

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 federal 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. On June 16, 1994, Governor Edgar designated the Illinois Housing Development Authority (IHDA) as the lead agency in developing the Consolidated Plan. IHDA's Strategic Planning and Reporting (SPAR) has primary responsibility for coordinating, developing and distributing the Plan, and receives input from the 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, creating the Housing Task Force to improve the planning and coordination of the State's housing resources. 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 representatives from State agencies and the housing community. The identification of the following eight underserved populations in the Executive Order provides specificity to the State's housing priorities:

- Low-income Households (with 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 effort
- 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.

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The State notes, that at the time of the publication of the draft 2021 Action Plan, actual funding amounts for the federal Housing Trust Fund had not yet been published by HUD. HUD addressed this issue in HUD CPD Notice 21-02. As provided below, the State developed an amendment to the draft 2021 Consolidated Plan for the national Housing Trust Fund once the actual allocation amount were available.

CDBG Program Amendment for the 2021 Action Plan

On May 20, 2021, the U.S. Department of Housing and Urban Development notified the Illinois Department of Commerce and Economic Opportunity that the previously announced Community Development Block Grant allocation for 2021 was incorrect. The State of Illinois' allocation has increased to \$31,038,073 from \$30,587,443. The increase of \$450,630 has been added to Disaster Response funding, as funding for this program had been decreased over 2020. Edits to reflect this change have been made in the Illinois Action Plan areas of: AP15, AP20, AP30.

In accordance with 24 CFR 5.110 HUD has determined good cause within statutory limitations to waive regulatory provisions. Per a memorandum from James Arthur Jenison II, Principal Deputy Assistant Secretary of HUD, the Citizen Participation Public Comment Period for the aforementioned change in the Action Plan has been reduced to three days. The public comment period for the change in 2021 allocation begins Tuesday, May 25, 2021 and ends Thursday, May 27, 2021. Comments may be addressed to the Illinois Department of Commerce and Economic Opportunity through e-mail at ceo.ocd@illinois.gov. You also have the opportunity to address this action at a Public Hearing to be held on Wednesday, May 26, 2021 at 10:30 am. The Hearing will be held virtually and can be accessed at the following link: <https://illinois2.webex.com/illinois2/j.php?MTID=mc3cfafef4db2f94b5a4ae6ca25bd5ed7>. The Meeting ID is: 133 156 8117; the meeting password is 4qnGfX3vY7s.

Submission Process for the Housing Trust Fund (HTF) Program

The State notes, that at the time of the publication of the draft 2021 Action Plan, actual funding amounts for the federal Housing Trust Fund had not yet been published. HUD addressed this issue in HUD CPD Notice 21-02. In Part II, the Notice states:

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II. Submission Process for the Housing Trust Fund (HTF) Program

HTF is an affordable housing production program to increase and preserve the supply of decent, safe, and sanitary affordable housing for extremely low-income and very low-income families. See 24 CFR part 93. HTF is a formula grant program for states.

The HTF regulation at 24 CFR 93.100 requires each state to include its HTF allocation plan in its annual Action Plan as described at 24 CFR 91.320(k)(5). The HTF allocation plan describes the method for the distribution of funds, and establishes the application requirements and criteria for selecting applications. The rule also requires a local jurisdiction that receives a subgrant of HTF funds from the state to include a HTF allocation plan (24 CFR 91.220(l)(5)) in its annual Action Plan, but due to the timing of the publication of HTF allocations, the local jurisdiction may need to amend its annual Action Plan to include HTF.

The timing of the HTF allocations is different from other CPD formula programs (CDBG, HOME, HOPWA, and ESG) because the source of funding is the mandatory assessments on Fannie Mae and Freddie Mac rather than Federal appropriations. The earliest HUD expects to publish the HTF allocations is April 2021. If HTF allocations are not published before a state submits its Consolidated Plan/Action Plan, a state may submit its Consolidated Plan/Action Plan for the other CPD formula programs, then submit its HTF allocation plan as a substantial amendment to its annual Action Plan, after the HTF allocations are published.

