its successors and/or assigns. This report is expressly and exclusively for the sole use and benefit of the client and the Illinois Housing Development Authority and is not for the use or benefit of, nor may any other person or entity rely upon this report without the advanced written consent of RAH & Associates.

### 2.02 EVALUATION DEFINITIONS

**Good:** Average to above-average condition for the building system or material assessed, with consideration of its age, design and geographical location. Generally, other than normal maintenance, no work is recommended or required.

**Fair:** Average condition for the building system evaluated. Some work is required or recommended, primarily due to the normal aging and wear of the building system, to return to a good condition.

**Poor:** Below average condition for the building system evaluated. Significant work anticipated returning the building system or material to an acceptable condition.

---

## COMMON ABBREVIATIONS

<b>ALEC:</b>	Aluminized Emulsion Coating (Roofing)	<b>HP:</b>	Horsepower
<b>A/V:</b>	Audio Visual Device	<b>HVAC:</b>	Heating, Ventilation & Air Conditioning
<b>BLDG:</b>	Building	<b>IN:</b>	Inches
<b>BOCA:</b>	Building Officials & Code Administrators International, Inc.	<b>KVA:</b>	Kilo-volt amp
<b>BUR:</b>	Built-Up Roof	<b>LF:</b>	Linear Feet
<b>CF:</b>	Cubic Feet	<b>MEP:</b>	Mechanical, Electrical and Plumbing
<b>CIP:</b>	Cast Iron Pipe	<b>MP:</b>	Manual Pull Station
<b>CMP:</b>	Corrugated Metal Pipe	<b>NRA:</b>	Net Rentable Area
<b>CMU:</b>	Concrete Masonry Units	<b>NO:</b>	Number
<b>CY:</b>	Cubic Yard	<b>PB:</b>	Polybutylene
<b>DX:</b>	Direct Expansion	<b>PVC:</b>	Poly Vinyl Chloride
<b>EIFS:</b>	Exterior Insulating Finish System	<b>RCP:</b>	Reinforced Concrete Pipe
<b>EMT:</b>	Electrical Metallic Tubing (Conduit)	<b>SBC:</b>	Standard Building Code
<b>EPDM:</b>	Ethylene Propylene Diene Monomer	<b>SD:</b>	Smoke Detector
<b>F:</b>	Fahrenheit	<b>SF:</b>	Square Feet
<b>FT:</b>	Feet	<b>SY:</b>	Square Yard
<b>GBA:</b>	Gross Building Area	<b>UBC:</b>	Uniform Building Code
<b>HC:</b>	Handicap	<b>VAT:</b>	Vinyl Asbestos Tile
<b>HID:</b>	High-Intensity Discharge (Lighting)	<b>VAV:</b>	Variable Air Volume
		<b>VWC:</b>	Vinyl Wall Covering

### 3.0 GENERAL INFORMATION

---

## GENERAL

The Savoy Apartments is a 3-story, multi-tenant, apartment complex consisting of five, 3-story buildings, each containing 15, one-bedroom units and 15, two-bedroom units for grand total of 150-units. There is a one, 1-story clubhouse/rental office building and a one, 1-story maintenance building. Parking consists of asphalt-pavement. The architectural treatments of the buildings include face brick exterior walls, with a combination of a concrete-tile pitched roof shingles surrounding a low-sloped elastomeric rubber membrane roof area. The facility appears to be in generally good to fair overall condition for its age, use, and design.

## INTERVIEWS

The following individuals were interviewed:

Name	Title	Phone Number
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Laura Smith	On-site Property Manager	309-674-8927
Proctor Jones	Maintenance Supervisor	309-674-8927
Ralph Pulley	Building & Zoning Department Officer	309-674-9200
Captain Robert Lee	Fire Prevention Bureau	309-674-7290

## PROPERTY INFORMATION

The site visit portion of this property condition assessment was performed on March 20, 2003, by RAH & Associates. The weather at the time of our observation was clear with temperatures near 60 degrees Fahrenheit.

<b>Property Name and Address:</b>	
	Savoy Apartments
	123 Main Street
	Tri-City, Illinois
<b>Site Information:</b>	
<b>Surrounding Area:</b>	<i>North:</i> Commercial/Multi-family Residential
	<i>South:</i> Single/Multi-family Residential
	<i>East:</i> Commercial/Multi-family Residential
	<i>West:</i> Commercial/Multi-family Residential
<b>Land Area:</b>	6.5 Acres

<b>Number of Entry Drives:</b>	2
<b>Parking Spaces:</b>	
<i>Standard</i>	98
<i>Handicap</i>	2
<i>Garage Parking</i>	N/A
<i>Total</i>	100
<i>Required</i>	Per current Zoning 150

<b>Building Classification Information:</b>
---

<b>Building Code:</b>	<i>Original Construction:</i>	BOCA - 1984	
	<i>Present:</i>	International Building Code - 2000	
	<i>Code Violations:</i>	None	
<b>Zoning:</b>	R-5		
<b>Compliance with current Zoning Ordinance:</b>	Legal nonconforming use. The R-5 Zoning parking and density regulations have changed. The Zoning Officer reported that if 50% or less of the buildings were destroyed by a disaster, the property could be rebuilt to original configuration. If more than 50% of the buildings are destroyed then the rebuilding of the property would have to comply with the newest ordinance.		
<b>Total Building Area: (SF)</b>	81,000 SF		
<b>Building Coverage:</b>	Approximately 29 percent		
<b>Number of Apartments</b>	<i>Leased</i>	<i>Vacant</i>	<i>Total</i>
	95	5	100
<b>Financial Assisted Programs (Section 8, 236 Housing, etc)</b>	50 - 236 Housing Units and 25 - Section 8 Units		
<b>Geographic Information:</b>			
<b>Seismic Zone:</b>	<u>Zone 2B:</u> Moderate probability of damaging ground motion (UBC 1997)		
<b>Proximity to Flood Plain:</b>	<u>Zone B:</u> Area between the 100-year and 500-year flood plain (per FEMA, Panel 1600020011E, August 2, 1996)		
<b>Utility Suppliers:</b>			
<b>Electric:</b>	Illinois Power Company		
<b>Water:</b>	City of Tri-City		
<b>Storm Sewer</b>	City of Tri-City		
<b>Sanitary Sewer:</b>	City of Tri-City		
<b>Gas:</b>	NICOR		
<b>Telephone:</b>	SBC		

## BUILDING HISTORY

<b>Date of Completion:</b>	1992
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<b>Date(s) of Major Improvements:</b>	1996, 1999, & 2002 Seal coated and re-stripped the parking lot. 2000 Up-graded fire alarm system to meet accessibility standards. 2001 Replaced all appliances & replaced 50% of the roofs	
<b>Status of Occupancy Certificate:</b>	On file with the City	
<b>Current Owner(s):</b>	Tri-City Development, LLC	
<b>Architects:</b>	Unknown	
<b>Structural Engineers:</b>	Unknown	
<b>Mechanical/Electrical Engineers:</b>	Unknown	
<b>Civil Engineers</b>	Unknown	
<b>Building Documents Reviewed:</b>	<i>Drawing(s)</i>	<i>Date</i>
<b>Architectural Drawings</b>	Not available	
<b>MEP Drawings</b>	Not available	
<b>Civil Engineering Drawings</b>	Not available	
<b>Fire protection Drawings</b>	Not available	
<b>A/E Specifications:</b>	Not available	
<b>Geotechnical Soils Report:</b>	Not available	

#### 4.0 PROJECT ASSESSMENT

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##### 4.01 Site Development

###### 401.1 Signage

<i>Description</i>	<i>Observation/Comments</i>
A monument sign at the main entrance provides property identification signage. The sign is suspended between two brick piers and is constructed of wood with painted raised letters. Numbers mounted on the face of building identifies each building.	The site signage appeared to be generally in good condition anticipated to require only routine maintenance over the evaluation period.

###### 401.2 Pavement

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<i>Description</i>	<i>Observation/Comments</i>
<p>The roadways and parking lot pavement consist of asphaltic concrete. The drawings indicate pavement specifications to be 2-½ inch asphalt over 8 inch compacted (¾ inch minus) gravel, compacted to 95% maximum density.</p>	<ul style="list-style-type: none"> <li>The pavement is approximately 17-years old and appeared in good to fair condition, with some cracking observed, primarily along the roadway. The property manager reported that no seal coating has been applied in recent years. It is recommended that crack-sealing, as well as bituminous seal coating and reapplications of pavement markings be completed. <b>Short Term</b></li> <li>Additional bituminous seal coating and reapplications of pavement marking will also be required over the evaluation period. <b>Long Term</b></li> </ul>

#### 4.01.3 Curbs

<i>Description</i>	<i>Observation/Comments</i>
<p>The curbs consist of cast-in-place concrete.</p>	<p>The curbs appear to be in generally good condition, requiring only routine maintenance over the evaluation period.</p>

#### 4.01.4 Sidewalks

<i>Description</i>	<i>Observation/Comments</i>
<p>The sidewalks from the parking areas to the building entries and along the pedestrian paths are constructed of cast-in-place concrete.</p>	<p>The sidewalks appear to be in generally good condition, with no significant cracking observed, requiring only routine maintenance.</p>

#### 4.01.5 Retaining Walls

<i>Description</i>	<i>Observation/Comments</i>
	<p>Not applicable for this site.</p>

#### 4.01.6 Fencing

<i>Description</i>	<i>Observation/Comments</i>
<p>There is a 6-foot high ornamental iron fence spanning between masonry piers along the north and west side of the property.</p> <p>There is a 4-foot high ornamental iron fence and gate surrounding the swimming pool.</p>	<ul style="list-style-type: none"> <li>The fence and masonry piers appear to be in good condition. Painting will be required over the evaluation period. The cost for this item is minimal and considered to be part of routine maintenance.</li> <li>The swimming pool fence and gate appear to be in good condition. Painting will be required over the evaluation period. The cost for this item is minimal and considered to be part of routine maintenance.</li> </ul>

#### 4.01.7 Dumpster Areas

<i>Description</i>	<i>Observation/Comments</i>

The dumpsters are located in 4 areas and sit on a concrete pad within a wood board fence enclosure with a metal gate.

- The refuse contractor owns the dumpsters.
- The wood enclosures appear to be in fair condition. Replacement should be anticipated over the evaluation period. Long Term

**4.01.8 Site Lighting**

*Description*

Pole-mounted HID fixtures located along the driving lanes and in the parking area provide site lighting. Building mounted HID fixtures are spaced along the perimeter walls of the building. Wall mounted incandescent fixtures are mounted at the entrance doors to each building and along side the sliding doors to the patios and balconies.

*Observation/Comments*

- Lighting was not observed at night, however, based on the amount of fixtures provided and their location, the lighting appeared to be adequate.
- The exterior site lighting appears to be in generally good condition requiring only routine maintenance over the evaluation period
- The building lighting HID and incandescent lighting appears to be in generally good condition requiring only routine maintenance over the evaluation period

**4.01.9 Landscaping**

*Description*

The landscaping consists of mature trees, shrubs, and lawns. The lawn and planting areas have an underground irrigation system.

*Observation/Comments*

- The landscaping appears to be in good condition. Plantings that have died due to winter dye-off will requirement replacement. The cost for this item is minimal and is considered to be part of routine maintenance.
- The irrigation system was reported to be in good condition requiring only routine maintenance over the evaluation period.

**4.01.10 Site Drainage**

*Description*

Site storm water from lawns and paved areas appears to drain overland into catch basins located in the parking lots and lawn areas. These catch basins flow via underground piping into an on-site storm water retention area located on the north side of the property.

*Observation/Comments*

The drainage system appears to be adequate and is reported to be in good condition requiring only routine maintenance over the evaluation period.

**4.01.11 Sanitary Sewer**

*Description*

The site sanitary sewer discharges into a municipal sewer main located in Main Street. The civil engineering drawings indicate that the piping material is reinforced concrete.  
The sanitary sewer service to each building is 4inch vitrified clay entering the front of the building.

*Observation/Comments*

Due to hidden conditions the site sanitary sewer system could not be viewed. The Maintenance Supervisor reported that the system appears to be in good condition and no major problems have been experienced.



**4.01.12 Lift Stations**

<i>Description</i>	<i>Observation/Comments</i>
	Not applicable to this project.

**4.01.13 Domestic Water**

<i>Description</i>	<i>Observation/Comments</i>
The 8-inch municipal water main located in Main Street supplies the on-site water lines. The property's water distribution system consists of 6-inch ductile iron pipe located in the main roadways on the property. The system is looped. The water service to each building consists of 1.5-inch copper entering the building in the front. The water meters are located in a concrete vault adjacent to each building.	<ul style="list-style-type: none"> <li>• Due to hidden conditions the site domestic water system could not be viewed. The Maintenance Supervisor reported that the system appears to be in good condition and no major problems have been experienced.</li> </ul>

**4.02 BUILDING STRUCTURE****4.02.1 Geotechnical**

<i>Description</i>	<i>Observation/Comments</i>
	Geotechnical information was not provided for review.

**4.02.2 Foundation**

<i>Description</i>	<i>Observation/Comments</i>
The foundation system is indicated on the drawings to consist of cast-in-place concrete perimeter stem wall bearing on reinforced concrete spread footings around the exterior walls, and individual cast-in-place reinforced concrete pads at exterior and interior column locations.	Due to hidden conditions, the footings could not be evaluated. The foundation walls were open for limited evaluation. No cracking or other instability of the system was observed.

**4.02.3 Slab**

<i>Description</i>	<i>Observation/Comments</i>
The first floor typically consists of a four-inch poured-in-place, reinforced concrete slab bearing on two-inch leveling sand over 6-mill vapor barrier and six-inch compacted gravel.	Observed floors appeared to be level and stable. No significant sign of deflection or movement was observed.

**4.02.4 Superstructure**

<i>Description</i>	<i>Observation/Comments</i>
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<p>The exterior walls consist of load-bearing wood stud framing with interior steel columns and wood floor trusses supporting the upper floor. The roof framing consists of manufactured wood trusses and OSB sheathing.</p>	<p>The superstructure appeared to be in generally good condition. No evidence of structural instability was observed.</p>
<p><b>4.02.5 Floor Framing</b></p>	
<p><i>Description</i></p>	<p><i>Observation/Comments</i></p>
<p>The upper floor is constructed with manufactured wood truss joists supporting the plywood floor deck and lightweight concrete floor fill.</p>	<p>Sign of deflection and movement in the floors were not observed indicating that the floor framing was stable.</p>
<p><b>4.02.6 Roof Framing</b></p>	
<p><i>Description</i></p>	<p><i>Observation/Comments</i></p>
<p>The roof is constructed with manufactured wood truss spaced at approximately 24-inches center-to-center supporting the plywood floor deck and lightweight concrete floor fill.</p>	<ul style="list-style-type: none"> <li>• Sign of deflection and movement in the roof framing were not observed indicating that the roof framing was stable.</li> <li>• Fire retardant plywood sheathing was not observed.</li> </ul>

**4.03 BUILDING EXTERIOR**

<p><b>4.03.1 Wall Assembly/Finish</b></p>	
<p><i>Description</i></p> <p>The exterior walls are constructed of brick veneer over CDX plywood sheathing and 2 x 4 wood stud framing with R-11 fiberglass batt insulation.</p> <p>T-1-11 spandrel panels are located above and below the bedroom windows on all four sides of the building.</p>	<p><i>Observation/Comments</i></p> <ul style="list-style-type: none"> <li>• The exterior brick walls appeared to be in good condition. No evidence of spalling, cracking, or efflorescence was observed.</li> <li>• The T-1-11 wood siding is in fair condition. Replacement of damaged areas and painting will be required within the first year. <b>Short Term</b></li> </ul>
<p><b>4.03.2 Windows; Glass/Glazing</b></p>	
<p><i>Description</i></p> <p>The building's windows consist of double-glazed sliding units, set in anodized aluminum frames.</p>	<p><i>Observation/Comments</i></p> <ul style="list-style-type: none"> <li>• The windows appear to be in fair to poor condition. Thirty windows require immediate replacement required. <b>Critical Repair.</b></li> </ul>

	<ul style="list-style-type: none"> <li>The double pane glass appeared to be in generally good condition. The seals in fourteen units appear to be broken requiring immediate replacement. <b>Critical Repair</b></li> </ul>
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#### 4.03.3 Exterior Doors

<i>Description</i>	<i>Observation/Comments</i>
<p>The main entrance doors to each building consist of full-glass panels set in aluminum frame.</p> <p>The rear exterior doors are insulated metal doors with a 10-inch x 10-inch vision panel. The exterior service doors are insulated metal doors</p>	<ul style="list-style-type: none"> <li>The exterior main entrance doors appeared to be in generally good condition.</li> <li>The exterior insulated metal service doors appear to be in good condition. Scraping and painting will be required over the evaluation period. The cost for this item is minimal and is considered to be part of routine maintenance.</li> </ul>

#### 4.03.4 Sealant

<i>Description</i>	<i>Observation/Comments</i>
Elastomeric type sealant material is applied around areas around windows, doors, and expansion joints.	Observed sealant appears to be dried-out and in poor condition requiring immediate replacement. <b>Critical Repair</b>

#### 4.03.5 Exterior Stairs

<i>Description</i>	<i>Observation/Comments</i>
The exterior stairs are constructed of concrete fill metal pans with steel stringers and metal handrails.	The exterior stairs appear to be in good condition. Scraping and painting will be required over the evaluation period. <b>Long Term</b>

#### 4.03.6 Roofing

<i>Description</i>	<i>Observation/Comments</i>
The building has a pitched roofing system consisting of asphalt shingles over roofing felts. The roof drainage consists of metal gutters and downspouts emptying on concrete splash blocks.	<ul style="list-style-type: none"> <li>The asphalt shingle roofing is 7-years old and appears to be in good condition Based on its EUL of 15 to 20 years, roof replacement is not anticipated over the evaluation period.</li> <li>A roof warranty was not available.</li> <li>The roof drainage appears to be adequate and in good condition requiring only routine maintenance over the evaluation period.</li> </ul>

#### 4.03.7 Skylights

<i>Description</i>	<i>Observation/Comments</i>
	Not applicable for this project.

#### 4.03.8 Patios & Balconies

<i>Description</i>	<i>Observation/Comments</i>
The ground-level patios are cast-in-place reinforced concrete slabs-on-grade.	<ul style="list-style-type: none"> <li>The ground-level patio slabs appear to be in good condition with limited signs of movement and minor cracking. Repairs are minor and</li> </ul>
The upper level balcony framing consists of considered to be routine maintenance. pressure-treated wood joists cantilevered off of the building framing. The balcony decks are 2- inch x 6-inch pressure-treated wood open slat boards. good condition. Painting will be required over the evaluation period. <b>Long Term</b>	<ul style="list-style-type: none"> <li>The upper level balconies appeared to be in good condition.</li> </ul>

The balcony guardrails are metal.

## 4.04 BUILDING INTERIOR

### 4.04.1 Dwelling Units

To establish a representative sample and gain a clear understanding of the overall property condition, Approximately ten percent of the apartment units were observed in order n. The property has a total of 100 units.