The State devised an amendment to the draft 2021 Consolidated Plan for the purpose of its 2021 allocation funding under the national Housing Trust Fund.

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

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3. Evaluation of past performance

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

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.

The most recent letter is on file with and available through IHDA's Strategic Planning and Reporting/Compliance and Reporting. Points of note, by program, are below:

Evaluation of Past Performance HTF

The Illinois Housing Development Authority received the HUD PY-End Review Letter dated August 8, 2019 and subsequently released to the State on September 4, 2019

Housing Trust Fund- HUD requested an explanation on the lack of progress for HTF goals reported in the 2018 Performance Evaluation Report

IHDA HTF Response:

At the time of the submission of the 2018 annual progress report, 2017 HTF funds had been committed but no funds drawn down and/or expended. Since submission of the 2018 Annual Progress Report, the 2016 HTF funds have been fully committed and \$3,701,088.61 has been drawn down and are on track to be fully expended by January 11, 2023. With respect to the 2017 HTF funds, \$6,447,138 have been Board approved. With respect to the 2018 HTF funds, the State plans to award funds through the Permanent Supportive Housing Development Program. Funding will be awarded to the highest scoring applications that have met all mandatory criteria. Applications may be submitted to IHDA until October 18, 2019 at 5:00 p.m. The State's estimated goals for the HTF program are based on the assumption that there will be a ratio of 60 percent to 40 percent of annual funding between new construction and rehab. Similar to HOME, actual numbers are determined by the type of applications received and the quality of the applications approved.

HOME and NSP

HOME and HTF - HUD identified items in the Year End Letter that the State needed to provide explanation for regarding uncommitted funds and lack of disbursements involving HOME and HTF projects

Regarding HOME and HTF Funds, please see updated information below.

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Evaluation of Past Performance continued: HOME (2)

Part II: Management of Funds

With respect to expended HOME Program Income reported by the State in the 2018 PER, total expended HOME Program Income in Program Year 2018 was \$5,911,133.93.

As of September 23, 2019, the State had zero balance remaining in 2012 HOME funds, per IDIS. The State is currently drawing funds from Fiscal Year 2016. Further consultation with HUD confirmed there were no remaining 2012 HOME funds set to expire or be recaptured.

With respect to the HOME Flagged Activities Report, the Authority's Compliance & Reporting Group reviews this report monthly in an effort to help ensure that all activities are completed within the required 120 days after all funds are drawn. In the chart below see updates to the flagged activities as of September 26, 2019.

Note: Further consultation with HUD confirmed that the Exceptions Report and HOME Open Activities Report in Appendix B of the Program Year-End Review Letter received on September 4, 2019, have their headings switched

Evaluation of Past Performance continued: NSP

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 NSP response

NEIGHBORHOOD STABILIZATION PROGRAM OBLIGATIONS AND EXPENDITURES

As of September 30, 2019, IHDA has grant funds remaining for NSP 1 in the amount of \$1,659,775.35 and Program Income of \$16,222.50 and for NSP 3, \$385,617.56 in Grant Funds and \$28,500 in Program Income. Kane County was awarded NSP3 funds in 2016 and there is a balance of \$95,889.86 to be drawn.

The remainder of the State's NSP funds have been awarded to a project by IHDA's Board in July 2019 in the amount of \$1,994,226.14 and this will use the remaining NSP 1 & 3 funds and then IHDA will close out NSP. The State is continuing to work with a TA provider with the goal of inputting all the beneficiary data entered into DRGR.