Unit Type	Total	Mobility Accessible Units	Sensory Accessible Units	Adaptable Units
1-bedroom, 1-bath	25	1	1	5
2-bedroom, 1-bath	50	2		5
2-bedroom, 2-baths	0			
3-bedroom, 2-baths	25	2	1	5
3-bedroom, 2 ½ baths	0			
Total number of units	100	5	2	15

The following apartments were observed while on-site:

Unit Number	Unit Type	Status
123	One-bedroom, one-bath	Vacant

156	Two-bedroom, one-bath	Occupied
289	Two-bedroom, two-bath	Occupied
345	Three-bedroom, two-bath	Occupied
456	Three-bedroom, two-bath	Vacant – Handicapped Accessible

#### 4.04.2 Common Area Interior Finishes

<b>Common Area Stairs</b>		
<i>Description</i>		<i>Observation/Comments</i>
<p>The Interior stairs consist of closed risers, wood tread units with carpet finish.</p> <p>The handrails are constructed of ornamental iron with wood top rails.</p>		<ul style="list-style-type: none"> <li>The interior stairs appear to be in generally good condition and are anticipated to require only routine maintenance over the evaluation period.</li> <li>The interior stair carpet is three years old and appears to be in fair condition. The EUL of the carpet indicates that replacement will be anticipated during the evaluation period. <b>Long Term</b></li> </ul>
<b>Common Area Doors</b>		
<i>Description</i>		<i>Observation/Comments</i>
The Interior common area doors and apartment entrance doors are typically solidcore doors set in metal frames.		The common area doors appear to be in good condition. Replacement, if required, is considered to be part of routine maintenance.
<b>Corridors</b>		
<i>Floor</i>	Carpet	The carpeting is 9-years old and appears to be in poor condition requiring immediate replacement. <b>Critical Need</b>
<i>Walls</i>	Painted Drywall	The walls appear to be in poor condition. Immediate repair and painting is required. <b>Critical Need</b>
<i>Ceiling</i>	Painted drywall	The walls appear to be in poor condition. Immediate repair and painting is required. <b>Critical Need</b>
<b>Clubhouse/Rental Office</b>		

<b>Foyer</b>		
<i>Floor</i>	Ceramic tile	The ceramic tile original and appears to be in good condition requiring only routine maintenance over the evaluation period.
<i>Walls</i>	Painted drywall	The walls appear to be in good condition. Painting is recommended over the evaluation period. <b>Long Term</b>
<i>Ceiling</i>	2X4 suspended ceiling panels	The ceiling is original and appears to be in good condition requiring only routine maintenance over the evaluation period.
<b>Clubroom</b>		
<i>Floor</i>	Carpet	The carpeting is 5-years old and appears to be in fair condition requiring replacement over the evaluation period. <b>Long Term</b>
<i>Walls</i>	Painted drywall	The walls appear to be in good condition. Painting is recommended over the evaluation period. <b>Long Term</b>
<i>Ceiling</i>	Painted drywall	The ceiling appears to be in good condition. Painting is recommended over the evaluation period. <b>Long Term</b>

<b>Rental Office</b>		
<i>Floor</i>	Carpet	The carpeting is 5-years old and appears to be in fair condition requiring replacement over the evaluation period. <b>Long Term</b>
<i>Walls</i>	Painted drywall/Wall covering	The walls appear to be in good condition. Painting is recommended over the evaluation period. <b>Long Term</b> The walls that are covered with wall covering appear to be in poor condition requiring immediate replacement. <b>Critical need</b>
<i>Ceiling</i>	2X4 suspended ceiling panels	The ceiling is original and appears to be in good condition requiring only routine maintenance over the evaluation period.
<b>Health Club</b>		

<i>Floor</i>	Carpet	The carpeting is 5-years old and appears to be in fair condition requiring replacement over the evaluation period. <b>Long Term</b>
<i>Walls</i>	Painted drywall	The walls appear to be in good condition. Painting is recommended over the evaluation period. <b>Long Term</b>
<i>Ceiling</i>	2X4 suspended ceiling panels	The ceiling is original and appears to be in good condition requiring only routine maintenance over the evaluation period.
<b>Washrooms</b>		
<i>Floor</i>	Vinyl tile	The flooring is original and appears to be in good condition requiring only routine maintenance over the evaluation period.
<i>Walls</i>	Ceramic tile/Painted drywall	The ceramic tile is original and appears to be in good requiring only routine maintenance over the evaluation period.  The drywall walls appear to be in good condition. Painting is recommended over the evaluation period. <b>Long Term</b>
<i>Ceiling</i>	Painted drywall	The ceiling appears to be in good condition. Painting is recommended over the evaluation period. <b>Long Term</b>

<b>Kitchen</b>		
<i>Floor</i>	Quarry tile	The flooring is original and appears to be in good condition requiring only routine maintenance over the evaluation period.
<i>Walls</i>	Washable wall covering	The walls appear to be in good condition requiring only routine maintenance over the evaluation period
<i>Ceiling</i>	2X4 suspended washable ceiling panels	The ceiling is original and appears to be in good condition requiring only routine maintenance over the evaluation period.
<b>Laundry</b>		

<i>Floor</i>	Vinyl tile	The flooring is original and appears to be in good condition requiring only routine maintenance over the evaluation period.
<i>Walls</i>	Painted drywall	The walls appear to be in good condition requiring only routine maintenance over the evaluation period
<i>Ceiling</i>	2X4 suspended ceiling panels	The ceiling is original and appears to be in good condition requiring only routine maintenance over the evaluation period.

**Pool Equipment Room**

<i>Floor</i>	Exposed concrete	The flooring is original and appears to be in good condition requiring only routine maintenance over the evaluation period.
<i>Walls</i>	Drywall	The walls appear to be in good condition requiring only routine maintenance over the evaluation period
<i>Ceiling</i>	Drywall	The ceiling is original and appears to be in good condition requiring only routine maintenance over the evaluation period.

**4.04.3 Apartment Building Finishes**

<i>Description</i>	<i>Observation/Comment</i>
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**Living Room/Dining Room**

<i>Floor</i>	Carpet	The EUL of the carpet indicates that replacement will be anticipated during the evaluation period. <b>Critical Need, Immediate Need &amp; Long term</b>
<i>Walls</i>	Painted drywall	The walls and ceiling appear to be in good condition. Painting is done at tenant turnover and is considered part of routine maintenance.
<i>Ceiling</i>	Painted drywall	

**Kitchen**

<i>Floor</i>	Vinyl tile	The EUL of the vinyl tile indicates that replacement will be anticipated during the evaluation period. <b>Long Term.</b>
<i>Walls</i>	Painted drywall	The walls and ceiling appear to be in good condition. Painting is done at tenant turnover and is considered part of routine maintenance.
<i>Ceiling</i>	Painted drywall	



<i>Cabinets:</i>	Wood	The cabinets are original and appear to be in good to fair condition requiring some replacement during the evaluation period. <b>Critical Need &amp; Immediate Need.</b>
<i>Countertop</i>	Laminated Plastic	The countertops are original and appear to be in good to fair condition requiring some replacement during the evaluation period. <b>Critical Need &amp; Immediate Need.</b>
<b>Bathroom</b>		
<i>Floor</i>	Vinyl Tile	The EUL of the vinyl tile indicates that replacement will be anticipated during the evaluation period. <b>Long Term.</b>
<i>Walls</i>	Painted drywall	The walls and ceiling appear to be in good condition. Painting is done at tenant turnover and is considered part of routine maintenance.
<i>Ceiling</i>	Painted drywall	
<i>Tub/Shower:</i>	Ceramic tile	The tub surrounds appear to be in fair condition requiring some replacement, Critical need & Immediate Need.
<i>Vanity</i>	Wood	The cabinets are original and appear to be in good to fair condition requiring some replacement during the evaluation period. <b>Critical Need &amp; Immediate Need.</b>

<b>Bedroom</b>		
<i>Floor</i>	Carpet	The EUL of the carpet indicates that replacement will be anticipated during the evaluation period. <b>Critical Need, Immediate Need &amp; Long term</b>
<i>Walls</i>	Painted drywall	The walls and ceiling appear to be in good condition. Painting is done at tenant turnover and is considered part of routine maintenance.
<i>Ceiling</i>	Painted drywall	

<b>Utility Room</b>		
<i>Floor</i>	Vinyl tile	The flooring appears to be in good condition requiring only routine maintenance over the evaluation period.
<i>Walls</i>	Painted drywall	The walls and ceiling appear to be in good condition. Painting is done at tenant turnover and is considered part of routine maintenance.
<i>Ceiling</i>	Painted drywall	

<b>4.04.4 Appliances</b>			
<i>Description</i>			<i>Observation/Comment</i>
<i>Appliance</i>	<i>Age Range</i>	<i>Number of Replacements Required</i>	The appliances are generally original but some replacement has occurred. They appear to be in generally good condition. The remaining useful

<i>Refrigerator</i>	1 to 18	23	life indicates that replacement of some of these units will be anticipated during the evaluation period. Critical Need, Immediate Need & <b>Long Term</b>
<i>Appliance</i>	<i>Age Range</i>	<i>Number of Replacements Required</i>	
<i>Refrigerator</i>	1 to 18	23	
<i>Range</i>	2 to 20	35	
<i>Hood</i>	2 to 20	35	
<i>Dishwasher</i>	1 to 15	26	
<i>Microwave</i>	N/A		

#### 4.04.5 Doors

<i>Description</i>	<i>Observation/Comments</i>
<p>The apartment entrance doors are typically solid-core doors set in metal frames.</p> <p>The interior doors within the apartments are typically hollow-core doors set in wood frames.</p>	<ul style="list-style-type: none"> <li>The common area doors and the apartment entrance doors appear to be in good condition. Replacement, if required, is considered to be part of routine maintenance.</li> <li>The hollow-core doors within the apartment appear to be in good condition. Replacement, if required, is considered to be part of routine maintenance.</li> </ul>

#### 4.04.6 Interior Stairs

<i>Description</i>	<i>Observation/Comments</i>
<p>The common area interior stairs consist of closed risers, wood tread units with carpet finish.</p> <p>The handrails are constructed of ornamental iron with wood top rails.</p>	<ul style="list-style-type: none"> <li>The common area interior stairs appear to be in generally good condition and are anticipated to require only routine maintenance over the evaluation period.</li> <li>The common area interior stair carpet is three years old and appears to be in fair condition. The EUL of the carpet indicates that replacement will be anticipated during the evaluation period.</li> </ul> <p><b>Long Term</b></p>

#### 4.04.7 Corridors

<i>Description</i>	<i>Observation/Comments</i>
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<p>The Interior common corridor finish consists of carpet floors, painted drywall walls and ceilings.</p>	<ul style="list-style-type: none"> <li>• The interior common corridor carpet is three years old and appears to be in fair condition. The EUL of common area corridor carpet indicates that replacement of the common corridor and stair carpet will be required. <b>Long Term</b></li> <li>• The interior corridor and stairway walls and ceilings appear to be in fair condition and will require painting during the evaluation period. <b>Long Term</b></li> </ul>
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## 4.05 MECHANICAL SYSTEM

### 4.05.1 Heating/Cooling

<i>Description</i>	<i>Observation/Comments</i>
<p>Heating and cooling for the typical apartment is provided individual, gas-fired, furnaces with split air-conditioning. The furnace is located in the utility closet along with the water heater. The condensing unit is located on a concrete pad on the exterior of the building. The cooling capacity of the units ranges from 1 Ton to 2½ Tons.</p>	<ul style="list-style-type: none"> <li>• The furnaces are reported to be original and in operating condition. The EUL for these units is approximately 15-years. Replacement of these units will be anticipated over the evaluation period. <b>Long Term</b></li> <li>• The condensing units are reported to range in age from 1-year to 12-years. Approximately 20% of the units are less than 5-years old. The EUL for these units is approximately 15-years. Replacement of 80% units will be anticipated over the evaluation period. <b>Long Term</b></li> </ul>

### 4.05.2 Ductwork

<i>Description</i>	<i>Observation/Comments</i>
<p>Supply air distribution is provided through sheet metal ductwork. Return air is through a wall grille at the base of the utility closet. Electric wall-mounted thermostats control the temperature in each unit.</p>	<ul style="list-style-type: none"> <li>• Observation of the ductwork was limited to the furnace closet. It was reported by the Maintenance Supervisor that the ductwork is in good condition and no problems have been experienced with the system</li> </ul>
	<ul style="list-style-type: none"> <li>• Electric wall-mounted thermostats were reported to be in good condition. Replacement is anticipated on an as needed basis. The cost for this item is minimal and considered to be part of routine maintenance.</li> </ul>

### 4.05.3 Ventilation

<i>Description</i>	<i>Observation/Comments</i>

<p>Powered exhaust fans that discharges typically through the roof exhaust the bathrooms.</p> <p>Air from the typical kitchen is exhausted to the exterior by ductwork from the range hood.</p>	<ul style="list-style-type: none"> <li>• The bathroom exhaust system appears to be operational and in good condition. Fan replacement is done on an as needed basis and is considered to be part of routine maintenance</li> <li>• The kitchen exhaust system appears to be operational and in good condition. Fan replacement is done on an as needed basis and is considered to be part of routine maintenance.</li> </ul>
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#### 4.05.4 Energy Management

<i>Description</i>	<i>Observation/Comments</i>
	Not applicable to this project.

### 4.06 ELECTRICAL SYSTEM

#### 4.06.1 Distribution

<i>Description</i>	<i>Observation/Comments</i>
<p>The electric service to the building is run underground from a pad-mounted utility company transformer located on the exterior of the building. The electrical service is rated at 600 Amps, 120/208 volt, three-phase, four-wire. The electric service to each apartment circuit breaker panel is rated at 100 amps. Branch distribution wiring was observed to be copper in metal raceway.</p> <p>The main distribution panel with the electric meters and disconnect switches, are located on the exterior wall of the building. Each apartment is metered separately.</p>	<ul style="list-style-type: none"> <li>• The electric service to the building and to each apartment appears to be adequate.</li> <li>• The main distribution panels, meter banks, and circuit breaker panels appear to be in good condition requiring only routine maintenance.</li> <li>• The copper wiring was reported to be in good condition and no major problems have occurred.</li> </ul>

#### 4.06.2 Transformer

<i>Description</i>	<i>Observation/Comments</i>
There are four pad mounted at this site.	The pad-mounted transformer is owned and maintained by the local power company.

#### 4.06.3 Emergency Generator

<i>Description</i>	<i>Observation/Comments</i>
	Not applicable for this property.

#### 4.06.4 Lighting

<i>Description</i>	<i>Observation/Comments</i>
Interior lighting in the apartments and the common areas are standard incandescent residential grade fixtures commonly used for this type of building.	The lighting appears to be in good condition. Replacement is done on an as needed basis and is considered part of routine maintenance.

#### 4.07 BUILDING PLUMBING SYSTEM

##### 4.07.1 Sanitary System

<i>Description</i>	<i>Observation/Comments</i>
The soil, waste, and vent system within the building is reported to be cast iron.	The Maintenance Supervisor reported that the plumbing system is in good operating condition. Minor problems such as clogged drains are anticipated over the evaluation period and are considered part of routine maintenance.

##### 4.07.2 Water Supply

<i>Description</i>	<i>Observation/Comments</i>
<p>The domestic water service to the building is observed to be 1-1/2-inch copper entering the building on the ground floor. The water piping within the building is observed to be copper.</p> <p>The water meter for each building is located in an exterior concrete vault located adjacent the building.</p>	<p>The building's water distribution systems appears to be well maintained and in generally good condition. The Maintenance Supervisor reported no major problems. Minor problems with the system. Minor problems, such as the repair of leaking faucets, are considered to be part of routine maintenance.</p> <p>The Maintenance Supervisor reported that the water pressure and quantity appears to be adequate.</p>

##### 3.07.3 Water Heaters

<i>Description</i>	<i>Observation/Comments</i>
<p>A 40-gallon gas-fired water heater located in the utility closet in each apartment supplies the hot water needs for that apartment</p> <p>There is an 80-gallon, gas-fired, water heater located in the closet of the laundry that supplies the hot water needs for the laundry.</p>	<ul style="list-style-type: none"> <li>Sixty percent of the 40-gallon water heaters were reported to be original and in good working condition. However, based on their EUL of 15 years, replacement of these units will be anticipated during the evaluation period. <b>Long Term</b></li> <li>The 80-gallon water heater located in the laundry is 2-years old and appears to be in good operating condition.</li> </ul>

##### 4.07.4 Fixtures

<i>Description</i>	<i>Observation/Comments</i>

The plumbing fixtures are standard type for this type of application.

The plumbing fixtures are reported to be in good condition. Replacement is done on an as needed basis and considered to be part of routine maintenance.

**4.07.5 Natural Gas**

*Description*

The building's gas service is a steel pipe service entering the front of the building. The gas piping within the building is reported to be steel. The gas meter is located on the exterior wall of the building.

*Observation/Comments*

The gas pressure and quantity was reported to be adequate.

**4.08 CONVEYANCE SYSTEM**

**4.08.1 Elevators**

*Description*

The property has two hydraulic passenger elevator, providing access to all floors of the building. The elevator was manufactured by Dover Elevator Company and is serviced by ABC Elevator Company. The elevator has a rated capacity of 2,500 pounds.

The elevator machinery is located in a room under the stairs.

The cab finish consists of a vinyl tile floor, plastic laminate wall panel walls, and incandescent recessed lighting in a drywall ceiling.

*Observation/Comments*

- The elevator is the original installation. ADA upgrades were completed in May of 1996. The elevator was last serviced in August 2001.
- The number of elevators and the responsiveness was reported to provide adequate service for the building.
- The elevator service contractor reported that the machine unit for both elevators are original and appear to be in good condition.
- The cab finish is 5 years old and appears to be in good condition. Cab refinishing should be anticipated within the next 7-years. **Long Term**

**4.09 LIFE SAFETY/FIRE PROTECTION**

**4.09.1 Sprinklers/Siamese/Standpipes**

*Description*

The sprinkler system consists of a wet-pipe sprinkler system and a wet standpipe with fire department hose valves and connections on the floor landings in each stair tower. There is a Siamese connection on the exterior of the building, and

The firewater service enters the building in the fire protection equipment room on the first floor along with the domestic water main.

There is a fire pump rated at XXX gpm and a back flow preventer for the system.

*Observation/Comments*

- The sprinkler system is serviced and inspected periodically by the sprinkler service contractor. The last inspection September 2001. The inspection reports indicate that the system appears to be functional and in good condition.
- The fire pump and backflow preventer are tested and inspected at the time the sprinkler system is inspected and the records indicate that the fire pump and the backflow preventer are functional and in good condition.

#### 4.09.2 Fire Hydrants

<i>Description</i>	<i>Observation/Comments</i>
On-site fire hydrants located along the roadways and on islands in the various parking lots.	The fire hydrants are serviced annually by the local fire department.

#### 4.09.3 Emergency & Exit Lighting

<i>Description</i>	<i>Observation/Comments</i>
The building is equipped with battery-pack emergency lights along the corridors and in the stairways. Battery back-up exit lights are located above all required exit doors.	The exit lights and emergency lights appear to be in good condition. The EUL indicates that replacement should be anticipated over the evaluation period. The cost for fixture and battery replacement is minimal and considered to be part of routine maintenance.

#### 4.09.4 Fire Alarm System

<i>Description</i>	<i>Observation/Comments</i>
The typical building is equipped with a fire alarm consisting of a control panel located in the sprinkler equipment, room pull stations and horns with strobes located along the path of exit travel, one enunciator panel located in the main lobby, and smoke detectors located in the common areas	<ul style="list-style-type: none"><li>• A fire alarm service contractor inspects services the fire alarm system periodically. The system was last inspected and tested in August 2001 and the no deficiencies were cited. The results were forwarded to the local fire department .The system appears to be functional and in good condition requiring only routine maintenance over the evaluation period.</li><li>• ADT monitors the fire alarm system and notifies the local fire department in the event of an incident.</li></ul>

#### 4.09.5 Smoke detectors

<i>Description</i>	<i>Observation/Comments</i>
Smoke detectors were observed in each apartment and in the common areas.	<ul style="list-style-type: none"><li>• The apartment smoke detectors located in the apartments are wired into the apartment's electrical panel and sounds the alarm in the apartment only.</li><li>• The common area smoke detectors are wired into the building's fire alarm system. They sound the alarm in the building and notify ADT when activated.</li></ul>

#### 4.09.6 Fire Extinguishers

<i>Description</i>	<i>Observation/Comments</i>
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Type ABC fire extinguishers are located in various areas within the tenant spaces.	A fire extinguisher contractor services the fire extinguishers. The tag indicates that they were last serviced in August 2001.
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#### 4.09.7 Smoke Evacuation

<i>Description</i>	<i>Observation/Comments</i>
	Not applicable to this site.

#### 4.09.8 Carbon Monoxide detectors

<i>Description</i>	<i>Observation/Comments</i>
Carbon monoxide detectors were observed in the apartment. Carbon monoxide detectors located in buildings serviced by natural apartment's electrical panel and sounds the gas alarm in the apartment only.	The apartment carbon monoxide detectors each in the apartments are wired into the are required in the apartment's electrical panel and sounds the gas alarm in the apartment only.