General Program Compliance

Previously, both HUD and State of Illinois staff have noted that in some instances, information inputted to and saved within the IDIS E-conplanning system does not transfer when the document is downloaded. The State reviewed the document within the IDIS-E-conplanning system, as it was submitted to HUD on May 31, 2019. This review verified that this is what has happened regarding the

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2018 State of Illinois PER. The information did not appear in a downloaded, printed copy of the template. However, the narrative information (as well as the chart prepared for CR 40 regarding “the description of standards and procedures used to monitor activities carried out in furtherance of the plan and used to ensure long-term compliance with requirements of the program involved”) was inputted into the IDIS E-Conplanning system. The information does appear when directly reviewing the document screens while in the IDIS E-conplanning system. Also included within an additional text box is the text of the Public Notice for the Public Hearing of the Draft 2018 Annual Performance Report. **When this process was repeated, inexplicably, the information did not appear in the text boxes, BUT, when the close button for the screen page was used, the narrative appeared, just prior to the page actually closing.** After this, when the State re-opened the page, the narrative did appear in the document signified on the AD-25 as “Submitted for Review” in the system. The State cannot explain this anomaly within the IDIS system

Evaluation of Past Performance continued: ESG

The Illinois Department of Human Services, Emergency Solutions Grant (ESG) Program Manager received HUD’s “Program Year-End Review Letter”.

Part I: Summary of Planning and Reporting Documents

2015-2019 Consolidated Plan

“The narrative and accomplishments reported in the PER reflect that the State of Illinois might be experiencing challenges in meeting some of the goals and objectives of its 5 year Strategic Plan. Please provide an explanation for the lack of progress for any goal that is below 80% complete.”

At the submission of the 2018 APR to HUD, the state had noted:

“Due to the generation of incomplete/inaccurate goal and outcome info to the Accomplishment Table for Action Plan Year 2018, please see the edited table "Corrected Table for 2018 Action Plan Goals and Accomplishment for HOME, NHTF, ESG and HOPWA" at the end of the section, as it appeared in the Draft 2018 Annual Performance Report distributed for public comment. The table at the end of CR-05 contains the accurate Goal and Outcome Indicators info for activities under the 2018 Action Plan for the HOME, HOPWA, ESG and HTG programs. CDBG information did generate accurately into the Table immediately below”

The corrected chart for 2018, then attached with the submitted 2018 APR included the following recorded for ESG

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Table 1 - Corrected Table for 2018 Action Plan Goals and Accomplishment for ESG							
GOAL	CATEGORY	SOURCE	INDICATOR	UNIT of MEASURE	EXPECTED 2018 PY	ACTUAL 2018 PY	PERCENT COMPLETE
Prevent Homelessness	Homeless	ESG	Homelessness Prevention	Persons Assisted	60	430	716.67%
Provide emergency shelter to homeless	Homeless	ESG	Homeless Person Overnight Shelter	Persons Assisted	16000	24816	155.10%
Rapid Rehousing of Homeless	Homeless	ESG	TBRA/RRH	Household Asst	1535	1809	117.85%
Street Outreach to Homeless	Homeless	ESG	Other	Other	1500	1864	124.27%
The PR-02 Reports for years 2015-2017 (as of 3-27-19) are attached to this Year-End- Letter reply, as documentation of ESG Activities over the first three years of the 2015-2019 Consolidated Plan.							

Evaluation of Past Performance continued: ESG 3

Program Expenditures

It states that the State has \$436,988.29 available to draw from 2017 ESG funds. ESG staff has personally contacted each agency Chief Financial Officer (CFO) and Continuum of Care leads to ensure that the funds would be expense within the time frame allowed. If the CFO indicated uncertainty, the funds were reallocated. In most cases, the agencies already expensed the funds; they just needed to enter their receipts into the ESG Program (EST) system.

The remaining Illinois Administration funding in the amount of \$11,207.45 has already been expended and is waiting for receipt transmittal for funding to be drawn from Integrated Disbursement Information System (IDIS). All agencies have given their guarantee that the HUD 2017 funds will be expensed prior to the deadline of October 19, 2019. IDHS ESG staff will be held accountable for certifying, approving payments, and completing the IDIS drawdown. It is my understanding that the department will have 90 days to reflect these expenditures in IDIS.

As of [October 2, 2019], the amount stated above has been greatly reduced to \$279,258.70 and Illinois is on target to spend the remaining 2017 ESG funds prior to the deadline.

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Evaluation of Past Performance continued: HOPWA

The Illinois Department of Public Health administers the Housing Opportunity for People with HIV/AIDS (HOPWA). The Illinois Department of Public Health (IDPH), HIV/AIDS Section, as State coordinator for HUD's Housing Opportunities for Persons with AIDS program (HOPWA) is in receipt of the Program Year-End Review Letter released by HUD to the State on September 4, 2019. The State HOPWA program has addressed the deficiency in not using prior year funding. The rehabilitation and repair scope of service was not completed in 2018 due to delays in the process for environment review that required environmental reviews to be completed before grantee's repairs were completed. It should be noted that the Department has expended all prior year funding. The Program is currently on track to expend all this funding for rehabilitation dollars by the end of December 2020. We are committed to providing housing to persons living with HIV and feel that the Department's activities are consistent with the Consolidated Plan and the operating regulations for the HOPWA program.

Northtown Apartments, MHR 11488	\$10,000 remaining to draw
HOME IHDA FY18	Completed in IDIS on 1/16/19
NHTF Admin FY17	Completed in IDIS 1/16/19
Edward Brown and Turlington West	In process.
Arboretum West	Completed in IDIS 8/22/2019
Marison Mills Suites	\$10,000 remaining to draw
Cary Senior Living	\$10,000 remaining to draw
Wisdom Village or Northlake II	\$10,000 remaining to draw
Chelsea Senior Commons	In process
NHTF Admin FY18	Currently drawing FY17 funds

Table 1 - Regarding HOME and HTF funds - Updated Information Sept. 26, 2019 Response

Orton Keys, 13380	There is \$10,000.00 remaining to be drawn and these funds will be used at the last construction draw. Construction is at 100%. Final draw is expected prior to November.
Spring Hill, 13453	There is \$10,000.00 remaining to be drawn and these funds will be used at the last construction draw. Construction is at 89%.

Table 2 - HOME Flagged Activity Report - Sept. 26, 2019 Response

Evaluation of Past Performance continued: HOPWA 2

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4. Summary of Citizen Participation Process and consultation process

Summary from citizen participation section of plan.

The Citizen Participation Plan centers around the public hearing and public comments processes. Because of the COVID-19 pandemic, and subsequent HUD waivers to prevent the spread of the contagion, The State held one public hearing on Wednesday, April 14, 2021 at 10:30 A.M. via Web-ex. The Public Comment period began Friday March 19, 2021 and ended Monday April 19, 2021.

- A 2021 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. Emails were also sent to the members of the Advisory Committee and CDBG Entitlement Grantees
- The Public Notice was published prior to these hearings in the following nine (9) newspapers: *Belleville News Democrat; Breeze Courier; Champaign News-Gazette; Daily Southtown; Peoria Journal-Star; The Dispatch Argus; Rockford Register Star; Southern/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)
- Notification of the availability of the draft 2021 Consolidated Plan-Action Plan was emailed to organizations and interested parties across the State. Notification was sent to the 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.
- Notification of the date, time, and web/link for the Public Hearing was included in discussion at the Advisory Committee Meeting held the day before the Public Hearing
- The public hearing was held during the 30-day public comments period via Web-ex. The date for the hearing, April 14, 2021, was also posted on IHDA's web-site
- The agenda for the public hearing is included below
- 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. The minutes of the AC meeting the day prior are also included
- No public comments letters were received during the public comments period.
- The development of both the Citizen Participation Plan and Consolidated Plan provided ample opportunity for the public to provide comments

The State also held additional public comments periods for the Housing Trust Fund and the Community Block Grant Program. The comments period for the HTF program ran from May 3, 2021 to June 1, 2021. As explained elsewhere in this Executive Summary, the thirty-day public comment period for the CDBG

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was waived by HUD, in lieu of a three day public comments period. The CDBG public comments period ran from May 25, 2021 until May 27, 2021. Information to this was posted on both the DCEO and IHDA websites, and distributed via email by both DCEO and IHDA. The public hearing for the CDBG changes was combined into the public hearing for the HTF amendment. No public comments were received.