### 4.10 AMENITIES

#### 4.10.1 Swimming Pool

<i>Description</i>	<i>Observation/Comments</i>
The property has one in-ground outdoor swimming pool adjacent to the clubhouse/rental office. The swimming pool is constructed of concrete with ceramic tile at the water line. It has a concrete coping and a concrete walking surface surrounding the pool.	<ul style="list-style-type: none"> <li>The swimming pool appeared to be in good condition, anticipated to require only routine maintenance such as preparing and painting the pool interior surface. Relining should not be expected over the evaluation period.</li> <li>The concrete walking surface surrounding appears to be in good condition. Minor cracking was observed. Repairs are minor and considered to be part of routine maintenance.</li> </ul>

#### 4.10.2 Swimming Pool Equipment

<i>Description</i>	<i>Observation/Comments</i>
The swimming pool equipment is located in the clubhouse building adjacent to the pool. The equipment consists of water filters and circulating pumps. The pool water is heated. The pool water heater is gas-fired and located in the same room as the balance of the pool equipment.	<ul style="list-style-type: none"> <li>The pool equipment appeared to be in good to fair condition. According to its EUL, the pool equipment will need to be replaced during the evaluation period.</li> <li>The water is new and appears to be in good condition anticipated to require only routine maintenance over the evaluation period.</li> </ul>

#### 4.10.3 Children's Play Area

<i>Description</i>	<i>Observation/Comments</i>



There is a children's play area located in the northeast corner of the property. The equipment consists of wood climbing apparatus, one slide, three swings, and a sand box.	The play equipment is reported to be 3-years old and appears to be well maintained and in good condition requiring only routine maintenance over the evaluation period.
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#### 4.11 OTHER STRUCTURES

##### **4.11.1 Clubhouse/Rental Office**

<i>Description</i>	<i>Observation/Comments</i>
The clubhouse building, which houses the rental office, public restrooms with showers and lockers, health club, pool equipment, club room and kitchen, is constructed of materials similar to the apartment buildings. See Section 7.0, Building Architectural and Structural Systems for details.	The clubhouse appears to be in good condition. Interior floor and wall finish replacement will be required over the evaluation period as well as exterior wall finish. The cost of this work is included in the common area carpet and wall finish replacement costs.

##### **4.11.2 Carports**

<i>Description</i>	<i>Observation/Comments</i>
	There are no carports at this site,

##### **4.11.3 Garages**

<i>Description</i>	<i>Observation/Comments</i>
The 20 single-car garages are constructed with vinyl siding attached to 2-inch x 4-inch wood stud walls. The roofs are constructed with manufactured wood trusses and covered asphalt shingles attached and OSB sheathing. There is one, 8-foot x 7-foot vinyl overhead door with an electronic opener. There is one incandescent overhead light fixture in the unit.	<p>The garages are original and appear to be in fair condition. Sections of damaged siding were observed requiring replacement. <b>Short term</b></p> <p>The roofs are reported to be 3-years old and appear to be in good condition requiring only routine maintenance over the evaluation period.</p> <p>The overhead doors appear to be original and in fair condition. Three have been replaced within the last three years. It should be anticipated that the balance would require replacement over the evaluation period. <b>Long Term</b></p>

## **5.0 TERMITE CONSIDERATIONS**

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To the best knowledge of the property manager, termite activity has not been reported at the property; however, no inspections have been performed. The foundation walls of the building are constructed with materials not conducive to termite infiltration. However, exterior walls are constructed of materials that may be conducive to termite infiltration. The facility is located in a region where termites are known to exist. Consequently, the risk of termite activity is considered moderate to high; therefore, a termite inspection is recommended.

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## 6.0 ACCESSIBILITY CODE COMPLIANCE

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One or more of the following accessibility codes may be applicable to the development:

### 6.01 THE ILLINOIS ACCESSIBILITY CODE

The purpose of this Illinois Accessibility Code (IAC or Code) is to implement the Environmental Barriers Act (EBA) [410 ILCS 25] as amended to date, and to replace the former version of the Code (71 Ill. Adm. Code 400) effective May 1, 1988. This Code is intended to ensure that the built environment, including all spaces and elements of all applicable buildings and facilities in the State of Illinois are so designed, constructed, and/or altered to assure the safety and welfare of all members of society and to be readily accessible to, and usable by, environmentally limited persons.

This Code is also intended to resolve areas of difference between the federal accessibility standards, Americans with Disabilities Act Accessibility Guidelines (ADAAG), which are applicable to buildings and facilities covered by the Americans with Disabilities Act (ADA), and the Illinois accessibility standards, IAC, which are applicable to buildings and facilities in the State of Illinois covered by the EBA. The drafters of this Code compared and adopted the stricter of State or federal accessible design standards.

This Code, together with the Environmental Barriers Act (EBA) and the standards incorporated by reference identified in Section 400.120, has the force of a building code and as such is law in the State of Illinois.

#### ***Applicability***

- Buildings and facilities covered: This Code applies to all “**public facilities**” and “Multi-story housing units” as defined and governed by the EBA and located, in whole or in part, within the legal geographic boundaries of the State of Illinois, unless specifically exempted herein. **It also applies to all buildings financed whole or in part or guaranteed by a governmental unit such as the Illinois Housing Development Authority.**
- The fact that a building or facility governed by the EBA is also a facility financed by federal funds is no bar to the application of this Code.
- This Code is applicable when work involving new construction, alterations, additions, historic preservation, restoration, or reconstruction in whole or in part begins after the effective date of this Code. The Code becomes enforceable with the signing of a construction contract, issuance of an official authorization or permit for construction, or the start of construction, whichever occurs first.

This report generally defines the non-compliant elements and physical barriers observed and the estimated costs for modification to provide compliance. This review is not considered to be a full accessibility survey, nor does it likely cover all aspects of non-compliance.

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## **Definitions**

**"Alteration"**: Any modification or renovation that affects or could affect the usability of the building or facility or part of the building or facility. Alteration includes, but is not limited to, remodeling, renovation, rehabilitation, reconstruction, historic preservation, historic reconstruction, historic restoration (as separately required in Section 400.610), changes or rearrangement of the structural parts or elements, extraordinary repairs (as defined herein), changes to or replacement of plumbing fixtures or controls, changes or rearrangement in the plan configuration of walls and full-height partitions, and changes or improvements to parking lots (as separately required in Section 400.510 (e) 10) (C)). **The following work is not considered to be an alteration unless it affects the usability of the building or facility: normal maintenance, re-roofing, interior or exterior redecoration, changes to mechanical and electrical systems, replacement of plumbing, piping or valves, asbestos removal, or installation of fire sprinkler systems. (Section 3, EBA).**

**"Public Facility"**: *Any building, structure, or site improvement which is: owned by or on behalf of a governmental unit; leased, rented or used, in whole or in part, by a governmental unit, or financed, in whole or in part, by a grant or a loan made or guaranteed by a governmental unit; or any building, structure, or site improvement used or held out for use or intended for use by the public or by employees for one or more of, but not limited to, the following: the purpose of gathering, recreation, transient lodging, education, employment, institutional care, or the purchase, rental, sale or acquisition of any goods, personal property or services; places of public display or collection; social service establishments; and stations used for specified public transportation. (Section 3, EBA).*

**"Technically Infeasible"**: With respect to an alteration of a building or a facility, a change that has little likelihood of being accomplished because existing structural conditions would require removing or altering a load-bearing member, which is an essential part of the structural frame; or because other existing physical or site constraints prohibit modification or addition of elements, spaces or features which are in full and strict compliance with the minimum requirements for new construction and which are necessary to provide accessibility. (ADAAG 4.1.6)

## **Alteration Work**

**Section 400.510a** of the Illinois Accessibility Code requires Alterations (as defined in Section 400.210(b)(11)) to existing public facilities to which the Environmental Barriers Act and this Code apply shall be accessible as provided in this Section.

The preparer of this report shall use the developers scope of work and the contractor's or architect's detailed cost estimate to determine which of the following applications apply in determining the level of accessibility required. See the example below.

**Example:** The **Contractor's Sworn Statement** indicates that total cost of the construction work will be \$1,500,000.00. The work **not** considered as alternation work as defined in the Code, such as roofing, new carpeting, and painting and decorating, totals \$100,000.00. The alternation cost is \$1,500,000.00 - \$100,000.00 = \$1,400,000.00. The reproduction cost of the project is determined to be \$5,000,000.00 (\$130.00/SF)

The percentage is  $\$1,400,000.00 \div \$5,000,000.00 = 28\%$ .

**If the alteration costs more than 15% but less than 50% of the reproduction cost of the public facility, and more than \$100,000, the following shall comply with the applicable requirements for new construction** (see Sections 400.310 and 400.320):

**A) the element or space being altered; B) an entrance and a means of egress intended for use by the general public; C) all spaces and elements necessary to provide horizontal and vertical accessible routes between an accessible entrance and means of egress and the element or space being altered. VERTICAL ACCESS EXCEPTION: However, privately owned**

***public facilities are not required to provide vertical access in a building with two levels of occupiable space where the cost of providing such vertical access is more than 20% of the reproduction cost of the public facility; D) at least one accessible toilet room for each sex or a unisex toilet, when permitted, if toilets are provided or required (see subsection (e)(1) of this Section); E) accessible parking spaces, where parking is provided; and***

**F) an accessible route from public sidewalks or from the accessible parking spaces, if provided, to an accessible entrance. (Section 5, EBA).**

**Section 400.510 b) of the Illinois Accessibility Code, Scope is as follows:**

**All Public Facilities - Alteration Costs 15% or Less:**

If the alteration costs 15% or less of the reproduction cost of the public facility, the element or space being altered shall comply with the applicable requirements for new construction (Section 5, EBA) (see Sections 400.310 and 400.320). (See also subsection (b)(6) of this Section for treatment of alterations to Specific categories of public facilities.)

**All Public Facilities Other Than State-Owned - Alteration Costs 15% to 50% and less than \$100,000:**

If the alteration costs more than 15% but less than 50% of the reproduction cost of the public facility, and less than \$100,000, the following shall comply with the applicable requirements for new construction (see Sections 400.310 and 400.320):

A) the element or space being altered; and

B) an entrance and a means of egress intended for use by the general public. (Section 5, EBA). **All Public Facilities Other Than State-Owned - Alteration Costs 15% to 50% and More than \$100,000:**

If the alteration costs more than 15% but less than 50% of the reproduction cost of the public facility, and more than \$100,000, the following shall comply with the applicable requirements for new construction (see Sections 400.310 and 400.320):

A) the element or space being altered;

B) an entrance and a means of egress intended for use by the general public;

C) all spaces and elements necessary to provide horizontal and vertical accessible routes between an accessible entrance and means of egress and the element or space being altered. VERTICAL ACCESS EXCEPTION: However, privately owned

public facilities are not required to provide vertical access in a building with two levels of occupiable space where the cost of providing such vertical access is more than 20% of the reproduction cost of the public facility;

D) at least one accessible toilet room for each sex or a unisex toilet, when permitted, if toilets are provided or required (see subsection (e)(1) of this Section);

E) accessible parking spaces, where parking is provided; and

F) an accessible route from public sidewalks or from the accessible parking spaces, if provided, to an accessible entrance. (Section 5, EBA).

**All Public Facilities - Alteration Costs 50% or More:**

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If the alteration costs 50% or more of the reproduction cost of the public facility, the entire public facility shall comply with the applicable requirements for new construction (see Sections 400.310 and 400.320).

**Alterations to Specific Categories of Public Facilities:**

For religious entities, private clubs, and owner-occupied transient lodging facilities of five units, compliance with the standards adopted by the Capital Development Board is not mandatory if the alteration costs 15% or less of the reproduction cost of the public facility. However, if the cost of the alteration exceeds \$100,000, the element or space being altered must comply with the applicable requirements for new construction (Section 5, EBA) (see Sections 400.310 and 400.320). If the alteration costs more than 15% of the reproduction cost, subsections (b)(3), (4) and (5) above, as applicable, govern.

**Section 400.510d of the Illinois Accessibility Code: Housing**

Scope: Alterations to housing that is owned, financed or guaranteed by a governmental unit is subject to the applicable requirements of subsection (b) of this Section. Privately financed alterations to housing are not covered by the Environmental Barriers Act or this Code. NOTE: All housing, including new construction and some alterations may be subject to federal law. See Fair Housing Amendments Act, 42 U.S.C. 3601 et seq.

**Section 400.520d of the Illinois Accessibility Codes, Exemptions to the Alterations Requirements:**

*Parts of buildings which it would be technically infeasible to make conform to the strict requirements of the Code for new construction, with the approval of the administrative authority.*

**Conclusion**

Every Rehab loan will require a certain degree of accessibility. The level of accessibility work required will depend on the total cost of the alteration construction minus items not considered as alternation work, divided by the replacement cost of the project. The resulting percentage will determine the accessibility work required by the Illinois Accessibility Code that must be included in the alteration project.

A full Accessibility Compliance Survey, which is beyond the scope of this report, may reveal further aspects of the facility, which are not in compliance with other accessibility requirements. Since compliance may have legal consequences, we recommend that the developer consult with his architect to insure that all accessibility requirements have been met.

6.02 SECTION 504 OF THE REHABILITATION ACT (1973)

**Under Section 504 of the Rehabilitation Act of 1973 as amended, no otherwise qualified individual with a disability may be discriminated against in any program or activity receiving federal financial assistance. The purpose of Section 504 is to eliminate discriminatory behavior toward people with disabilities and to provide physical accessibility, thus ensuring that people with disabilities will have the same opportunities in federally funded programs as do people without disabilities. Program accessibility may be achieved by modifying an existing facility, or by moving the program to an accessible location, or by making other accommodations, including construction of new buildings. HUD's final regulation for Section 504 may be found at 24 CFR Part 8. Rehabilitation**

**Substantial alterations** - Section 504 requires that if alterations are undertaken to a housing project that has 15 or more units, and the rehabilitation costs will be 75 percent or more of the replacement cost of

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the completed facility, then such developments are considered to have undergone "substantial alterations" (24 CFR 8.23 (a)). For substantial alterations of multifamily rental housing, the accessibility requirements contained in 24 CFR 8.22 must be followed -- a minimum of 5 percent of the dwelling units in the project (but not less than one unit) must be accessible to individuals with mobility impairments, and an additional 2 percent, at a minimum (but not less than one unit), must be accessible to individuals with sensory impairments.

**Other alterations** -- When **other alterations** that do not meet the regulatory definition of substantial alterations are undertaken in multifamily rental housing projects of any size, these alterations must, to the maximum extent feasible, make the dwelling units accessible to and usable by individuals with disabilities, until a minimum of 5 percent of the dwelling units (but not less than one unit) are accessible to people with mobility impairments, unless HUD prescribes a higher number pursuant to 24 CFR 8.23(b)(2). If alterations of single elements or spaces of a dwelling unit, when considered together, amount to an alteration of a dwelling unit, then the entire dwelling unit shall be made accessible. For this category of rehabilitation the additional 2 percent of the dwelling units requirement for individuals with sensory impairments does not apply. Alterations to common spaces must, to the maximum extent feasible, make those areas accessible. A recipient is not required to make a dwelling unit, common area, facility or element accessible, if doing so would impose undue financial and administrative burdens on the operation of the multifamily housing project (24 CFR 8.23(b)). Therefore, with regards to covered alterations, recipients are only required to provide access up to the point of being an undue financial and administrative burden.

### ***Accessibility Standards***

Dwelling units designed and constructed in accordance with the Uniform Federal Accessibility Standards (UFAS) will be deemed to comply with the Section 504 regulation. For copies of UFAS, contact the HUD Distribution Center at 1-800-767-7468; hearing or speech-impaired persons may access this number via TTY by calling the Federal Information Relay Service at 1800-877-8339. Accessible units must be, to the maximum extent feasible, distributed throughout the projects and sites, and must be available in a sufficient range of sizes and amenities so as not to limit choice.

Generally, the UFAS is the design standard for providing physical accessibility, although other standards that provides equivalent or greater accessibility may be used.

### **6.03 THE AMERICANS WITH DISABILITIES ACT (2010)**

This act is a broad civil rights law guaranteeing equal opportunity for individuals with disabilities in employment, public accommodations, transportation, state and local government services, and telecommunications.

Title II of the ADA applies to all programs, services, and activities provided or made available by public entities. With respect to housing, this includes, for example, public housing and housing provided for state colleges and universities.

Title III of the Act covers all private establishments and facilities considered "public accommodations," such as restaurants, hotels, retail establishments, doctors' offices, theaters, the rental office and related toilets, and access to and through the project from the point of arrival in a multi-family development.

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People with disabilities must have equal opportunity in these establishments, both in terms of physical access and in the enjoyment of services.

#### **6.04 THE FAIR HOUSING ACT**

The Fair Housing Act defines discrimination in housing against persons with disabilities to include a failure "to design and construct" certain new multi-family dwellings so that they are accessible to and usable by persons with disabilities, and particularly people who use wheelchairs. The Act requires all newly constructed multi-family dwellings of four or more units intended for first occupancy after March 13, 1991, to have certain features: an accessible entrance on an accessible route, accessible common and public use areas, doors sufficiently wide to accommodate wheelchairs, accessible routes into and through each dwelling, light switches, electrical outlets, and thermostats in accessible location, reinforcements in bathroom walls to accommodate grab bar installations, and usable kitchens and bathrooms configured so that a wheelchair can maneuver about the space.

Developers, builders, owners, and architects responsible for the design or construction of new multi-family housing may be held liable under the Fair Housing Act if their buildings fail to meet these design requirements. The Department of Justice has brought many enforcement actions against those who failed to do so. Most of the cases have been resolved by consent decrees providing a variety of types of relief, including: retrofitting to bring inaccessible features into compliance where feasible and where it is not -- alternatives (monetary funds or other construction requirements) that will provide for making other housing units accessible; training on the accessibility requirements for those involved in the construction process; a mandate that all new housing projects comply with the accessibility requirements, and monetary relief for those injured by the violations. In addition, the Department has sought to promote accessibility through building codes.

#### Units Covered by the Fair Housing Act

The Fair Housing Act design and construction requirements apply to "covered multifamily dwellings" designed and constructed "for first occupancy" after March 13, 1991. A building was not designed or constructed for first occupancy if:

- It was occupied by March 13, 1991
- If the last building permit or renewal of a building permit was issued on or before June 15, 1990

Buildings where the last building permit was issued on or before June 15, 1990 are not covered by the design and construction requirements. Even if the last building permit was issued after June 15, 1990, if the property was occupied before March 13, 1991, it is not covered. HUD adopted these dates to allow time for the requirements to be considered during the design and construction phase of new properties.

The "first occupancy" language in the statute has been defined in HUD's Fair Housing Act regulations as "a building that has never before been used for any purpose." This means buildings that are rehabilitated are not covered by the design and construction requirements even if the rehabilitation occurs after March 13, 1991 and even if it is substantial rehabilitation.

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A dwelling unit includes:

- A single-family unit in buildings with four or more units
- An apartment
- A room in which people sleep even if they share kitchens or bathrooms, like transitional housing

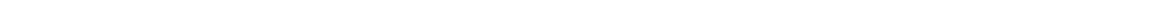
The design and construction requirements apply to "covered multifamily dwellings". Covered multifamily dwellings are:

1. All dwelling units in buildings containing four or more dwelling units if the buildings have one or more elevators AND
2. All ground floor units in other buildings containing four or more units, without an elevator.

This includes housing that is for rental or for sale and applies whether the housing is privately or publicly funded.

Condominiums and apartment buildings are covered by the design and construction requirements. So are time-shares, dormitories, transitional housing, homeless shelters that are used as a residence, student housing, assisted living housing, and others.

# Uniform Physical Condition Standards for Multifamily Housing Rehabilitation



Level – Deficiencies identified must be labeled as Level 1, Level 2, or Level 3 per the REAC-defined levels of deficiency  
[http://www.hud.gov/offices/reac/pdf/pass\\_dict2.3.pdf](http://www.hud.gov/offices/reac/pdf/pass_dict2.3.pdf)

Requirements for Site					
Inspectable Item	Observable Deficiency	Applicable/NA	NLT/LT	Type and Degree of Deficiency which Must be addressed	Site Specific Comments
Fencing and Gates	Damaged/Falling/Leaning		NLT	Fence or gate is missing or damaged to the point it does not function as it should	
	Holes		NLT	Hole in fence or gate is larger than 6 inches by 6 inches	
	Missing Sections		NLT	An exterior fence, security fence or gate is missing a section which could threaten safety or security	
Grounds	Erosion/Rutting Areas		NLT	Runoff has extensively displaced soils which has caused visible damage or potential failure to adjoining structures or threatens the safety of pedestrians or makes the grounds unusable	
	Overgrown/Penetrating Vegetation		NLT	Vegetation has visibly damaged a component, area or system of the property or has made them unusable or unpassable	
	Ponding/Site Drainage		NLT	There is an accumulation of more than 5 inches deep and/or a large section of the grounds-more than 20%-is unusable for its intended purpose due to poor drainage or ponding	
Health & Safety	Air Quality - Sewer Odor Detected		NLT	Sewer odors that could pose a health risk if inhaled for prolonged periods	
	Air Quality - Propane/Natural Gas/Methane Gas Detected		LT	Strong propane, natural gas or methane odors that could pose a risk of explosion/ fire and/or pose a health risk if inhaled	
	Electrical Hazards - Exposed Wires/Open Panels		LT	Any exposed bare wires or openings in electrical panels (capped wires do not pose a risk)	
	Electrical Hazards - Water Leaks on/near Electrical Equipment		LT	Any water leaking, puddling or ponding on or immediately near any electrical apparatus that could pose a risk of fire, electrocution or explosion	
	Flammable Materials - Improperly Stored		NLT	Flammable materials are improperly stored, causing the potential risk of fire or explosion	
	Garbage and Debris - Outdoors		NLT	Too much garbage has gathered-more than the planned storage capacity, or garbage has gathered in an area not sanctioned for staging or storing garbage or debris	

NLT shall indicate "Non-Life Threatening"; LT shall indicate a "Life Threatening" concern which calls for immediate attention or remedy and will show up on the Exigent Health and Safety Report at the end of an inspection.

Level – Deficiencies identified must be labeled as Level 1, Level 2, or Level 3 per the REAC-defined levels of deficiency  
[http://www.hud.gov/offices/reac/pdf/pass\\_dict2.3.pdf](http://www.hud.gov/offices/reac/pdf/pass_dict2.3.pdf)

	Hazards - Other		NLT	Any general defects or hazards that pose risk of bodily injury	
	Hazards - Sharp Edges		NLT	Any physical defect that could cause cutting or breaking of human skin or other bodily harm	
	Hazards - Tripping		NLT	Any physical defect in walkways or other travelled area that poses a tripping risk	
	Infestation - Insects		NLT	Evidence of infestation of insects including roaches and ants throughout a unit or room, food preparation or storage area or other area of	
	Infestation - Rats/Mice/Vermin		NLT	Evidence of rats or mice—sightings, rat or mouse holes, or droppings substantial enough to present a health and safety risk	
Mailboxes/Project Signs	Mailbox Missing/Damaged		NLT	Mailbox cannot be locked or is missing	
	Signs Damaged		NLT	The project sign is not legible or readable because of deterioration or damage	
Parking Lots/ Driveways/ Roads	Cracks		NLT	Cracks that are large enough to affect traffic ability over more than 5% of the property's parking lots/driveways/roads or pose a safety hazard	
	Ponding		NLT	3 inches or more of water has accumulated making 5% or more of a parking lot/driveway unusable or unsafe	
	Potholes/Loose Material		NLT	Potholes or loose material that have made a parking lot/driveway unusable/unpassable for vehicles and/or pedestrians or could cause tripping or falling	
	Settlement/Heaving		NLT	Settlement/heaving has made a parking lot/driveway unusable/unpassable or creates unsafe conditions for pedestrians and vehicles	
Play Areas and Equipment	Damaged/Broken Equipment		NLT	More than 20% of the equipment is broken or does not operate as it should or any item that poses a safety risk	
	Deteriorated Play Area Surface		NLT	More than 20% of the play surface area shows deterioration or the play surface area could cause tripping or falling and thus poses a safety risk	
Refuse Disposal	Broken/Damaged Enclosure- Inadequate Outside Storage Space		NLT	A single wall or gate of the enclosure has collapsed or is leaning and in danger of falling or trash cannot be stored in the designated area because it is too small to store refuse until disposal	

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Retaining Walls	Damaged/Falling/Leaning		NLT	A retaining wall is damaged and does not function as it should or is a safety risk
Storm Drainage	Damaged/Obstructed		NLT	The system is partially or fully blocked by a large quantity of debris, causing backup into adjacent areas or runoffs into areas where runoff is not intended
Walkways/Steps	Broken/Missing Hand Railing		NLT	The hand rail is missing, damaged, loose or otherwise unusable
	Cracks/Settlement/Heaving		NLT	Cracks, hinging/tilting or missing sections that affect traffic ability over more than 5% of the property's walkways/steps or any defect that creates a tripping or falling hazard
	Spalling/Exposed rebar		NLT	More than 5% of walkways have large areas of spalling—larger than 4 inches by 4 inches—that affects traffic ability
Doors	Damaged Frames/Threshold/Lintels/Trim		NLT	Any door that is not functioning or cannot be locked because of damage to the frame, threshold, lintel or trim
	Damaged Hardware/Locks		NLT	Any door that does not function as it should or cannot be locked because of damage to the door's hardware
	Damaged Surface (Holes/Paint/Rusting/Glass)		NLT	Any door that has a hole or holes greater than 1 inch in diameter, significant peeling/cracking/no paint or rust that affects the integrity of the door surface, or broken/missing glass
	Damaged/Missing Screen/Storm/Security Door		NLT	Any screen door or storm door that is damaged or is missing screens or glass—shown by an empty frame or frames or any security door that is not functioning or is missing
	Deteriorated/Missing Caulking/Seals		NLT	The seals/caulking is missing on any entry door, or they are so damaged that they do not function as they should
	Missing Door		NLT	Any exterior door that is missing
Fire Escapes	Blocked Egress/Ladders		LT	Stored items or other barriers restrict or block people from exiting
	Visibly Missing Components		NLT	Any of the functional components that affect the function of the fire escape—one section of a ladder or railing, for example—are missing

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Foundations	Cracks/Gaps		NLT	Large cracks in foundation more than 3/8 inches wide by 3/8 inches deep by 6 inches long that present a possible sign of a serious structural problem, or opportunity for water penetration or sections of wall or floor that are broken apart
	Spalling/Exposed Rebar		NLT	Significant spalled areas affecting more than 10% of any foundation wall or any exposed reinforcing material--rebar or other
Health and Safety	Electrical Hazards - Exposed Wires/Open Panels		LT	Any exposed bare wires or openings in electrical panels (capped wires do not pose a risk)
	Electrical Hazards - Water Leaks on/near Electrical Equipment		LT	Any water leaking, puddling or ponding on or immediately near any electrical apparatus that could pose a risk of fire, electrocution or explosion
	Emergency Fire Exits - Emergency/Fire Exits Blocked/Unusable		LT	The exit cannot be used or exit is limited because a door or window is nailed shut, a lock is broken, panic hardware is chained, debris, storage, or other
	Emergency Fire Exits - Missing Exit Signs		NLT	Exit signs that clearly identify all emergency exits are missing or there is no illumination in the area of the sign
	Flammable/Combustible Materials - Improperly Stored		NLT	Flammable materials are improperly stored, causing the potential risk of fire or explosion
	Garbage and Debris - Outdoors		NLT	Too much garbage has gathered-more than the planned storage capacity or garbage has gathered in an area not sanctioned for staging or storing garbage or debris
	Hazards - Other		NLT	Any general defects or hazards that pose risk of bodily injury
	Hazards - Sharp Edges		NLT	Any physical defect that could cause cutting or breaking of human skin or other bodily harm
	Hazards - Tripping		NLT	Any physical defect in walkways or other travelled area that poses a tripping risk
	Infestation - Insects		NLT	Evidence of infestation of insects-including roaches and ants-throughout a unit or room, food preparation or storage area or other area of building substantial enough to present a health and safety risk
	Infestation - Rats/Mice/Vermin		NLT	Evidence of rats or mice--sightings, rat or mouse holes, or droppings substantial enough to present a health and safety risk

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Lighting	Broken Fixtures/Bulbs		NLT	10% or more of the lighting fixtures and bulbs surveyed are broken or missing	
Roofs	Damaged Soffits/Fascia		NLT	Soffits or fascia that should be there are missing or so damaged that water penetration is visibly possible	
	Damaged Vents		NLT	Vents are missing or so visibly damaged that further roof damage is possible	
	Damaged/Clogged Drains		NLT	The drain is damaged or partially clogged with debris or the drain no longer functions	
	Damaged/Torn Membrane/Missing Ballast		NLT	Ballast has shifted and no longer functions as it should or there is damage to the roof membrane that may result in water penetration	
	Missing/Damaged Components From Downspout/Gutter		NLT	Drainage system components are missing or damaged causing visible damage to the roof, structure, exterior wall surface, or interior	
	Missing/Damaged Shingles		NLT	Roofing shingles are missing or damaged enough to create a risk of water penetration	
	Ponding		NLT	Evidence of standing water on roof, causing potential or visible damage to roof surface or underlying materials	
Walls	Cracks/Gaps		NLT	Any large crack or gap that is more than 3/8 inches wide or deep and 6 inches long that presents a possible sign of serious structural problem or opportunity for water penetration	
	Damaged Chimneys		NLT	Part or all of the chimney has visibly separated from the adjacent wall or there are cracked or missing pieces large enough to present a sign of chimney failure or there is a risk of falling pieces that could create a safety hazard	
	Missing/Damaged Caulking/Mortar		NLT	Any exterior wall caulking or mortar deterioration that presents a risk of water penetration or risk of structural damage	
	Missing Pieces/Holes/Spalling		NLT	Any exterior wall deterioration or holes of any size that present a risk of water penetration or risk of structural damage	
	Stained/Peeling/Needs Paint		NLT	More than 20% of the exterior paint is peeling or paint is missing and siding surface is exposed thereby exposing siding to water penetration and deterioration	

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Windows	Broken/Missing/Cracked Panes		NLT	Any missing panes of glass or cracked panes of glass where the crack is either greater than 4" and/or substantial enough to impact the structural integrity of the window pane
	Damaged Sills/Frames/Lintels/Trim		NLT	Sills, frames, lintels, or trim are missing or damaged, exposing the inside of the surrounding walls and compromising its weather tightness
	Damaged/Missing Screens		NLT	Missing screens or screens with holes greater than 1 inch by 1 inch or tears greater than 2 inches in length
	Missing/Deteriorated Caulking/Seals/Glazing Compound		NLT	There are missing or deteriorated caulk or seals--with evidence of leaks or damage to the window or surrounding structure
	Peeling/Needs Paint		NLT	More than 20% of the exterior window paint is peeling or paint is missing and window frame surface is exposed thereby exposing window frame to water penetration and deterioration
	Security Bars Prevent Egress		LT	The ability to exit through egress window is limited by security bars that do not function properly and, therefore, pose safety risks
Domestic Water	Leaking Central Water Supply		NLT	Leaking water from water supply line is observed
	Missing Pressure Relief Valve		NLT	There is no pressure relief valve or pressure relief valve does not drain down to the floor
	Rust/Corrosion on Heater Chimney		NLT	The water heater chimney shows evidence of flaking, discoloration, pitting, or crevices that may create holes that could allow toxic gases to leak from the chimney
	Water Supply Inoperable		NLT	There is no running water in any area of the building where there should be
Electrical System	Blocked Access/Improper Storage		NLT	One or more fixed items or items of sufficient size and weight impede access to the building system's electrical panel during an emergency
	Burnt Breakers		NLT	Carbon residue, melted breakers or arcing scars are evident

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	Evidence of Leaks/Corrosion		NLT	Any corrosion that affects the condition of the components that carry current or any stains or rust on the interior of electrical enclosures, or any evidence of water leaks in the enclosure or hardware
	Frayed Wiring		NLT	Any nicks, abrasion, or fraying of the insulation that exposes any conducting wire
	Missing Breakers/Fuses		NLT	Any open and/or exposed breaker port
	Missing Outlet Covers		LT	A cover is missing, which results in exposed visible electrical connections
Elevators	Not Operable		NLT	The elevator does not function at all or the elevator doors open when the cab is not there
Emergency Power	Auxiliary Lighting Inoperable (if applicable)		NLT	Auxiliary lighting does not function
Fire Protection	Missing Sprinkler Head		NLT	Any sprinkler head is missing, visibly disabled, painted over, blocked, or capped
	Missing/Damaged/Expired Extinguishers		LT	There is missing, damaged or expired fire extinguisher in any area of the building where a fire extinguisher is required
Health & Safety	Air Quality - Mold and/or Mildew Observed			Evidence of mold or mildew is observed that is substantial enough to pose a health risk
	Air Quality - Propane/Natural Gas/Methane Gas Detected		LT	Strong propane, natural gas or methane odors that could pose a risk of explosion/ fire and/or pose a health risk if inhaled
	Air Quality - Sewer Odor Detected		NLT	Sewer odors that could pose a health risk if inhaled for prolonged periods
	Electrical Hazards - Exposed Wires/Open Panels		LT	Any exposed bare wires or openings in electrical panels (capped wires do not pose a risk)
	Electrical Hazards - Water Leaks on/near Electrical Equipment		LT	Any water leaking, puddling or ponding on or immediately near any electrical apparatus that could pose a risk of fire, electrocution or explosion
	Elevator - Tripping		NLT	An elevator is misaligned with the floor by more than 3/4 of an inch. The elevator does not level as it should, which causes a tripping hazard

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	Emergency Fire Exits - Emergency/Fire Exits Blocked/Unusable		LT	The exit cannot be used or exit is limited because a door or window is nailed shut, a lock is broken, panic hardware is chained, debris, storage, or other conditions block exit	
	Emergency Fire Exits - Missing Exit Signs		NLT	Exit signs that clearly identify all emergency exits are missing or there is no illumination in the area of the sign	
	Flammable Materials - Improperly Stored		NLT	Flammable materials are improperly stored, causing the potential risk of fire or explosion	
	Garbage and Debris - Indoors		NLT	Too much garbage has gathered more than the planned storage capacity or garbage has gathered in an area not sanctioned for staging or storing garbage or debris	
	Hazards - Other		NLT	Any general defects or hazards that pose risk of bodily injury	
	Hazards - Sharp Edges		NLT	Any physical defect that could cause cutting or breaking of human skin or other bodily harm	
	Hazards – Tripping Hazards		NLT	Any physical defect in walkways or other travelled area that poses a tripping risk	
	Infestation - Insects		NLT	Evidence of infestation of insects-including roaches and ants-throughout a unit or room, food preparation or storage area or other area of building substantial enough to present a health and safety risk	
	Infestation - Rats/Mice/Vermin		NLT	Evidence of rats or mice-sightings, rat or mouse holes, or droppings substantial enough to present a health and safety risk	
HVAC	Boiler/Pump Leaks		NLT	Evidence of water or steam leaking in piping or pump packing	
	Fuel Supply Leaks		NLT	Evidence of any amount of fuel leaking from the supply tank or piping	
	General Rust/Corrosion		NLT	Significant formations of metal oxides, significant flaking, discoloration, or the development of a noticeable pit or crevice	
	Misaligned Chimney/Ventilation System		LT	A misalignment of an exhaust system on a combustion fuel-fired unit (oil, natural gas, propane, wood pellets etc.) that causes improper or dangerous venting of gases	
Roof Exhaust System	Roof Exhaust Fan(s) Inoperable		NLT	The roof exhaust fan unit does not function	

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Sanitary System	Broken/Leaking/Clogged Pipes or Drains		NLT	Evidence of active leaks in or around the system components or evidence of standing water, puddles or ponding—a sign of leaks or clogged drains
	Missing Drain/Cleanout/Manhole Covers		NLT	A protective cover is missing
Basement/Garage/Carport	Baluster/Side Railings - Damaged		NLT	Any damaged or missing balusters or side rails that limit the safe use of an area
Closet/Utility/Mechanical	Cabinets - Missing/Damaged		NLT	10% or more of cabinet, doors, or shelves are missing or the laminate is separating
Community Room	Call for Aid - Inoperable		NLT	The system does not function as it should
Halls/Corridors/Stairs	Ceiling - Holes/Missing Tiles/Panels/Cracks		NLT	Any holes in ceiling, missing tiles or large cracks wider than 1/4 of an inch and greater than 11 inches long
Kitchen	Ceiling - Peeling/Needs Paint		NLT	More than 10% of ceiling has peeling paint or is missing paint
Laundry Room	Ceiling - Water Stains/Water Damage/Mold/Mildew		NLT	Evidence of a leak, mold or mildew—such as a darkened area—over a ceiling area greater than 1 foot square
Lobby	Countertops - Missing/Damaged		NLT	10% or more of the countertop working surface is missing, deteriorated, or damaged below the laminate —not a sanitary surface to prepare food
Office	Dishwasher/Garbage Disposal - Inoperable		NLT	The dishwasher or garbage disposal does not operate as it should
Other Community Spaces	Doors - Damaged Frames/Threshold/Lintels/Trim		NLT	Any door that is not functioning or cannot be locked because of damage to the frame, threshold, lintel or trim
Patio/Porch/Balcony	Doors - Damaged Hardware/Locks		NLT	Any door that does not function as it should or cannot be locked because of damage to the door's hardware
Restrooms	Doors - Damaged Surface (Holes/Paint/Rust/Glass)		NLT	Any door that has a hole or holes greater than 1 inch in diameter, significant peeling/cracking/no paint or rust that affects the integrity of the door surface, or broken/missing glass
Storage	Doors - Damaged/Missing Screen/Storm/Security Door		NLT	Any screen door or storm door that is damaged or is missing screens or glass—shown by an empty frame or frames or any security door that is not functioning or is missing

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Doors - Deteriorated/Missing Seals (Entry Only)		NLT	The seals/caulking is missing on any entry door, or they are so damaged that they do not function as they should
Doors - Missing Door		NLT	Any door that is missing that is required for the functional use of the space
Dryer Vent - Missing/Damaged/Inoperable		NLT	The dryer vent is missing or it is not functioning because it is blocked. Dryer exhaust is not effectively vented to the outside
Electrical - Blocked Access to Electrical Panel		NLT	One or more fixed items or items of sufficient size and weight impede access to the building system's electrical panel during an emergency
Electrical - Burnt Breakers		NLT	Carbon residue, melted breakers or arcing scars are evident
Electrical - Evidence of Leaks/Corrosion		NLT	Any corrosion that affects the condition of the components that carry current or any stains or rust on the interior of electrical enclosures or any evidence of water leaks in the enclosure or hardware
Electrical - Frayed Wiring		NLT	Any nicks, abrasion, or fraying of the insulation that exposes any conducting wire
Electrical - Missing Breakers		NLT	Any open and/or exposed breaker port
Electrical - Missing Covers		LT	A cover is missing, which results in exposed visible electrical connections
Floors - Bulging/Buckling		NLT	Any flooring that is bulging, buckling or sagging or a problem with alignment between flooring types
Floors - Floor Covering Damaged		NLT	More than 10% of floor covering has stains, surface burns, shallow cuts, small holes, tears, loose areas or exposed seams.
Floors - Missing Floor/Tiles		NLT	More than 5% of the flooring or tile flooring is missing
Floors - Peeling/Needs Paint		NLT	Any painted flooring that has peeling or missing paint on more than 10% of the surface
Floors - Rot/Deteriorated Subfloor		NLT	Any rotted or deteriorated subflooring greater than 6 inches by 6 inches
Floors - Water Stains/Water Damage/Mold/Mildew		NLT	Evidence of a leak, mold or mildew--such as a darkened area--covering a flooring area greater than 1 foot square
GFI - Inoperable		NLT	The GFI does not function

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Graffiti		NLT	Any graffiti on any exposed surface greater than 6 inches by 6 inches
HVAC - Convection/Radiant Heat System Covers Missing/Damaged		NLT	Cover is missing or substantially damaged, allowing contact with heating/surface elements or associated fans
HVAC - General Rust/Corrosion		NLT	Significant formations of metal oxides, flaking, or discoloration--or a pit or crevice
HVAC - Inoperable		NLT	HVAC does not function. It does not provide the heating and cooling it should. The system does not respond when the controls are engaged
HVAC - Misaligned Chimney/Ventilation System		LT	Any misalignment that may cause improper or dangerous venting of gases
HVAC - Noisy/Vibrating/Leaking		NLT	HVAC system shows signs of abnormal vibrations, other noise, or leaks when engaged
Lavatory Sink - Damaged/Missing		NLT	Sink has extensive discoloration or cracks in over 50% of the basin or the sink or associated hardware have failed or are missing and the sink can't be used
Lighting - Missing/Damaged/Inoperable Fixture		NLT	More than 10% of the permanent lighting fixtures are missing or damaged so they do not function
Mailbox - Missing/Damaged		NLT	The U.S Postal Service mailbox cannot be locked or is missing
Outlets/Switches/Cover Plates - Missing/Broken		NLT	Outlet or switch is missing or a cover plate is missing or broken, resulting in exposed wiring
Pedestrian/Wheelchair Ramp		NLT	A walkway or ramp is damaged and cannot be used by people on foot, in wheelchair, or using walkers
Plumbing - Clogged Drains		NLT	Drain is substantially or completely clogged or has suffered extensive deterioration
Plumbing - Leaking Faucet/Pipes		NLT	A steady leak that is adversely affecting the surrounding area
Range Hood /Exhaust Fans - Excessive Grease/Inoperable		NLT	A substantial accumulation of dirt or grease that threatens the free passage of air
Range/Stove - Missing/Damaged/Inoperable		NLT	One or more burners are not functioning or doors or drawers are impeded or on gas ranges pilot is out and/or flames are not distributed equally or oven not functioning