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 to Action Plan

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 five 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.
- (4) Major change(s) due to disaster and/or emergency funding, where timeliness in meeting emergency needs is a priority. The State will follow any HUD waiver(s) and guideline(s) to abridge and shorten the citizen participation component, such as reducing the duration of the public comments period, per official guidance; and in cases of public health emergency, the State will utilize alternate methods in lieu of holding in-person meetings and hearings.
 - In any of the above cases, this citizen participation plan will require that public notification occur per the following: notification to OHCS Advisory Committee, various State Agencies Housing, and additional housing-related organizations, to inform them of the proposed amendment and provide for a 30-day (or in case of emergency/public health crisis, an expedited) public comments period; and publication of press releases and public notices, and mailings, as is appropriate, to affected parties.
- (5) 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.

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April 14 Public Hearing Agenda 2021 AP

Public Hearing Call in and Agenda
For the State of Illinois
State of Illinois Consolidated Plan-Draft 2021 Action Plan

Wednesday, April 14, 2021 @ 10:30 A.M.

Public Hearing Call-in/Log-in

The day of the hearing, access the hearing information by following the link:

<https://illinois2.webex.com/illinois2/j.php?MTID=m756ed5ab5a25b483a247e8bf38829eb2>

This link will also be posted on the IHDA website.

The Meeting ID is: 133 331 8534 ; the meeting code is 554P39vpVeV

Audio Information

When joining the meeting, you will be prompted to select how to connect to the audio call. Callers can have the meeting call them back, in which case, callers will enter their phone number and the meeting will call them directly. This is recommended.

Callers can also choose the option to call into the meeting. The meeting will then give them the phone number to call and access code to enter.

There is a global call in number of 1-415-655-0003. The access code for this number is the same as the meeting ID. This is not a toll-free number.

Agenda

- Welcome and Introductions/Overview of Agenda – Reporting and Compliance, Strategic Planning and Reporting (RC-SPAR) 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 2021 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

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Public Hearing Call in and Agenda for the Housing Trust Fund [and Amendment/Changes to State of Illinois Consolidated Plan-Draft 2021 Action Plan

Wednesday, May 26, 2021 at 10:30 A.M

Public Hearing Call-in/Log-in

The day of the hearing, access the hearing information by following the link:

<https://illinois2.webex.com/illinois2/j.php?MTID=mc3cfafef4db2f94b5a4ae6ca25bd5ed7>

This link will also be posted on the IHDA website

The Meeting ID is: 133 156 8117; the meeting password is 4qnGfX3vY7s

Agenda

- Welcome and Introductions/Overview of Agenda – Reporting and Compliance, Strategic Planning and Reporting (RC-SPAR) Illinois Housing Development Authority (IHDA)
- Historical Overview of the State Consolidated Plan; Citizen Participation Process; State Priorities – The Comprehensive Housing Plan Act (P.A. 94-965) and the Annual Comprehensive Housing Plan _IHDA
- State's Amendment to the Draft 2021 Action Plan for the federal Housing Trust Fund (HTF) - IHDA
- Public Comments/Testimony/Question and Answer Period on the federal Housing Trust Fund and comments relating to Other HUD Formula Funding Programs:
 - Community Development Block Grant (CDBG) and the Non-Housing Community Development Plan - Illinois Department of Commerce and Economic Opportunity (DCEO)
 - DCEO received notice from HUD on May 20th that the CDBG allocation had increased to \$31,038,073 from \$30,587,443 as previously notified on 3/24/21. The increase of \$450,630 was added to Disaster Response funding. Edits to reflect this change have been made in the Action Plan areas of: AP15, AP20, AP30.
 - HOME Investment Partnerships Program – 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
- Adjournment

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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 State held two Public Comments periods for the 2021 Action Plan. The first, on April 14, 2021 covered the CDBG, HOME, ESG and HOPWA program. No public comments were received.