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Refrigerator - Damaged/Inoperable		NLT	The refrigerator has an extensive accumulation of ice or the seals around the doors are deteriorated or is damaged in any way which substantially impacts its performance
Restroom Cabinet - Damaged/Missing		NLT	Damaged or missing shelves, vanity top, drawers, or doors that are not functioning as they should for storage or their intended purpose
Shower/Tub - Damaged/Missing		NLT	Any cracks in tub or shower through which water can pass or extensive discoloration over more than 20% of tub or shower surface or tub or shower is missing
Sink - Missing/Damaged		NLT	Any cracks in sink through which water can pass or extensive discoloration over more than 20% of the sink surface or sink is missing
Smoke Detector - Missing/Inoperable		LT	Smoke detector is missing or does not function as it should
Stairs - Broken/Damaged/Missing Steps		NLT	A step is missing or broken
Stairs - Broken/Missing Hand Railing		NLT	The hand rail is missing, damaged, loose or otherwise unusable
Ventilation/Exhaust System - Inoperable		NLT	Exhaust fan is not functioning or window designed for ventilation does not open
Walls - Bulging/Buckling		NLT	Bulging, buckling or sagging walls or a lack of horizontal alignment
Walls - Damaged		NLT	Any hole in wall greater than 2 inches by 2 inches
Walls - Damaged/Deteriorated Trim		NLT	10% or more of the wall trim is damaged
Walls - Peeling/Needs Paint		NLT	10% or more of interior wall paint is peeling or missing
Walls - Water Stains/Water Damage/Mold/Mildew		NLT	Evidence of a leak, mold or mildew--such as a common area--covering a wall area greater than 1 foot square
Water Closet/Toilet - Damaged/Clogged/Missing		NLT	Fixture elements--seat, flush handle, cover etc.--are missing or damaged or the toilet seat is cracked or has a broken hinge or toilet cannot be flushed

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	Windows - Cracked/Broken/Missing Panes		NLT	Any missing panes of glass or cracked panes of glass where the crack is either greater than 4" and/or substantial enough to impact the structural integrity of the window pane	
	Windows - Damaged Window Sill		NLT	The sill is damaged enough to expose the inside of the surrounding walls and compromise its weather tightness	
	Windows - Inoperable/Not Lockable		NLT	Any window that is not functioning or cannot be secured because lock is broken	
	Windows - Missing/Deteriorated Caulking/Seals/Glazing Compound		NLT	There are missing or deteriorated caulk or seals--with evidence of leaks or damage to the window or surrounding structure	
	Windows - Peeling/Needs Paint		NLT	More than 10% of interior window paint is peeling or missing	
	Windows - Security Bars Prevent Egress		LT	The ability to exit through the window is limited by security bars that do not function properly and, therefore, pose safety risks	
Health & Safety	Air Quality - Mold and/or Mildew Observed			Evidence of mold or mildew is observed that is substantial enough to pose a health risk	
	Air Quality - Propane/Natural Gas/Methane Gas Detected		LT	Strong propane, natural gas or methane odors that could pose a risk of explosion/ fire and/or pose a health risk if inhaled	
	Air Quality - Sewer Odor Detected			Sewer odors that could pose a health risk if inhaled for prolonged periods	
	Electrical Hazards - Exposed Wires/Open Panels		LT	Any exposed bare wires or openings in electrical panels (capped wires do not pose a risk)	
	Electrical Hazards - Water Leaks on/near Electrical Equipment		LT	Any water leaking, puddling or ponding on or immediately near any electrical apparatus that could pose a risk of fire, electrocution or explosion	
	Emergency Fire Exits - Emergency/Fire Exits Blocked/Unusable		NLT	The exit cannot be used or exit is limited because a door or window is nailed shut, a lock is broken, panic hardware is chained, debris, storage, or other conditions block exit	
	Emergency Fire Exits - Missing Exit Signs		NLT	Exit signs that clearly identify all emergency exits are missing or there is no illumination in the area of the sign	

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	Flammable/Combustible Materials - Improperly Stored		NLT	Flammable or combustible materials are improperly stored, causing the potential risk of fire or explosion
	Garbage and Debris - Indoors		NLT	Too much garbage has gathered-more than the planned storage capacity or garbage has gathered in an area not sanctioned for staging or storing garbage or debris
	Garbage and Debris - Outdoors		NLT	Too much garbage has gathered-more than the planned storage capacity or garbage has gathered in an area not sanctioned for staging or storing garbage or debris
	Hazards - Other		NLT	Any general defects or hazards that pose risk of bodily injury
	Hazards - Sharp Edges		NLT	Any physical defect that could cause cutting or breaking of human skin or other bodily harm
	Hazards - Tripping		NLT	Any physical defect in walkways or other travelled area that poses a tripping risk
	Infestation - Insects		NLT	Evidence of infestation of insects-including roaches and ants-throughout a unit or room, food preparation or storage area or other area of building substantial enough to present a health and safety risk
	Infestation - Rats/Mice/Vermin		NLT	Evidence of rats or mice-sightings, rat or mouse holes, or droppings substantial enough to present a health and safety risk
Pools and Related Structures	Fencing - Damaged/Not Intact		NLT	Any damage that could compromise the integrity of the fence
Trash Collection Areas	Chutes - Damaged/Missing Components		NLT	Garbage has backed up into chutes, because the collection structure is missing or broken or compactors or components-chute, chute door, and other components-have failed
Bathroom	Bathroom Cabinets - Damaged/Missing		NLT	Damaged or missing shelves, vanity tops, drawers, or doors that are not functioning as they should for storage or their intended purpose
	Lavatory Sink - Damaged/Missing		NLT	Any cracks in sink through which water can pass or extensive discoloration over more than 10% of the sink surface or sink is missing
	Plumbing - Clogged Drains, Faucets		NLT	Drain or faucet is substantially or completely clogged or has suffered extensive deterioration

NLT shall indicate "Non-Life Threatening"; LT shall indicate a "Life Threatening" concern which calls for immediate attention or remedy and will show up on the Exigent Health and Safety Report at the end of an inspection.



Level – Deficiencies identified must be labeled as Level 1, Level 2, or Level 3 per the REAC-defined levels of deficiency  
[http://www.hud.gov/offices/reac/pdf/pass\\_dict2.3.pdf](http://www.hud.gov/offices/reac/pdf/pass_dict2.3.pdf)

	Plumbing - Leaking Faucet/Pipes		NLT	A steady leak that is adversely affecting the surrounding area	
	Shower/Tub - Damaged/Missing		NLT	Any cracks in tub or shower through which water can pass or extensive discoloration over more than 20% of tub or shower surface or tub or shower is missing	
	Ventilation/Exhaust System – Absent/Inoperable		NLT	exhaust fan is not functioning or window designed for ventilation does not open	
	Water Closet/Toilet - Damaged/Clogged/Missing		NLT	Fixture elements--seat, flush handle, cover etc.--are missing or damaged or the toilet seat is cracked or has a broken hinge or toilet cannot be flushed	
Call-for-Aid (if applicable)	Inoperable		NLT	The system does not function as it should	
Ceiling	Bulging/Buckling/Leaking		NLT	Bulging, buckling or sagging ceiling or problem with alignment	
	Holes/Missing Tiles/Panels/Cracks		NLT	Any holes in ceiling, missing tiles or large cracks wider than 1/4 of an inch and greater than 6 inches long	
	Peeling/Needs Paint		NLT	More than 10% of ceiling has peeling paint or is missing paint	
	Water Stains/Water Damage/Mold/Mildew		NLT	Evidence of a leak, mold or mildew--such as a darkened area--over a ceiling area greater than 1 foot square	
Doors	Damaged Frames/Threshold/Lintels/Trim		NLT	Any door that is not functioning or cannot be locked because of damage to the frame, threshold, lintel or trim	
	Damaged Hardware/Locks		NLT	Any door that does not function as it should or cannot be locked because of damage to the door's hardware	
	Damaged/Missing Screen/Storm/Security Door		NLT	Any screen door or storm door that is damaged or is missing screens or glass--shown by an empty frame or frames or any security door that is not functioning or is missing	
	Damaged Surface - Holes/Paint/Rusting/Glass/Rotting		NLT	Any door that has a hole or holes greater than 1 inch in diameter, significant peeling/cracking/no paint or rust that affects the integrity of the door surface, or broken/missing glass	
	Deteriorated/Missing Seals (Entry Only)		NLT	The seals/caulking is missing on any entry door, or they are so damaged that they do not function as they should	

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	Missing Door		NLT	Any door that is required for security (entry) or privacy (Bathroom) that is missing or any other unit door that is missing and is required for proper unit functionality
Electrical System	Blocked Access to Electrical Panel		NLT	One or more fixed items or items of sufficient size and weight impede access to the building system's electrical panel during an emergency
	Burnt Breakers		NLT	Carbon residue, melted breakers or arcing scars are evident
	Evidence of Leaks/Corrosion		NLT	Any corrosion that affects the condition of the components that carry current or any stains or rust on the interior of electrical enclosures or any evidence of water leaks in the enclosure or hardware
	Frayed Wiring		NLT	Any nicks, abrasion, or fraying of the insulation that exposes any conducting wire
	GFI - Inoperable		NLT	The GFI does not function
	Missing Breakers/Fuses		NLT	Any open and/or exposed breaker port
	Missing Covers		LT	A cover is missing, which results in exposed visible electrical connections
Floors	Bulging/Buckling		NLT	Any flooring that is bulging, buckling or sagging or a problem with alignment between flooring types
	Floor Covering Damage		NLT	More than 10% of floor covering has stains, surface burns, shallow cuts, small holes, tears, loose areas or exposed seams.
	Missing Flooring Tiles		NLT	Any flooring or tile flooring that is missing
	Peeling/Needs Paint		NLT	Any painted flooring that has peeling or missing paint on more than 10% of the surface
	Rot/Deteriorated Subfloor		NLT	Any rotted or deteriorated subflooring greater than 6 inches by 6 inches
	Water Stains/Water Damage/Mold/Mildew		NLT	Evidence of a leak, mold or mildew--such as a darkened area--covering a flooring area greater than 1 foot square
Health & Safety	Air Quality - Mold and/or Mildew Observed		NLT	Evidence of mold or mildew is observed that is substantial enough to pose a health risk
	Air Quality - Sewer Odor Detected		NLT	Sewer odors that could pose a health risk if inhaled for prolonged periods

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	Air Quality - Propane/Natural Gas/Methane Gas Detected		LT	Strong propane, natural gas or methane odors that could pose a risk of explosion/ fire and/or pose a health risk if inhaled	
	Electrical Hazards - Exposed Wires/Open Panels		LT	Any exposed bare wires or openings in electrical panels (capped wires do not pose a risk)	
	Electrical Hazards - Water Leaks on/near Electrical Equipment		LT	Any water leaking, puddling or ponding on or immediately near any electrical apparatus that could pose a risk of fire, electrocution or explosion	
	Emergency Fire Exits - Emergency/Fire Exits Blocked/Unusable		LT	The exit cannot be used or exit is limited because a door or window is nailed shut, a lock is broken, panic hardware is chained, debris, storage, or other	
	Emergency Fire Exits - Missing Exit Signs		NLT	Exit signs that clearly identify all emergency exits are missing or there is no illumination in the area of the sign	
	Flammable Materials - Improperly Stored		NLT	Flammable materials are improperly stored, causing the potential risk of fire or explosion	
	Garbage and Debris - Indoors		NLT	Too much garbage has gathered-more than the planned storage capacity or garbage has gathered in an area not sanctioned for staging or storing garbage or debris	
	Garbage and Debris - Outdoors		NLT	Too much garbage has gathered-more than the planned storage capacity or garbage has gathered in an area not sanctioned for staging or storing garbage or debris	
	Hazards - Other		NLT	Any general defects or hazards that pose risk of bodily injury	
	Hazards - Sharp Edges		NLT	Any physical defect that could cause cutting or breaking of human skin or other bodily harm	
	Hazards - Tripping		NLT	Any physical defect in walkways or other travelled area that poses a tripping risk	
	Infestation - Insects		NLT	Evidence of infestation of insects-including roaches and ants-throughout a unit or room, food preparation or storage area or other area of building substantial enough to present a health and safety risk	
	Infestation - Rats/Mice/Vermin		NLT	Evidence of rats or mice -sightings, rat or mouse holes, or droppings substantial enough to present a health and safety risk	
Hot Water Heater	Misaligned Chimney/Ventilation System		LT	Any misalignment that may cause improper or dangerous venting of gases	

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	Inoperable Unit/Components		NLT	Hot water from hot water taps is no warmer than room temperature indicating hot water heater is not functioning properly	
	Leaking Valves/Tanks/Pipes		NLT	There is evidence of active water leaks from hot water heater or related components	
	Pressure Relief Valve Missing		NLT	There is no pressure relief valve or pressure relief valve does not drain down to the floor	
	Rust/Corrosion		NLT	Significant formations of metal oxides, flaking, or discoloration--or a pit or crevice	
HVAC System	Convection/Radiant Heat System Covers Missing/Damaged		NLT	Cover is missing or substantially damaged, allowing contact with heating/surface elements or associated fans	
	Inoperable		NLT	HVAC does not function. It does not provide the heating and cooling it should. The system does not respond when the controls are engaged	
	Misaligned Chimney/Ventilation System		LT	Any misalignment that may cause improper or dangerous venting of gases	
	Noisy/Vibrating/Leaking		NLT	The HVAC system shows signs of abnormal vibrations, other noise, or leaks when engaged	
	Rust/Corrosion		NLT	Deterioration from rust or corrosion on the HVAC system in the dwelling unit	
Kitchen	Cabinets - Missing/Damaged		NLT	10% or more of cabinet, doors, or shelves are missing or the laminate is separating	
	Countertops - Missing/Damaged		NLT	10% or more of the countertop working surface is missing, deteriorated, or damaged below the laminate -- not a sanitary surface to prepare food	
	Dishwasher/Garbage Disposal - Inoperable		NLT	The dishwasher or garbage disposal does not operate as it should	
	Plumbing - Clogged Drains		NLT	Drain is substantially or completely clogged or has suffered extensive deterioration	
	Plumbing - Leaking Faucet/Pipes		NLT	A steady leak that is adversely affecting the surrounding area	
	Range Hood/Exhaust Fans - Excessive Grease/Inoperable		NLT	A substantial accumulation of dirt or grease that threatens the free passage of air	

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	Range/Stove - Missing/Damaged/Inoperable		NLT	One or more burners are not functioning or doors or drawers are impeded or on gas ranges pilot is out and/or flames are not distributed equally or oven not functioning	
	Refrigerator- Missing/Damaged/Inoperable		NLT	The refrigerator has an extensive accumulation of ice or the seals around the doors are deteriorated or is damaged in any way which substantially impacts its performance	
	Sink - Damaged/Missing		NLT	Any cracks in sink through which water can pass or extensive discoloration over more than 10% of the sink surface or sink is missing	
Laundry Area (Room)	Dryer Vent - Missing/Damaged/Inoperable		NLT	The dryer vent is missing or it is not functioning because it is blocked. Dryer exhaust is not effectively vented to the outside	
Lighting	Missing/Inoperable Fixture		NLT	A permanent light fixture is missing or not functioning, and no other switched light source is functioning in the room	
Outlets/Switches	Missing		NLT	An outlet or switch is missing	
	Missing/Broken Cover Plates		LT	An outlet or switch has a broken cover plate over a junction box or the cover plate is missing	
Patio/Porch/Balcony	Baluster/Side Railings Damaged		NLT	Any damaged or missing balusters or side rails that limit the safe use of an area	
Smoke Detector	Missing/Inoperable		NLT	Smoke detector is missing or does not function as it should	
Stairs	Broken/Damaged/Missing Steps		NLT	A step is missing or broken	
	Broken/Missing Hand Railing		NLT	The hand rail is missing, damaged, loose or otherwise unusable	
Walls	Bulging/Buckling		NLT	Bulging, buckling or sagging walls or a lack of horizontal alignment	
	Damaged		NLT	Any hole in wall greater than 2 inches by 2 inches	
	Damaged/Deteriorated Trim		NLT	10% or more of the wall trim is damaged	
	Peeling/Needs Paint		NLT	10% or more of interior wall paint is peeling or missing	
	Water Stains/Water Damage/Mold/Mildew		NLT	Evidence of a leak, mold or mildew covering a wall area greater than 1 foot square	

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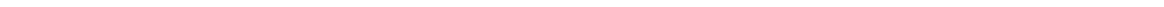
Windows	Cracked/Broken/Missing Panes		NLT	Any missing panes of glass or cracked panes of glass where the crack is either greater than 4" and/or substantial enough to impact the structural integrity of the window pane	
	Damaged Window Sill		NLT	The sill is damaged enough to expose the inside of the surrounding walls and compromise its weather tightness	
	Missing/Deteriorated Caulking/Seals/Glazing Compound		NLT	There are missing or deteriorated caulk or seals--with evidence of leaks or damage to the window or surrounding structure	
	Inoperable/Not Lockable		NLT	Any window that is not functioning or cannot be secured because lock is broken	
	Peeling/Needs Paint		NLT	More than 10% of interior window paint is peeling or missing	
	Security Bars Prevent Egress		LT	The ability to exit through the window is limited by security bars that do not function properly and, therefore, pose safety risks	

**Notes:**

1. Deficiencies identified must be labeled as "Level 1", "Level 2", or "Level 3" (including independent Health & Safety items as defined by the Final Dictionary of Deficiency Definitions (PASS) Version 2.3 dated 03/08/2000. This document can be found at [http://www.hud.gov/offices/reac/pdf/pass\\_dict2.3.pdf](http://www.hud.gov/offices/reac/pdf/pass_dict2.3.pdf) (325
2. Additional clarification to these definitions is contained in the REAC PASS Compilation Bulletin which can be found at [http://www.hud.gov/offices/reac/pdf/pass\\_bulletin.pdf](http://www.hud.gov/offices/reac/pdf/pass_bulletin.pdf) (24 pages, 275 KB)
3. Only Level 3 is applied to independent Health and Safety deficiencies
4. In the Site Specific Comments column, additional notes shall be provided identifying the level of concern to the health and safety of the deficiency.
5. Additional notes beyond the health and safety level of concern shall also be added in the Comments column as necessary defining the deficiency noted.

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Uniform Physical Condition Standards for  
Single Family Housing Rehabilitation



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[http://www.hud.gov/offices/reac/pdf/pass\\_dict2.3.pdf](http://www.hud.gov/offices/reac/pdf/pass_dict2.3.pdf).

Requirements for Site					
Inspectable Item	Observable Deficiency	Applicable/NA	NLT/LT	Type and Degree of Deficiency which Must be addressed	Site Specific Comments
Doors	Damaged Frames/Threshold/Lintels/Trim		NLT	Any door that is not functioning or cannot be locked because of damage to the frame, threshold, lintel or trim	
	Damaged Hardware/Locks		NLT	Any door that does not function as it should or cannot be locked because of damage to the door's hardware	
	Damaged Surface (Holes/Paint/Rusting/Glass)		NLT	Any screen door or storm door that is damaged or is missing screens or glass—shown by an empty frame or frames or any security door that is not functioning or is missing	
	Damaged/Missing Screen/Storm/Security Door		NLT	Any door that has a hole or holes greater than 1 inch in diameter, significant peeling/cracking/no paint or rust that affects the integrity of the door surface, or broken/missing glass	
	Deteriorated/Missing Caulking/Seals		NLT	The seals/caulking is missing on any entry door, or they are so damaged that they do not function as they should	
	Missing Door		NLT	Any door that is required for security (entry) or privacy (Bathroom) that is missing or any other unit door that is missing and is required for proper unit functionality	
Foundations	Cracks/Gaps		NLT	Large cracks in foundation more than 3/8 inches wide by 3/8 inches deep by 6 inches long that present a possible sign of a serious structural problem, or opportunity for water penetration or sections of wall or floor that are broken apart	
	Spalling/Exposed Rebar		NLT	Significant spalled areas affecting more than 10% of any foundation wall or any exposed reinforcing material—rebar or other	
Health and Safety	Electrical Hazards - Exposed Wires/Open Panels		LT	Any exposed bare wires or openings in electrical panels (capped wires do not pose a risk)	

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	Electrical Hazards - Water Leaks on/near Electrical Equipment		LT	Any water leaking, puddling or ponding on or immediately near any electrical apparatus that could pose a risk of fire, electrocution or explosion	
	Flammable/Combustible Materials - Improperly Stored		NLT	Flammable materials are improperly stored, causing the potential risk of fire or explosion	
	Garbage and Debris - Outdoors		NLT	Too much garbage has gathered-more than the planned storage capacity or garbage has gathered in an area not sanctioned for staging or storing garbage or debris	
	Hazards - Other		NLT	Any general defects or hazards that pose risk of bodily injury	
	Hazards - Sharp Edges		NLT	Any physical defect that could cause cutting or breaking of human skin or other bodily harm	
	Hazards - Tripping		NLT	Any physical defect in walkways or other travelled area that poses a tripping risk	
	Infestation - Insects		NLT	Evidence of infestation of insects-including roaches and ants-throughout a unit or room, food preparation or storage area or other area of building substantial enough to present a health and safety risk	
	Infestation - Rats/Mice/Vermin		NLT	Evidence of rats or mice-sightings, rat or mouse holes, or droppings substantial enough to present a health and safety risk	
Lighting	Broken Fixtures/Bulbs		NLT	10% or more of the lighting fixtures and bulbs surveyed are broken or missing	
Roofs	Damaged Soffits/Fascia		NLT	Soffits or fascia that should be there are missing or so damaged that water penetration is visibly possible	
	Damaged Vents		NLT	Vents are missing or so visibly damaged that further roof damage is possible	
	Damaged/Clogged Drains		NLT	The drain is damaged or partially clogged with debris or the drain no longer functions	
	Damaged/Torn Membrane/Missing Ballast		NLT	Ballast has shifted and no longer functions as it should or there is damage to the roof membrane that may result in water penetration	
	Missing/Damaged Components From Downspout/Gutter		NLT	Drainage system components are missing or damaged causing visible damage to the roof, structure, exterior wall surface, or interior	

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	Missing/Damaged Shingles		NLT	Roofing shingles are missing or damaged enough to create a risk of water penetration	
	Ponding		NLT	Evidence of standing water on roof, causing potential or visible damage to roof surface or underlying materials	
Walls	Cracks/Gaps		NLT	Any large crack or gap that is more than 3/8 inches wide or deep and 6 inches long that presents a possible sign of serious structural problem or opportunity for water penetration	
	Damaged Chimneys		NLT	Part or all of the chimney has visibly separated from the adjacent wall or there are cracked or missing pieces large enough to present a sign of chimney failure or there is a risk of falling pieces that could create a safety hazard	
	Missing/Damaged Caulking/Mortar		NLT	Any exterior wall caulking or mortar deterioration that presents a risk of water penetration or risk of structural damage	
	Missing Pieces/Holes/Spalling		NLT	Any exterior wall deterioration or holes of any size that present a risk of water penetration or risk of structural damage	
	Stained/Peeling/Needs Paint		NLT	More than 20% of the exterior paint is peeling or paint is missing and siding surface is exposed thereby exposing siding to water penetration and deterioration	
Windows	Broken/Missing/Cracked Panes		NLT	Any missing panes of glass or cracked panes of glass where the crack is either greater than 4" and/or substantial enough to impact the structural integrity of the window pane	
	Damaged Sills/Frames/Lintels/Trim		NLT	Sills, frames, lintels, or trim are missing or damaged, exposing the inside of the surrounding walls and compromising its weather tightness	
	Damaged/Missing Screens		NLT	Missing screens or screens with holes greater than 1 inch by 1 inch or tears greater than 2 inches in length	
	Missing/Deteriorated Caulking/Seals/Glazing Compound		NLT	There are missing or deteriorated caulk or seals--with evidence of leaks or damage to the window or surrounding structure	

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	Peeling/Needs Paint		NLT	More than 20% of the exterior window paint is peeling or paint is missing and window frame surface is exposed thereby exposing window frame to water penetration and deterioration	
	Security Bars Prevent Egress		LT	The ability to exit through egress window is limited by security bars that do not function properly and, therefore, pose safety risks	
Bathroom	Bathroom Cabinets - Damaged/Missing		NLT	Damaged or missing shelves, vanity tops, drawers, or doors that are not functioning as they should for storage or their intended purpose	
	Lavatory Sink - Damaged/Missing		NLT	Any cracks in sink through which water can pass or extensive discoloration over more than 10% of the sink surface or sink is missing	
	Plumbing - Clogged Drains		NLT	Drain or faucet is substantially or completely clogged or has suffered extensive deterioration	
	Plumbing - Leaking Faucet/Pipes		NLT	A steady leak that is adversely affecting the surrounding area	
	Shower/Tub - Damaged/Missing		NLT	Any cracks in tub or shower through which water can pass or extensive discoloration over more than 20% of tub or shower surface or tub or shower is missing	
	Ventilation/Exhaust System – Inoperable (if applicable)		LT	exhaust fan is not functioning or window designed for ventilation does not open	
	Water Closet/Toilet - Damaged/Clogged/Missing		NLT	Fixture elements--seat, flush handle, cover etc.--are missing or damaged or the toilet seat is cracked or has a broken hinge or toilet cannot be flushed	
Ceiling	Bulging/Buckling		NLT	Bulging, buckling or sagging ceiling or problem with alignment	
	Holes/Missing Tiles/Panels/Cracks		NLT	Any holes in ceiling, missing tiles or large cracks wider than 1/4 of an inch and greater than 6 inches long	
	Peeling/Needs Paint		NLT	More than 10% of ceiling has peeling paint or is missing paint	
	Water Stains/Water Damage/Mold/Mildew		NLT	Evidence of a leak, mold or mildew--such as a darkened area--over a ceiling area greater than 1 foot square	

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Doors	Damaged Frames/Threshold/Lintels/Trim		NLT	Any door that is not functioning or cannot be locked because of damage to the frame, threshold, lintel or trim	
	Damaged Hardware/Locks		NLT	Any door that does not function as it should or cannot be locked because of damage to the door's hardware	
	Damaged/Missing Screen/Storm/Security Door		NLT	Any screen door or storm door that is damaged or is missing screens or glass--shown by an empty frame or frames or any security door that is not functioning or is missing	
	Damaged Surface - Holes/Paint/Rusting/Glass		NLT	Any door that has a hole or holes greater than 1 inch in diameter, significant peeling/cracking/no paint or rust that affects the integrity of the door surface, or broken/missing glass	
	Deteriorated/Missing Seals (Entry Only)		NLT	The seals/caulking is missing on any entry door, or they are so damaged that they do not function as they should	
	Missing Door		NLT	Any door that is required for security (entry) or privacy (Bathroom) that is missing or any other unit door that is missing and is required for proper unit functionality	
Electrical System	Blocked Access to Electrical Panel		NLT	One or more fixed items or items of sufficient size and weight impede access to the building system's electrical panel during an emergency	
	Burnt Breakers		NLT	Carbon residue, melted breakers or arcing scars are evident	
	Evidence of Leaks/Corrosion		NLT	Any corrosion that affects the condition of the components that carry current or any stains or rust on the interior of electrical enclosures or any evidence of water leaks in the enclosure or hardware	
	Frayed Wiring		LT	Any nicks, abrasion, or fraying of the insulation that exposes any conducting wire	
	GFI - Inoperable		NLT	The GFI does not function	
	Missing Breakers/Fuses		NLT	Any open and/or exposed breaker port	
	Missing Covers		LT	A cover is missing, which results in exposed visible electrical connections	

NLT shall indicate "Non-Life Threatening"; LT shall indicate a "Life Threatening" concern which calls for immediate attention or remedy and will show up on the Exigent Health and Safety Report at the end of an inspection.

Level – Deficiencies identified must be labeled as Level 1, Level 2, or Level 3 per the REAC-defined levels of deficiency  
[http://www.hud.gov/offices/reac/pdf/pass\\_dict2.3.pdf](http://www.hud.gov/offices/reac/pdf/pass_dict2.3.pdf).

Floors	Bulging/Buckling		NLT	Any flooring that is bulging, buckling or sagging or a problem with alignment between flooring types	
	Floor Covering Damage		NLT	More than 10% of floor covering has stains, surface burns, shallow cuts, small holes, tears, loose areas or exposed seams.	
	Missing Flooring Tiles		NLT	Any flooring or tile flooring that is missing	
	Peeling/Needs Paint		NLT	Any painted flooring that has peeling or missing paint on more than 10% of the surface	
	Rot/Deteriorated Subfloor		NLT	Any rotted or deteriorated subflooring greater than 6 inches by 6 inches	
	Water Stains/Water Damage/Mold/Mildew		NLT	Evidence of a leak, mold or mildew—such as a darkened area—covering a flooring area greater than 1 foot square	
Health & Safety	Air Quality - Mold and/or Mildew Observed		NLT	Evidence of mold or mildew is observed that is substantial enough to pose a health risk	
	Air Quality - Sewer Odor Detected		NLT	Strong propane, natural gas or methane odors that could pose a risk of explosion/ fire and/or pose a health risk if inhaled	
	Air Quality - Propane/Natural Gas/Methane Gas Detected		LT	Sewer odors that could pose a health risk if inhaled for prolonged periods	
	Electrical Hazards - Exposed Wires/Open Panels		LT	Any exposed bare wires or openings in electrical panels (capped wires do not pose a risk)	
	Electrical Hazards - Water Leaks on/near Electrical Equipment		LT	Any water leaking, puddling or ponding on or immediately near any electrical apparatus that could pose a risk of fire, electrocution or explosion	
	Flammable Materials - Improperly Stored		NLT	Flammable materials are improperly stored, causing the potential risk of fire or explosion	
	Garbage and Debris - Indoors		NLT	Too much garbage has gathered-more than the planned storage capacity or garbage has gathered in an area not sanctioned for staging or storing garbage or debris	
	Garbage and Debris - Outdoors		NLT	Too much garbage has gathered-more than the planned storage capacity or garbage has gathered in an area not sanctioned for staging or storing garbage or debris	
	Hazards - Other		NLT	Any general defects or hazards that pose risk of bodily injury	

NLT shall indicate “Non-Life Threatening”; LT shall indicate a “Life Threatening” concern which calls for immediate attention or remedy and will show up on the Exigent Health and Safety Report at the end of an inspection.

Level – Deficiencies identified must be labeled as Level 1, Level 2, or Level 3 per the REAC-defined levels of deficiency  
[http://www.hud.gov/offices/reac/pdf/pass\\_dict2.3.pdf](http://www.hud.gov/offices/reac/pdf/pass_dict2.3.pdf).

	Hazards - Sharp Edges		NLT	Any physical defect that could cause cutting or breaking of human skin or other bodily harm	
	Hazards - Tripping		NLT	Any physical defect in walkways or other travelled area that poses a tripping risk	
	Infestation - Insects		NLT	Evidence of infestation of insects-including roaches and ants-throughout a unit or room, food preparation or storage area or other area of building substantial enough to present a health and safety risk	
	Infestation - Rats/Mice/Vermin		NLT	Evidence of rats or mice--sightings, rat or mouse holes, or droppings substantial enough to present a health and safety risk	
Hot Water Heater	Inoperable Unit/Components		NLT	Hot water from hot water taps is no warmer than room temperature indicating hot water heater is not functioning properly	
	Leaking Valves/Tanks/Pipes		NLT	There is evidence of active water leaks from hot water heater or related components	
	Pressure Relief Valve Missing		NLT	There is no pressure relief valve or pressure relief valve does not drain down to the floor	
	Rust/Corrosion		NLT	Significant formations of metal oxides, flaking, or discoloration--or a pit or crevice	
HVAC System	Inoperable		NLT	Cover is missing or substantially damaged, allowing contact with heating/surface elements or associated fans	
	Misaligned Chimney/Ventilation System		LT	HVAC does not function. It does not provide the heating and cooling it should. The system does not respond when the controls are engaged	
	Noisy/Vibrating/Leaking		NLT	Any misalignment that may cause improper or dangerous venting of gases	
	Rust/Corrosion		NLT	The HVAC system shows signs of abnormal vibrations, other noise, or leaks when engaged	
Kitchen	Cabinets - Missing/Damaged		NLT	Deterioration from rust or corrosion on the HVAC system in the dwelling unit	
	Countertops - Missing/Damaged		NLT	10% or more of cabinet, doors, or shelves are missing or the laminate is separating	

NLT shall indicate "Non-Life Threatening"; LT shall indicate a "Life Threatening" concern which calls for immediate attention or remedy and will show up on the Exigent Health and Safety Report at the end of an inspection.

Level – Deficiencies identified must be labeled as Level 1, Level 2, or Level 3 per the REAC-defined levels of deficiency  
[http://www.hud.gov/offices/reac/pdf/pass\\_dict2.3.pdf](http://www.hud.gov/offices/reac/pdf/pass_dict2.3.pdf).

	Dishwasher/Garbage Disposal – Leaking/Inoperable		NLT	10% or more of the countertop working surface is missing, deteriorated, or damaged below the laminate – not a sanitary surface to prepare food	
	Plumbing - Clogged Drains		NLT	The dishwasher or garbage disposal does not operate as it should	
	Plumbing - Leaking Faucet/Pipes		NLT	Drain is substantially or completely clogged or has suffered extensive deterioration	
	Range Hood/Exhaust Fans - Excessive Grease/Inoperable		NLT	A steady leak that is adversely affecting the surrounding area	
	Range/Stove - Missing/Damaged/Inoperable		NLT	A substantial accumulation of dirt or grease that threatens the free passage of air	
	Refrigerator- Missing/Damaged/Inoperable		NLT	One or more burners are not functioning or doors or drawers are impeded or on gas ranges pilot is out and/or flames are not distributed equally or oven not functioning	
	Sink - Damaged/Missing		NLT	The refrigerator has an extensive accumulation of ice or the seals around the doors are deteriorated or is damaged in any way which substantially impacts its performance	
Laundry Area (Room)	Dryer Vent - Missing/Damaged/Inoperable		NLT	The dryer vent is missing or it is not functioning because it is blocked. Dryer exhaust is not effectively vented to the outside	
Lighting	Missing/Inoperable Fixture		NLT	More than 10% of the permanent lighting fixtures are missing or damaged so they do not function	
Outlets/Switches	Missing		NLT	An outlet or switch is missing	
	Missing/Broken Cover Plates		NLT	An outlet or switch has a broken cover plate over a junction box or the cover plate is missing	
Patio/Porch/Balcony	Baluster/Side Railings Damaged		NLT	Any damaged or missing balusters or side rails that limit the safe use of an area	
Smoke Detector	Missing/Inoperable		NLT	Smoke detector is missing or does not function as it should	
Stairs	Broken/Damaged/Missing Steps		NLT	A step is missing or broken	
	Broken/Missing Hand Railing		NLT	The hand rail is missing, damaged, loose or otherwise unusable	

NLT shall indicate “Non-Life Threatening”; LT shall indicate a “Life Threatening” concern which calls for immediate attention or remedy and will show up on the Exigent Health and Safety Report at the end of an inspection.

Level – Deficiencies identified must be labeled as Level 1, Level 2, or Level 3 per the REAC-defined levels of deficiency  
[http://www.hud.gov/offices/reac/pdf/pass\\_dict2.3.pdf](http://www.hud.gov/offices/reac/pdf/pass_dict2.3.pdf).

Walls	Bulging/Buckling		NLT	Bulging, buckling or sagging walls or a lack of horizontal alignment
	Damaged		NLT	Any hole in wall greater than 2 inches by 2 inches
	Damaged/Deteriorated Trim		NLT	10% or more of the wall trim is damaged
	Peeling/Needs Paint		NLT	10% or more of interior wall paint is peeling or missing
	Water Stains/Water Damage/Mold/Mildew		NLT	Evidence of a leak, mold or mildew covering a wall area greater than 1 foot square
Windows	Cracked/Broken/Missing Panes		NLT	Any missing panes of glass or cracked panes of glass where the crack is either greater than 4" and/or substantial enough to impact the structural integrity of the window pane
	Damaged/Rotting Window Sill		NLT	The sill is damaged enough to expose the inside of the surrounding walls and compromise its weather tightness
	Missing/Deteriorated Caulking/Seals/Glazing Compound		NLT	There are missing or deteriorated caulk or seals--with evidence of leaks or damage to the window or surrounding structure
	Inoperable/Not Lockable		NLT	Any window that is not functioning or cannot be secured because lock is broken
	Peeling/Needs Paint		NLT	More than 10% of interior window paint is peeling or missing
	Security Bars Prevent Egress		LT	The ability to exit through the window is limited by security bars that do not function properly and, therefore, pose safety risks

**Notes:**

1. Deficiencies identified must be labeled as "Level 1", "Level 2", or "Level 3" (including independent Health & Safety items as defined by the Final Dictionary of Deficiency Definitions (PASS) Version 2.3 dated 03/08/2000. This document can be found at
2. Additional clarification to these definitions is contained in the REAC PASS Compilation Bulletin which can be found at [http://www.hud.gov/offices/reac/pdf/pass\\_bulletin.pdf](http://www.hud.gov/offices/reac/pdf/pass_bulletin.pdf) (24 pages, 275 KB)
3. Only Level 3 is applied to independent Health and Safety deficiencies
4. In the Site Specific Comments column, additional notes shall be provided identifying the level of concern to the health and safety of the deficiency.
5. Additional notes beyond the health and safety level of concern shall also be added in the comments column as necessary defining the deficiency noted.

NLT shall indicate "Non-Life Threatening"; LT shall indicate a "Life Threatening" concern which calls for immediate attention or remedy and will show up on the Exigent Health and Safety Report at the end of an inspection.