The second public comments period was held, per the guidance provided by HUD, to include the HTF allocation into the 2021 Action Plan, and for the correction to the 2021 CDBG allocation amount, as described above. No public comments were received.

Also, on May 20, 2021, the U.S. Department of Housing and Urban Development notified the Illinois Department of Commerce and Economic Opportunity that the previously announced Community Development Block Grant allocation for 2021 was incorrect. The State of Illinois' allocation increased to \$31,038,073 from \$30,587,443. The increase of \$450,630 has been added to Disaster Response funding, as funding for this program had been decreased over 2020. Edits to reflect this change were made in the Action Plan areas of: AP15, AP20, AP30, with the proposed changes posted to both the IHDA and DCEO websites.

In accordance with 24 CFR 5.110 HUD determined good cause to waive regulatory provisions. Per a memorandum from James Arthur Jenison II, Principal Deputy Assistant Secretary of HUD, the Citizen Participation Public Comment Period for the aforementioned change in the Action Plan was reduced to three days. The public comment period for the change in CDBG 2021 allocation began Tuesday, May 25, 2021 and ended Thursday, May 27, 2021. The public hearing for this changes was held simultaneously with the Public Hearing for the HTF changes, allowing participants to address questions and comments relating to all five formula grant programs.

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

Not applicable

7. Summary

A minimum of two public hearing are held twice a year, for both the Annual Action Plan, and the Annual Performance Report. The Public Hearing for the Annual Performance Report will coincide with the public comments period for the 2020 Performance Evaluation Report. As explained above, two public hearings were held for the 2021 Action Plan.

In addition to the public hearings, SPAR schedules meetings of the 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 meetings was held April 13, 2021, the day before the public hearing. Minutes of scheduled meetings are available upon request to the Strategic Planning and Reporting Department. Minutes of the April 13, 2021 Advisory Committee are attached to the plan.

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PR-05 Lead & Responsible Agencies - 91.300(b)

1. Agency/entity responsible for preparing/administering the Consolidated Plan

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

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

Table 1 – Responsible Agencies

Narrative

Lead Agency Designation

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

The Comprehensive Housing Plan Act (P.A. 94-965) issued on June 30, 2006, established the State of Illinois' 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 had been historically addressed by the State Consolidated Plan, they have been so on a voluntary, administrative basis rather than with legislative or executive (Governor's) mandate. The identification of underserved populations in the Act provides more specificity to the State's housing priorities.

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.

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Consolidated Plan Public Contact Information

Illinois Department of Commerce and Economic Opportunity (CDBG)

500 E. Monroe
Springfield, Illinois 62701
Contact: Wendy Bell
Ph: 217/558-4200 Fax: 217/558-4107
Alternate: Kara Cozadd

Illinois Housing Development Authority (HOME and HTF)

111 E. Wacker Drive
Suite 1000
Chicago, IL 60601
Contact: Burton Hughes
Ph: 312/836-5320 Fax: 312/832-2191
Alternate: Deirdre Kenny

Illinois Department of Human Services (ESG)

823 E. Monroe
Springfield, IL 62701
Contact: Josalyn Smith
Ph: 217/524-8612 Fax: 217/524-6248

Illinois Department of Public Health (HOPWA)

535 W. Jefferson
Springfield, IL 62761

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

Tricia Patterson
Ph: 217/524-5983 Fax: 217/785-8013

Contact (Division of Environmental Health):

Kert McAfee
Ph: 217/557-4519 Fax: 217/785-0253

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

1. Introduction

The State consulted the following major advisory bodies:

- Strategic Planning and Reporting (SPAR) Advisory Committee - This is an advisory group to 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. SPAR 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 SPAR Advisory Committee, the Housing Task Force, and the state's Affordable Housing (Trust Fund) Advisory Commission.

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.

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 applications under HUD's programs in order to provide Certifications of Consistency with the State's Consolidated Plan

The Homelessness Interagency Work Group (HIWG) was formed in April 2020 as a collaborative effort among multiple State agencies to address the following issues:

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- Coordinate and monitor the State's response to individuals experiencing homelessness during the COVID-19 crisis;
- Assess the impact of that response and plan for ongoing needs of individuals experiencing homelessness;
- Identify the specific needs of individuals leaving the Illinois Department of Corrections and the ex-offender population; and
- Explore strategies to bring more flexible resources to bear on homelessness prevention and housing stability in the months ahead.

The Workgroup met throughout 2020. In addition to the established goals, the Workgroup commissioned a third-party study from University of Illinois at Chicago and Southern Illinois University to determine how many households were vulnerable from the COVID-19 pandemic, analyzed the various programs state agencies created or augmented during the pandemic, and established ongoing collaboration as the crisis evolved.

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 formed as a result of a grant through the Federal SAMHSA and is an integral element of the updated State Plan to Support Families and Unaccompanied Youth Experiencing Homelessness, furthering the efforts of the Interagency Council by focusing on families and unaccompanied youth experiencing homelessness. Its key goals include increasing leadership, collaboration and civic engagement, increasing access to stable and affordable housing for the target populations, increasing economic security, and increasing health and stability

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) are required to 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 Homeless Management Information System (HMIS)

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

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Table 2 – Agencies, groups, organizations who participated

1	Agency/Group/Organization	Alliance to End Homelessness in Suburban Cook County
	Agency/Group/Organization Type	Housing Services - Housing Services-Victims of Domestic Violence Regional organization
	What section of the Plan was addressed by Consultation?	Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Helps refine the Illinois Continuum-wide request for information for the homeless needs assessment
2	Agency/Group/Organization	Corporation for Supportive Housing
	Agency/Group/Organization Type	Housing Services - Housing Services-Persons with Disabilities Services-homeless
	What section of the Plan was addressed by Consultation?	Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	A member of the 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

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3	Agency/Group/Organization	IFF (formerly Illinois Facilities Fund)
	Agency/Group/Organization Type	Housing Regional organization Private Sector Banking / Financing
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	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
4	Agency/Group/Organization	Illinois Manufactured Housing Association
	Agency/Group/Organization Type	Housing Business and Civic Leaders
	What section of the Plan was addressed by Consultation?	Housing Need Assessment
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Member of the Advisory Committee: IMHA serves as a trade organization for the manufactured housing industry, representing manufacturers, retailers, suppliers and rental community owners
5	Agency/Group/Organization	Illinois Mental Health Planning and Advisory Council
	Agency/Group/Organization Type	Services-Children Services-Elderly Persons Services-Persons with Disabilities
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	

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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 2020-2024 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; Illinois Emergency Management Agency; 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 eighteen Illinois Continuum of Care (COC) statewide. Illinois CoCs coordinate their work with the Emergency Solutions Grants Program administered by IDHS, employing several similar strategies for ending homelessness in each of their jurisdictions and include the following: conducting coordinated assessments, developing additional permanent supportive housing, improving outreach, increasing capacity and enhancing organization, conducting public awareness activities to foster support, and improving transportation services (especially in rural areas).