Grantee SF-424's and Certification(s)

OMB Number: 4343-0064  
 Expiration Date: 12/31/2010

Application for Federal Assistance SF-424		
* 1. Type of Submission: <input type="checkbox"/> Preapplication <input checked="" type="checkbox"/> Application <input type="checkbox"/> Change/Corrected Application		* 2. Type of Application: <input checked="" type="checkbox"/> New <input type="checkbox"/> Continuation <input type="checkbox"/> Revision
		* If Revision, select appropriate letter(s): <input type="text"/> * Other (Specify): <input type="text"/>
* 3. Date Received: <input type="text"/>		* 4. Applicant Identifier: <input type="text"/>
* 5a. Federal Entry Identifier: <input type="text"/>		* 5b. Federal Award Identifier: <input type="text"/>
State Use Only:		
* 6. Date Received by State: <input type="text"/>		* 7. State Application Identifier: <input type="text"/>
<b>8. APPLICANT INFORMATION:</b>		
* 8. Legal Name: <input type="text" value="State of Illinois"/>		
* b. Employer/Taxpayer Identifier Number (EIN/TIN): <input type="text" value="17-1380174"/>		* c. Organizational DUNS: <input type="text" value="8068119313000"/>
* d. Address:		
* Street1:	<input type="text" value="503 East Hancock Street"/>	
* Street2:	<input type="text"/>	
* City:	<input type="text" value="Springfield"/>	
* County/Parish:	<input type="text"/>	
* State:	<input type="text" value="IL: Illinois"/>	
* Province:	<input type="text"/>	
* Country:	<input type="text" value="USA: UNITED STATES"/>	
* Zip / Postal Code:	<input type="text" value="62701-1645"/>	
* e. Organizational Unit:		
Department Name: <input type="text" value="Ill. Commerce &amp; Economic Opport."/>		Division Name: <input type="text" value="Community Development"/>
* f. Name and contact information of person to be contacted on matters involving this application:		
* Prefix:	<input type="text" value="Mr."/>	* First Name: <input type="text" value="David"/>
* Middle Name:	<input type="text"/>	
* Last Name:	<input type="text" value="Wortman"/>	
* Suffix:	<input type="text"/>	
* Title:	<input type="text"/>	
Organizational Attention: <input type="text" value="Illinois Department of Commerce and Economic Opportunity"/>		
* Telephone Number:	<input type="text" value="217-558-4200"/>	* Fax Number: <input type="text" value="217-558-4107"/>
* Email:	<input type="text" value="David.Wortman@Illinois.gov"/>	

Application for Federal Assistance SF-424	
<p><b>* 9. Type of Applicant 1: Select Applicant Type:</b></p> <input type="text" value="State Government"/> <p>Type of Applicant 2: Select Applicant Type:</p> <input type="text"/> <p>Type of Applicant 3: Select Applicant Type:</p> <input type="text"/> <p>* Other (specify):</p> <input type="text"/>	
<p><b>* 10. Name of Federal Agency:</b></p> <input type="text" value="U.S. Department of Housing and Urban Development"/>	
<p><b>11. Catalog of Federal Domestic Assistance Number:</b></p> <input type="text" value="14-422"/> <p>CFDA Title:</p> <input type="text" value="The Community Development Block Grant Program"/>	
<p><b>* 12. Funding Opportunity Number:</b></p> <input type="text" value="Not Applicable"/> <p>* Title:</p> <input type="text" value="Not applicable. The CDBG Program is a formula grant program"/>	
<p><b>13. Competition Identification Number:</b></p> <input type="text" value="Not applicable"/> <p>* Title:</p> <input type="text" value="Not applicable. The CDBG Program is a formula grant program"/>	
<p><b>14. Areas Affected by Project (Cities, Counties, States, etc.):</b></p> <input type="text"/> <div style="display: flex; justify-content: space-around;"> <input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/> </div>	
<p><b>* 15. Descriptive Title of Applicant's Project:</b></p> <input type="text" value="Submittal of Final Statement Related to the Recipient of FFY 2019 Allocation of State Community Development Block Grant Funds"/>	
<p>Attach supporting documents as specified in agency instructions:</p> <div style="display: flex; justify-content: space-around;"> <input type="button" value="Add Attachments"/> <input type="button" value="Delete Attachments"/> <input type="button" value="View Attachments"/> </div>	

Application for Federal Assistance SF-424	
16. Congressional Districts Of:	
* a. Applicant: <input type="text" value="ALC"/>	* b. Program/Project: <input type="text" value="295"/>
Attach an additional (e) of Program/Project Congressional Districts if needed.	
<input type="text"/> <input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/>	
17. Proposed Project:	
* a. Start Date: <input type="text" value="01/01/2019"/>	* b. End Date: <input type="text" value="12/31/2019"/>
18. Estimated Funding (\$):	
* a. Federal	<input type="text" value="29,182,836.00"/>
* c. Applicant	<input type="text"/>
* c. State	<input type="text"/>
* d. Local	<input type="text"/>
* e. Other	<input type="text"/>
* f. Program Income	<input type="text"/>
* g. TOTAL	<input type="text" value="29,182,836.00"/>
* 19. Is Application Subject to Review By State Under Executive Order 12372 Process?	
<input type="checkbox"/> a. This application was made available to the State under the Executive Order 12372 Process for review on <input type="text"/>	
<input type="checkbox"/> b. Program is subject to E.O. 12372 but has not been selected by the State for review.	
<input checked="" type="checkbox"/> c. Program is not covered by E.O. 12372.	
* 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)	
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
If "Yes", provide explanation and attach	
<input type="text"/> <input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/>	
21. *By signing this application, I certify (1) to the statements contained in the Cert of certifications** and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 28, Section 1001)	
<input checked="" type="checkbox"/> ** I AGREE	
** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.	
Authorized Representative:	
Prefix: <input type="text" value="Ms."/>	* First Name: <input type="text" value="Audra"/>
Middle Name: <input type="text"/>	
* Last Name: <input type="text" value="Hamernik"/>	
Suffix: <input type="text"/>	
* Title: <input type="text" value="Executive Director, CL Reg. Development Auth."/>	
* Telephone Number: <input type="text" value="313-836-3314"/>	Fax Number: <input type="text" value="313-832-2170"/>
* Email: <input type="text" value="ALAMEEN@KREHDA.ORG"/>	
* Signature of Authorized Representative: <input type="text" value="Audra Hamernik"/>	* Date Signed: <input type="text" value="06/11/2019"/>

Application for Federal Assistance SF-424		
* 1. Type of Submission <input type="checkbox"/> Preapplication <input checked="" type="checkbox"/> Application <input type="checkbox"/> Changed/Corrected Application	* 2. Type of Application: <input checked="" type="checkbox"/> New <input type="checkbox"/> Continuation <input type="checkbox"/> Revision	* If Revision, select appropriate letter(s): <input type="text"/> * Other (Specify): <input type="text"/>
* 3. Date Received: <input type="text"/>	4. Applicant Identifier: <input type="text"/>	
5a. Federal Entity Identifier: <input type="text"/>		5b. Federal Award Identifier: <input type="text"/>
State Use Only:		
6. Date Received by State: <input type="text"/>	7. State Application Identifier: <input type="text"/>	
<b>8. APPLICANT INFORMATION:</b>		
* a. Legal Name: <input type="text" value="State of Illinois"/>		
* b. Employer/Taxpayer Identification Number (EIN/TIN): <input type="text" value="00-2758817"/>	* c. Organizational DUNS: <input type="text" value="0102925400000"/>	
d. Address:		
* Street: <input type="text" value="111 E. Wacker Drive"/>	Street2: <input type="text" value="Suite 1000"/>	
* City: <input type="text" value="Chicago"/>	County/Parish: <input type="text"/>	
* State: <input type="text" value="Illinois"/>	Province: <input type="text"/>	
* Country: <input type="text" value="USA: UNITED STATES"/>	* Zip / Postal Code: <input type="text" value="60601-4506"/>	
e. Organizational Unit:		
Department Name: <input type="text" value="Housing Development Auth."/>	Division Name: <input type="text" value="Multi-Family financing"/>	
f. Name and contact information of person to be contacted on matters involving this application:		
Prefix: <input type="text" value="Ms."/>	* First Name: <input type="text" value="Christina"/>	Middle Name: <input type="text"/>
* Last Name: <input type="text" value="Morgan"/>	Suffix: <input type="text"/>	
Title: <input type="text" value="Managing Director, Multi-family financing"/>		
Organizational Affiliation: <input type="text" value="Illinois Housing Development Authority"/>		
* Telephone Number: <input type="text" value="312-036-5273"/>	Fax Number: <input type="text" value="312-832-2167"/>	
* Email: <input type="text" value="cmorgan@ihda.org"/>		

<b>Application for Federal Assistance 5F-424</b>		
<b>* 9. Type of Applicant 1: Select Applicant Type:</b>		
<input type="text" value="State Government"/>		
<b>Type of Applicant 2: Select Applicant Type:</b>		
<input type="text"/>		
<b>Type of Applicant 3: Select Applicant Type:</b>		
<input type="text"/>		
<b>* Other (specify):</b>		
<input type="text"/>		
<b>* 10. Name of Federal Agency:</b>		
<input type="text" value="U.S. Department of Housing and Urban Development"/>		
<b>11. Catalog of Federal Domestic Assistance Number:</b>		
<input type="text" value="14-009"/>		
<b>CFDA Title:</b>		
<input type="text" value="HOME Investments Partnership Program"/>		
<b>* 12. Funding Opportunity Number:</b>		
<input type="text" value="Not applicable"/>		
<b>* Title</b>		
<input type="text" value="Not applicable. The HOME Program is a formula grant program"/>		
<b>13. Competition Identification Number:</b>		
<input type="text" value="Not applicable"/>		
<b>Title</b>		
<input type="text" value="Not applicable. The HOME Program is a formula grant program"/>		
<b>14. Areas Affected by Project (Cities, Counties, States, etc.):</b>		
<input type="text"/>	<input type="button" value="Add Attachment"/>	<input type="button" value="Delete Attachment"/>
		<input type="button" value="View Attachment"/>
<b>* 15. Descriptive Title of Applicant's Project:</b>		
<input type="text" value="The HOME Program is designed to encourage public agencies, not-for-profit entities to apply for HOME funding through HUD in order to expand the supply of decent, safe, affordable housing"/>		
<b>Attach supporting documents as specified in agency instructions.</b>		
<input type="button" value="Add Attachments"/>	<input type="button" value="Delete Attachments"/>	<input type="button" value="View Attachments"/>

**Application for Federal Assistance SF-424**

**16. Congressional Districts Of:**

\* a. Applicant:  \* b. Program/Project:

Attach an additional list of Program/Project Congressional Districts if needed.

**17. Proposed Project:**

\* a. Start Date:  \* b. End Date:

**18. Estimated Funding (\$):**

* a. Federal	<input type="text" value="15,381,165.00"/>
* b. Applicant	<input type="text"/>
* c. State	<input type="text"/>
* d. Local	<input type="text"/>
* e. Other	<input type="text"/>
* f. Program Income	<input type="text"/>
* g. TOTAL	<input type="text" value="15,381,165.00"/>

**19. Is Application Subject to Review By State Under Executive Order 12372 Process?**

a. This application was made available to the State under the Executive Order 12372 Process for review on

b. Program is subject to E.O. 12372 but has not been selected by the State for review.

c. Program is not covered by E.O. 12372.

**20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**

Yes  No

If "Yes", provide explanation and attach

**21. \*By signing this application, I certify (1) to the statements contained in the list of certifications\*\* and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances\*\* and agree to comply with any resulting terms if I accept an award. I am aware that any false, deceptive, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 28, Section 1001)**

\*\* I AGREE

\*\* The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

**Authorized Representative:**

Prefix:  \* First Name:

Middle Name:


\* Last Name:

Suffix:

\* Title:

\* Telephone Number:  Fax Number:

\* Email:

\* Signature of Authorized Representative:  \* Date Signed:

Application for Federal Assistance SF-424		
* 1. Type of Submission: <input type="checkbox"/> Preapplication <input checked="" type="checkbox"/> Application <input type="checkbox"/> Changed/Corrected Application	* 2. Type of Application: <input checked="" type="checkbox"/> New <input type="checkbox"/> Continuation <input type="checkbox"/> Revision	* If Revision, select appropriate letter (e): _____ * Other (Specify): _____
* 3. Date Received: _____	4. Applicant Identifier: _____	
5a. Federal Entity Identifier: _____	5b. Federal Award Identifier: _____	
State Use Only:		
6. Date Received by State: _____	7. State Application Identifier: _____	
8. APPLICANT INFORMATION:		
* a. Legal Name: <u>State of Illinois</u>		
* b. Employer/Taxpayer Identification Number (EIN/TIN): <u>35-2708317</u>	* c. Organizational DUNS: <u>D100055480000</u>	
d. Address:		
* Street: <u>111 E. Wacker Drive</u>	_____	
Street2: <u>Suite 1000</u>	_____	
* City: <u>Chicago</u>	_____	
County/Parish: _____	_____	
* State: <u>IL; Illinois</u>	_____	
Province: _____	_____	
* Country: <u>USA: UNITED STATES</u>	_____	
* Zip / Postal Code: <u>60601-4306</u>	_____	
e. Organizational Unit:		
Department Name: <u>IL Housing Development Auth.</u>	Division Name: <u>Multi-Family Financing</u>	
f. Name and contact information of person to be contacted on matters involving this application:		
Prefix: <u>Mr.</u>	* First Name: <u>Christina</u>	_____
Middle Name: _____	_____	
* Last Name: <u>Horan</u>	_____	
Suffix: _____	_____	
Title: <u>Managing Director, Multi-Family Financing</u>		
Organizational Affiliation: <u>Illinois Housing Development Authority</u>		
* Telephone Number: <u>312-716-5773</u>	* Fax Number: <u>312-832-2167</u>	
* Email: <u>choran@ihda.org</u>		

Application for Federal Assistance SF-424	
<p><b>* 8. Type of Applicant 1: Select Applicant Type:</b></p> <input type="text" value="A: State Government"/>	
<p>Type of Applicant 2: Select Applicant Type</p> <input type="text"/>	
<p>Type of Applicant 3: Select Applicant Type</p> <input type="text"/>	
<p>* Other (specify):</p> <input type="text"/>	
<p><b>* 10. Name of Federal Agency:</b></p> <input type="text" value="U.S. Department of Housing and Urban Development"/>	
<p><b>11. Catalog of Federal Domestic Assistance Number:</b></p> <input type="text" value="14---275"/>	
<p>CFDA Title:</p> <input type="text" value="Rational Housing Trust Fund"/>	
<p><b>* 12. Funding Opportunity Number:</b></p> <input type="text" value="Not applicable"/>	
<p>Title:</p> <input type="text" value="Not applicable. The Housing Trust Fund is a formula grant program"/>	
<p><b>13. Competition Identification Number:</b></p> <input type="text" value="Not applicable"/>	
<p>Title:</p> <input type="text" value="Not applicable. The Housing Trust Fund is a Formula Grant Program"/>	
<p><b>14. Areas Affected by Project (Cities, Counties, States, etc.):</b></p> <input type="text"/>	
<p style="text-align: right;"> <input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/> </p>	
<p><b>* 15. Descriptive Title of Applicant's Project:</b></p> <input type="text" value="The Housing Trust Fund expands and preserves the supply of affordable housing, particularly rental housing, for extremely low-income households"/>	
<p>Attach supporting documents as specified in agency instructions.</p> <p style="text-align: right;"> <input type="button" value="Add Attachments"/> <input type="button" value="Delete Attachments"/> <input type="button" value="View Attachments"/> </p>	



**Application for Federal Assistance SF-424**

**16. Congressional Districts Of:**

\* a. Applicant:  \* b. Program/Project:

Attach an additional list of Program/Project Congressional Districts if needed.

**17. Proposed Project:**

\* a. Start Date:  \* b. End Date:

**18. Estimated Funding (\$):**

* a. Federal	<input type="text" value="8,575,518.00"/>
* b. Applicant	<input type="text"/>
* c. State	<input type="text"/>
* d. Local	<input type="text"/>
* e. Other	<input type="text"/>
* f. Program Income	<input type="text"/>
* g. TOTAL	<input type="text" value="8,575,518.00"/>

**19. Is Application Subject to Review By State Under Executive Order 12372 Process?**

a. This application was made available to the State under the Executive Order 12372 Process for review on

b. Program is subject to E.O. 12372 but has not been selected by the State for review.

c. Program is not covered by E.O. 12372.

**20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**

Yes  No

If "Yes," provide explanation and attach

**21. "By signing this application, I certify (1) to the statements contained in the list of certifications" and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances" and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 28, Section 1001)**

\*\* I AGREE

\*\* The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

**Authorized Representative:**

Prefix:  \* First Name:   
 Middle Name:   
 \* Last Name:   
 Suffix:

\* Title:

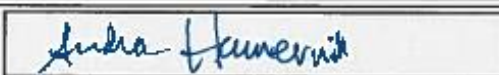
\* Telephone Number:  Fax Number:

\* Email:

\* Signature of Authorized Representative:  \* Date Signed:

Application for Federal Assistance SF-424		
* 1. Type of Submission: <input type="checkbox"/> Preapplication <input checked="" type="checkbox"/> Application <input type="checkbox"/> Changed/Corrected Application	* 2. Type of Application: <input checked="" type="checkbox"/> New <input type="checkbox"/> Continuation <input type="checkbox"/> Revision	* If Revision, select appropriate letter(s): _____ * Other (Specify): _____
* 3. Date Received: _____	4. Applicant Identifier: _____	
5a. Federal Entity Identifier: _____	5b. Federal Award Identifier: _____	
State Use Only:		
6. Date Received by State: _____	7. State Application Identifier: _____	
<b>8. APPLICANT INFORMATION:</b>		
* 8. Legal Name: <u>State of Illinois</u>		
* 9. Employer/Taxpayer Identification Number (EIN/TIN): <u>36-4162557</u>	* 9. Organizational DUNS: <u>0075190710000</u>	
<b>8. Address:</b>		
* Street1: <u>011 East Monroe Street</u>	Street2: _____	
* City: <u>Springfield</u>	County/Parish: _____	
* State: _____	IL: Illinois	
* Province: _____	Country: _____	
* Country: _____	USA: UNITED STATES	
* Zip / Postal Code: <u>62701-4815</u>	_____	
<b>e. Organizational Unit:</b>		
Department Name: <u>IL Dept. of Human Services</u>	Division Name: <u>Division, Community Services</u>	
<b>f. Name and contact information of person to be contacted on matters involving this application:</b>		
* Prefix: <u>Ms.</u>	* First Name: <u>Josalyn</u>	Middle Name: _____
* Last Name: <u>Smith</u>	* Title: <u>Manager, Emergency Solutions Grants Program</u>	
* Telephone Number: <u>217-524-8610</u> Fax Number: <u>217-524-8200</u>		
* Email: <u>josalyn.smith@illinois.gov</u>		

<b>Application for Federal Assistance SF-424</b>		
* 9. Type of Applicant 1: Select Applicant Type:		
A: State Government		
Type of Applicant 2: Select Applicant Type:		
Type of Applicant 3: Select Applicant Type:		
* Other (specify):		
* 10. Name of Federal Agency:		
U.S. Department of Housing and Urban Development		
* 11. Catalog of Federal Domestic Assistance Number:		
14-131		
CFDA Title:		
The Emergency Solutions Grants Program		
* 12. Funding Opportunity Number:		
Not applicable		
* Title:		
Not applicable. The ESG Program is a formula grant program.		
* 13. Competition Identification Number:		
Not applicable		
* Title:		
Not applicable. The ESG Program is a formula grant program.		
* 14. Areas Affected by Project (Cities, Counties, States, etc.):		
	<input type="button" value="Add Attachment"/>	<input type="button" value="Delete Attachment"/>
* 15. Descriptive Title of Applicant's Project:		
State of Illinois 2019 Emergency Solutions Grants Application Title IV Subtitle B Emergency Solutions Grants		
Attach supporting documents as specified in agency instructions.		
<input type="button" value="Add Attachments"/>	<input type="button" value="Delete Attachments"/>	<input type="button" value="View Attachments"/>

Application for Federal Assistance SF-424	
16. Congressional Districts Of:	
* a. Applicant: <input type="text" value="511"/>	* b. Program/Project: <input type="text" value="182"/>
Attach an additional list of Program/Project Congressional Districts if needed.	
<input type="text"/>	<input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/>
17. Proposed Project:	
* a. Start Date: <input type="text" value="01/01/2019"/>	* b. End Date: <input type="text" value="12/31/2019"/>
18. Estimated Funding (\$):	
* a. Federal:	<input type="text" value="4,935,064.00"/>
* b. Applicant:	<input type="text"/>
* c. State:	<input type="text"/>
* d. Local:	<input type="text"/>
* e. Other:	<input type="text"/>
* f. Program Income:	<input type="text"/>
* g. TOTAL:	<input type="text" value="4,935,064.00"/>
* 19. Is Application Subject to Review By State Under Executive Order 12372 Process?	
<input type="checkbox"/> a. This application was made available to the State under the Executive Order 12372 Process for review on <input type="text"/>	
<input type="checkbox"/> b. Program is subject to E.O. 12372 but has not been selected by the State for review.	
<input checked="" type="checkbox"/> c. Program is not covered by E.O. 12372.	
* 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)	
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
If "Yes", provide explanation and attach:	
<input type="text"/>	<input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/>
21. *By signing this application, I certify (1) to the statements contained in the list of certifications** and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 28, Section 1001)	
<input checked="" type="checkbox"/> I AGREE	
** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.	
Authorized Representative:	
Prefix: <input type="text" value="Ms."/>	* First Name: <input type="text" value="Audra"/>
Middle Name: <input type="text"/>	
* Last Name: <input type="text" value="Hamernik"/>	
Suffix: <input type="text"/>	
* Title: <input type="text" value="Executive Director, CL Esp. Development Auth."/>	
* Telephone Number: <input type="text" value="312-436-5319"/>	* Fax Number: <input type="text" value="312-432-2170"/>
* Email: <input type="text" value="AUDRA@CLERPA.ORG"/>	
* Signature of Authorized Representative: 	* Date Signed: <input type="text" value="06/11/2019"/>

Application for Federal Assistance SF-424		
* 1. Type of Submission: <input type="checkbox"/> Preapplication <input checked="" type="checkbox"/> Application <input type="checkbox"/> Changed/Corrected Application	* 2. Type of Application: <input checked="" type="checkbox"/> New <input type="checkbox"/> Continuation <input type="checkbox"/> Revision	* If Revision, select appropriate letter(s): <input type="text"/> * Other (Specify): <input type="text"/>
* 3. Date Received: <input type="text"/>	4. Applicant Identifier: <input type="text"/>	
5a. Federal Entry Identifier: <input type="text"/>	5b. Federal Award Identifier: <input type="text"/>	
State Use Only:		
6. Date Received by State: <input type="text"/>	7. State Application Identifier: <input type="text"/>	
<b>8. APPLICANT INFORMATION:</b>		
* 8. Legal Name: <input type="text" value="State of Illinois"/>		
* b. Employer/Taxpayer Identification Number (EIN/TIN): <input type="text" value="01-0632628"/>	* c. Organizational DUNS: <input type="text" value="B26601960000"/>	
d. Address:		
* Street1: <input type="text" value="523-523 West Jefferson Street"/>		
Street2: <input type="text"/>		
* City: <input type="text" value="Springfield"/>		
County/Parish: <input type="text"/>		
* State: <input type="text" value="IL: Illinois"/>		
Postal: <input type="text"/>		
* Country: <input type="text" value="USA: UNITED STATES"/>		
* Zip / Postal Code: <input type="text" value="62761-3001"/>		
e. Organizational Unit:		
Department Name: <input type="text" value="Dept. of Public Health"/>	Division Name: <input type="text" value="EIV/AIDS Section"/>	
f. Name and contact information of person to be contacted on matters involving this application:		
Prefix: <input type="text" value="Ms."/>	* First Name: <input type="text" value="Deborah"/>	
Middle Name: <input type="text"/>		
* Last Name: <input type="text" value="Grant"/>		
Suffix: <input type="text"/>		
Title: <input type="text" value="Coordinator, HIV/AIDS Section"/>		
Organizational Affiliation: <input type="text" value="Illinois Department of Public Health"/>		
* Telephone Number: <input type="text" value="217-785-5250"/>	* Fax Number: <input type="text" value="217-524-6080"/>	
* Email: <input type="text" value="deborah.grant@illinois.gov"/>		

<b>Application for Federal Assistance SF-424</b>		
<b>* 9. Type of Applicant 1: Select Applicant Type:</b> <input type="text" value="State Government"/>		
<b>Type of Applicant 2: Select Applicant Type:</b> <input type="text"/>		
<b>Type of Applicant 3: Select Applicant Type:</b> <input type="text"/>		
<b>* Other (specify):</b> <input type="text"/>		
<b>* 10. Name of Federal Agency:</b> <input type="text" value="U.S. Department of Housing and Urban Development"/>		
<b>11. Catalog of Federal Domestic Assistance Number:</b> <input type="text" value="15---111"/>		
<b>CFDA Title:</b> <input type="text" value="The HOME Program"/>		
<b>* 12. Funding Opportunity Number:</b> <input type="text" value="Not applicable"/>		
<b>* Title:</b> <input type="text" value="Not applicable. The HOME Program is a formula grant program"/>		
<b>13. Competition Identification Number:</b> <input type="text" value="Not applicable"/>		
<b>Title:</b> <input type="text" value="Not applicable. The HOME Program is a Formula Grant Program"/>		
<b>14. Areas Affected by Project (Cities, Counties, States, etc.):</b> <input type="text"/>		
<input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/>		
<b>* 15. Descriptive Title of Applicant's Project:</b> <input type="text" value="The HOME Program to provide grants to project sponsors for housing assistance and supportive services for low income persons with HIV/AIDS and their families"/>		
<b>Attach supporting documents as specified in agency instructions.</b>		
<input type="button" value="Add Attachments"/> <input type="button" value="Delete Attachments"/> <input type="button" value="View Attachments"/>		

Application for Federal Assistance SF-424

16. Congressional District Of:

\* a. Applicant:  \* b. Program/Project:

Attach an additional list of Program/Project Congressional Districts if needed.

17. Proposed Project:

\* a. Start Date:  \* b. End Date:

18. Estimated Funding (\$):

* a. Federal	<input type="text" value="1,741,535.00"/>
* b. Applicant	<input type="text"/>
* c. State	<input type="text"/>
* d. Local	<input type="text"/>
* e. Other	<input type="text"/>
* f. Program Income	<input type="text"/>
* g. TOTAL	<input type="text" value="1,741,535.00"/>

\* 19. Is Application Subject to Review By State Under Executive Order 12372 Process?

a. This application was made available to the State under the Executive Order 12372 Process for review on

b. Program is subject to E.O. 12372 but has not been selected by the State for review.

c. Program is not covered by E.O. 12372.

\* 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)

Yes  No

If "Yes", provide explanation and attach

21. "By signing this application, I certify (1) to the statements contained in the list of certifications" and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances" and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 28, Section 1001)

\*\* I AGREE

\*\* The list of certifications and assurances, or an internal site where you may enter this list, is contained in the announcement or agency specific instructions.

Authorized Representative:

Prefix:  \* First Name:

Mobile Name:


\* Last Name:

Suffix:

\* Title:

\* Telephone Number:  Fax Number:

\* Email:

\* Signature of Authorized Representative:  \* Date Signed:

ASSURANCES - CONSTRUCTION PROGRAMS

OMB Number: 4040-0009  
Expiration Date: 01/31/2019

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0340-0042), Washington, DC 20503.

**PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.**


**NOTE:** Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the Awarding Agency. Further, certain Federal assistance awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duly authorized representative of the applicant, I certify that the applicant:

1. Has the legal authority to apply for Federal assistance, and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project costs) to ensure proper planning, management and completion of project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, the right to examine all records, books, papers, or documents related to the assistance and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will not dispose of, modify the use of, or change the terms of the real property title or other interest in the site and facilities without permission and instructions from the awarding agency. Will record the Federal awarding agency directives and will include a covenant in the title of real property acquired in whole or in part with Federal assistance funds to assure non-discrimination during the useful life of the project.
4. Will comply with the requirements of the assistance awarding agency with regard to the drafting, review and approval of construction plans and specifications.
5. Will provide and maintain competent and adequate engineering supervision at the construction site to ensure that the complete work conforms with the approved plans and specifications and will furnish progressive reports and such other information as may be required by the assistance awarding agency or State.
6. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
7. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
8. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards of merit systems for programs funded under one of the 18 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
9. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4901 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
10. Will comply with all Federal statutes relating to non-discrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1681-1683, and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. §794), which prohibits discrimination on the basis of handicap; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290 dd-3 and 290 ee 3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.



11. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal and federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
12. Will comply with the provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.
13. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333) regarding labor standards for federally-assisted construction subagreements.
14. Will comply with flood insurance purchase requirements of Section 102(b) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
15. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) Implementation Plans under Section 175(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
16. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
17. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1986, as amended (16 U.S.C. §470), EO 11693 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§468a-1 et seq.).
18. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
18. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
20. Will comply with the requirements of Section 108(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL	TITLE
	Executive Director
APPLICANT ORGANIZATION	DATE SUBMITTED
Illinois Housing Development Authority	05/11/2015

ASSURANCES - CONSTRUCTION PROGRAMS

OMB Number: 4040-0009  
Expiration Date: 01/31/2019

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0042), Washington, DC 20503.

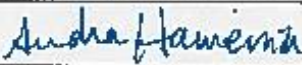
**PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.**

**NOTE:** Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the Awarding Agency. Further, certain Federal assistance awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duly authorized representative of the applicant, I certify that the applicant:

1. Has the legal authority to apply for Federal assistance, and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project costs) to ensure proper planning, management and completion of project described in the application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, the right to examine all records, books, papers, or documents related to the assistance; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will not dispose of, modify the use of, or change the terms of the real property title or other interest in the site and facilities without permission and instructions from the awarding agency. Will record the Federal awarding agency directives and will include a covenant in the title of real property acquired in whole or in part with Federal assistance funds to assure non-discrimination during the useful life of the project.
4. Will comply with the requirements of the assistance awarding agency with regard to the drafting, review and approval of construction plans and specifications.
5. Will provide and maintain competent and adequate engineering supervision at the construction site to ensure that the complete work conforms with the approved plans and specifications and will furnish progressive reports and such other information as may be required by the assistance awarding agency or State.
6. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
7. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
8. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§472B-4763) relating to prescribed standards of merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F)
9. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4601 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
10. Will comply with all Federal statutes relating to non-discrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1681, 1683, and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. §794), which prohibits discrimination on the basis of handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-256), as amended relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§280 dd-3 and 280 ee 3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.

11. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal and federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
12. Will comply with the provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.
13. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276e and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333) regarding labor standards for federally-assisted construction subagreements.
14. Will comply with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
15. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11730; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) implementation Plans under Section 178(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
16. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
17. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§468a-1 et seq.).
18. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
19. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
20. Will comply with the requirements of Section 108(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL	TITLE
	Executive Director
APPLICANT ORGANIZATION	DATE SUBMITTED
Illinois Housing Development Association	05/11/2019

ASSURANCES - CONSTRUCTION PROGRAMS

OMB Number: 4040-0009  
Expiration Date: 01/31/2019

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0340-0042), Washington, DC 20503.

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1. Has the legal authority to apply for Federal assistance, and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project costs) to ensure proper planning, management and completion of project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, the right to examine all records, books, papers, or documents related to the assistance and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will not dispose of, modify the use of, or change the terms of the real property title or other interest in the site and facilities without permission and instructions from the awarding agency. Will record the Federal awarding agency directives and will include a covenant in the title of real property acquired in whole or in part with Federal assistance funds to assure non-discrimination during the useful life of the project.
4. Will comply with the requirements of the assistance awarding agency with regard to the drafting, review and approval of construction plans and specifications.
5. Will provide and maintain competent and adequate engineering supervision at the construction site to ensure that the complete work conforms with the approved plans and specifications and will furnish progressive reports and such other information as may be required by the assistance awarding agency or State.
6. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
7. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
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9. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4901 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
10. Will comply with all Federal statutes relating to non-discrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1681-1683, and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. §794), which prohibits discrimination on the basis of handicap; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290 dd-3 and 290 ee 3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.



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13. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333) regarding labor standards for federally-assisted construction subagreements.
14. Will comply with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
15. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
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SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL	TITLE
	E. B. Lee, Acting Director
APPLICANT ORGANIZATION	DATE SUBMITTED
Department of Commerce and Economic Opportunity	June 6 2019

ASSURANCES - CONSTRUCTION PROGRAMS

OMB Number: 4040-0209  
Expiration Date: 02/28/2022

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2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, the right to examine all records, books, papers, or documents related to the assistance; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will not dispose of, modify the use of, or change the terms of the real property title or other interest in the site and facilities without permission and instructions from the awarding agency. Will record the Federal awarding agency directives and will include a covenant in the title of real property acquired in whole or in part with Federal assistance funds to assure non-discrimination during the useful life of the project.
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6. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
7. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
8. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4720-4763) relating to prescribed standards of merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Starcards for a Merit System of Personnel Administration (5 C.F.R. 300, Subpart F).
9. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
10. Will comply with all Federal statutes relating to non-discrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1681-1683, and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. §794), which prohibits discrimination on the basis of handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290 dd-3 and 290 ee 3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made, and (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.

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SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL	TITLE
 Cynthia B. Horn 4 JASTOWKE	Secretary
APPLICANT ORGANIZATION	DATE SUBMITTED
IL Dept. of Human Services	5-24-19

## ASSURANCES - CONSTRUCTION PROGRAMS

OMB Number 4240-0042  
Expiration Date 02/28/2022

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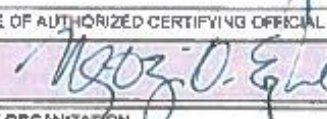
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Prescribed by OMB Circular A-102



11. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal and federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
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SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL 	TITLE <i>Director</i>
APPLICANT ORGANIZATION <i>Illinois Department of Public Health</i>	DATE SUBMITTED <i>6/10/19</i>

## STATE CERTIFICATIONS

In accordance with the applicable statutes and the regulations governing the consolidated plan regulations, the State certifies that:

**Affirmatively Further Fair Housing** – The State will affirmatively further fair housing.

**Uniform Relocation Act and Anti-displacement and Relocation Plan** – It will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, (42 U.S.C. 4601-4655) and implementing regulations at 49 CFR Part 24. It has in effect and is following a residential anti-displacement and relocation assistance plan required under 24 CFR Part 42 in connection with any activity assisted with funding under the Community Development Block Grant or HOME programs.


**Anti-Lobbying** – To the best of the State's knowledge and belief:

1. No Federal appropriated funds have been paid or will be paid, by or on behalf of it, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement;
2. If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, it will complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions; and
3. It will require that the language of paragraphs 1 and 2 of this certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly.

**Authority of State** – The submission of the consolidated plan is authorized under State law and the State possesses the legal authority to carry out the programs under the consolidated plan for which it is seeking funding, in accordance with applicable HUD regulations.

**Consistency with plan** – The housing activities to be undertaken with Community Development Block Grant, HOME, Emergency Solutions Grant, and Housing Opportunities for Persons With AIDS funds are consistent with the strategic plan in the State's consolidated plan.

**Section 3** -- It will comply with section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701u) and implementing regulations at 24 CFR Part 135.

  
Signature of Authorized Official

June 11, 2019  
Date

Executive Director, HUDA  
Title

### **Specific Community Development Block Grant Certifications**

The State certifies that:

**Citizen Participation** -- It is following a detailed citizen participation plan that satisfies the requirements of 24 CFR §91.115 and each unit of general local government that receives assistance from the State is following a detailed citizen participation plan that satisfies the requirements of 24 CFR §570.486.

#### **Consultation with Local Governments –**

1. It has consulted with affected units of local government in the nonentitlement area of the State in determining the method of distribution of funding;
2. It engages in or will engage in planning for community development activities;
3. It provides or will provide technical assistance to units of local government in connection with community development programs; and
4. It will not refuse to distribute funds to any unit of general local government on the basis of the particular eligible activity selected by the unit of general local government to meet its community development needs, except that a State is not prevented from establishing priorities in distributing funding on the basis of the activities selected.

**Local Needs Identification** – It will require each unit of general local government to be funded to identify its community development and housing needs, including the needs of low-income and moderate-income families, and the activities to be undertaken to meet these needs.

**Community Development Plan** – Its consolidated plan identifies community development and housing needs and specifies both short-term and long-term community development objectives that have been developed in accordance with the primary objective of the CDBG program (i.e., the development of viable urban communities, by providing decent housing and expanding economic opportunities, primarily for persons of low and moderate income) and requirements of 24 CFR Parts 91 and 570.

**Use of Funds** -- It has complied with the following criteria:

1. **Maximum Feasible Priority.** With respect to activities expected to be assisted with CDBG funds, it has developed its Action Plan so as to give maximum feasible priority to activities which benefit low and moderate income families or aid in the prevention or elimination of slums or blight. The Action Plan may also include activities which the grantee certifies are designed to meet other community development needs having particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community, and other financial resources are not available.
  2. **Overall Benefit.** In the aggregate, not less than 70 percent of the CDBG funds, including Section 108 guaranteed loans, received by the State during the following fiscal year(s) 2019 [a period designated by the State of one, two, or three specific consecutive fiscal year(s)] will be used for activities that benefit persons of low and moderate income.
-

3. **Special Assessments.** It will not attempt to recover any capital costs of public improvements assisted with CDBG Funds, including Section 108 loan guaranteed funds, by assessing any amount against properties owned and occupied by persons of low and moderate income, including any fee charged or assessment made as a condition of obtaining access to such public improvements.

However, if CDBG funds are used to pay the proportion of a fee or assessment that relates to the capital costs of public improvements (assisted in part with CDBG funds) financed from other revenue sources, an assessment or charge may be made against the property with respect to the public improvements financed by a source other than CDBG funds.

In addition, in the case of properties owned and occupied by moderate-income (not low-income) families, an assessment or charge may be made against the property for public improvements financed by a source other than CDBG funds if the jurisdiction certifies that it lacks CDBG funds to cover the assessment.

**Excessive Force** -- It will require units of general local government that receive CDBG funds to certify that they have adopted and are enforcing:

1. A policy prohibiting the use of excessive force by law enforcement agencies within its jurisdiction against any individuals engaged in non-violent civil rights demonstrations; and
2. A policy of enforcing applicable State and local laws against physically barring entrance to or exit from a facility or location which is the subject of such non-violent civil rights demonstrations within its jurisdiction.

**Compliance with Anti-discrimination laws** -- The grant will be conducted and administered in conformity with title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d) and the Fair Housing Act (42 U.S.C. 3601-3619) and implementing regulations.

**Compliance with Laws** -- It will comply with applicable laws.

  
Signature of Authorized Official

June 11, 2019  
Date

Executive Director, IHDA  
Title

**Specific HOME Certifications**

The State certifies that:

**Tenant Based Rental Assistance** -- If it plans to use HOME funds for tenant-based rental assistance, tenant-based rental assistance is an essential element of the State's consolidated plan.

**Eligible Activities and Costs** -- It is using and will use HOME funds for eligible activities and costs, as described in 24 CFR §92.205 through §92.209 and that it is not using and will not use HOME funds for prohibited activities, as described in §92.214.

**Subsidy Layering** -- Before committing any funds to a project, the State or its recipients will evaluate the project in accordance with the guidelines that it adopts for this purpose and will not invest any more HOME funds in combination with other Federal assistance than is necessary to provide affordable housing.

  
Signature of Authorized Official

June 11, 2019  
Date

Executive Director, THDA  
Title



### **Emergency Solutions Grant Certifications**

Each State that seeks funding under the Emergency Solutions Grants Program must provide the following certifications:

**Matching Funds** – The State will obtain any matching amounts required under 24 CFR 576.201 in a manner so that its subrecipients that are least capable of providing matching amounts receive the benefit of the exception under 24 CFR 576.201 (a)(2).

**Discharge Policy** – The State will establish and implement, to the maximum extent practicable and where appropriate, policies and protocols for the discharge of persons from publicly funded institutions or systems of care (such as health care facilities, mental health facilities, foster care or other youth facilities, or correction programs and institutions) in order to prevent this discharge from immediately resulting in homelessness for these persons.

**Confidentiality** – The State will develop and implement procedures to ensure the confidentiality of records pertaining to any individual provided family violence prevention or treatment services under any project assisted under the ESG program, including protection against the release of the address or location of any family violence shelter project, except with the written authorization of the person responsible for the operation of that shelter.

The State will ensure that its subrecipients comply with the following criteria:

**Major rehabilitation/conversion/renovation** – If an emergency shelter's rehabilitation costs exceed 75 percent of the value of the building before rehabilitation, the building will be maintained as a shelter for homeless individuals and families for a minimum of 10 years after the date the building is first occupied by a homeless individual or family after the completed rehabilitation. If the cost to convert a building into an emergency shelter exceeds 75 percent of the value of the building after conversion, the building will be maintained as a shelter for homeless individuals and families for a minimum of 10 years after the date the building is first occupied by a homeless individual or family after the completed conversion. In all other cases where ESG funds are used for renovation, the building will be maintained as a shelter for homeless individuals and families for a minimum of 3 years after the date the building is first occupied by a homeless individual or family after the completed renovation.

**Essential Services and Operating Costs** – If ESG funds are used for shelter operations or essential services related to street outreach or emergency shelter, the subrecipient will provide services or shelter to homeless individuals and families for the period during which the ESG assistance is provided, without regard to a particular site or structure, so long the applicant serves the same type of persons (e.g., families with children, unaccompanied youth, veterans, disabled individuals, or victims of domestic violence) or persons in the same geographic area.

**Renovation** – Any renovation carried out with ESG assistance shall be sufficient to ensure that the building involved is safe and sanitary.

**Supportive Services** – The subrecipient will assist homeless individuals in obtaining permanent housing, appropriate supportive services (including medical and mental health treatment, counseling, supervision, and other services essential for achieving independent living), and other Federal, State, local, and private assistance available for such individuals.

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**Homeless Persons Involvement** – To the maximum extent practicable, the subrecipient will involve, through employment, volunteer services, or otherwise, homeless individuals and families in constructing, renovating, maintaining, and operating facilities assisted under ESG, in providing services assisted under the ESG program, and in providing services for occupants of facilities assisted ESG.

**Consolidated Plan** – All activities the subrecipient undertakes with assistance under ESG are consistent with the State's current HUD-approved consolidated plan.

  
\_\_\_\_\_  
Signature of Authorized Official

June 11, 2019  
\_\_\_\_\_  
Date

Executive Director, IHDA  
\_\_\_\_\_  
Title

**Housing Opportunities for Persons With AIDS Certifications**

The State HOPWA grantee certifies that:

**Activities** -- Activities funded under the program will meet urgent needs that are not being met by available public and private sources.

**Building** -- Any building or structure assisted under the program shall be operated for the purpose specified in the consolidated plan:

1. For a period of not less than 10 years, in the case of any building or structure purchased, leased, rehabilitated, renovated, or converted with HOPWA assistance,
2. For a period of not less than 3 years, in the case of assistance involving non-substantial rehabilitation or repair of a building or structure.



Signature of Authorized Official

June 11, 2019

Date

Executive Director, IHDA

Title

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**APPENDIX TO CERTIFICATIONS**

**INSTRUCTIONS CONCERNING LOBBYING CERTIFICATION:**

**Lobbying Certification**

This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