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Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Fair Housing	State and Local Governments	<p>January 5, 2018, HUD extended the deadline for submission of an AFH by local government program participants until the next Five-Year Plan due after October 31, 2020. However, on May 23, 2018, HUD issued three notices: The first notice withdrew HUD's January 5, 2018 notice; The second notice withdrew HUD's Assessment Tool for Local Governments; and the third notice advised that Consolidated Plan participants must legally fulfil their obligation to affirmatively further fair housing by way of the Analysis of Fair Housing impediments (AFHI). The Preserving Community and Neighborhood Choice Final Rule was published on July 23, 2020. This final rule repeals the HUD 2015 Affirmatively Furthering Fair Housing regulations, and the 1994 Analysis of Impediments requirements where they appear in regulations and instead returns policy to HUDs pre-1994 understanding of the 1968 Fair Housing Act's obligation to affirmatively further fair housing. As such, States must continue to comply with existing obligations to affirmatively further fair housing. Pending additional HUD guidance, the State will continue to provide its AFFH Consolidated Plan Certification, and report on the State's actions to address fair housing impediments in the State's Consolidated Plan Annual Performance reports. Below is the State's summary of its planned actions to address Fair Housing Impediments. Besides processing fair housing complaints as a HUD-designated substantially equivalent agency, The Illinois Department of Human Rights 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. 2. 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 & Property Managers", LGBTQ-Equal Access Requirements, and Reasonable 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</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?
Fair Housing 1	State Government	<p>At this time, States and local governments, 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 in accordance with the requirements that existed prior to August 17, 2015. As such, IHDA will continue to report on the State's actions to address its previously identified fair housing impediments in the State Consolidated Plan Annual Action Plans and Annual Performance Reports. IHDA has also been taking on related actions beyond the AFH. IHDA views these measures as representative of sound policy and plans to continue these activities into the future: Opportunity Areas IHDA has determined Opportunity Areas based on poverty level and other indicators measuring access to jobs. Opportunity Areas are updated annually upon availability of census data and IHDA has maintained an open-door policy on incorporation of data sets that best represent the State of Illinois. Opportunity Areas and Proximate Opportunity Areas in close proximity with demonstrable connection are currently incentivized in the Qualified Allocation Plan with up to 10 points. IHDA continues to research the possibility of changing to an Opportunity Index that would incorporate additional factors into the Opportunity measurement (i.e. education, environmental health, etc.). This index would be circulated for public comment and discussion before adoption by IHDA. All Opportunity Area related research and materials are published on the IHDA webpageCommunity Revitalization Planning -IHDA will continue including scoring criteria in the QAP (up to 10 points) for community revitalization planning efforts in qualifying areas that demonstrate affordable housing development as part of a concerted effort to increase opportunity. This effort expands the standard requirements for the content of community revitalization plans, including those involving a project proposed in a Qualified Census Tract, to include economic revitalization efforts and other localized efforts. Projects located in Racially or Ethnically Concentrated Areas of Poverty (RCAPS/ECAPs) also are required to develop and submit a community revitalization strategy. And finally, to improve targeting of assistance to the most distressed areas, IHDA has developed Revitalization Impact Areas as part of the above scoring, which now also incentivize projects that are proposed in a State-designated Opportunity Zone. Additionally, IHDA now has a Community Revitalization team which provides and coordinates technical assistance throughout the state and oversees the community revitalization scoring efforts.</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?
Fair Housing 2	State Government	<p>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; and first mortgage financing programs-IHDA administers combined funding for its Permanent Supportive Housing Development Program, to better target special needs populations that also need services. This includes the national Housing Trust Fund-IHDA continues to develop and improve its Low Income Housing Tax Credit (LIHTC) Program to better serve lower-income households. Features include: enhanced accessibility (requiring twice the number of federally-required accessible housing units); Universal Design; Opportunity Areas; Community Revitalization efforts; scoring for income targeting, rental assistance, and energy conservation/green building; providing preference points to projects proposed in AHPAA communities (a State law identifying localities with less than 10% affordable housing stock); prioritizing projects that serve supportive housing populations via participation in the inter-agency Statewide Referral Network (SRN); and other areas-IHDA continues to assist Supportive Living Facilities, the state's assisted living program for elderly and persons with disabilities (via a Medicaid-approved waiver)-IHDA continues coordination with IDHS and IDoA in coordinating assistance with its Bridge Rental Subsidy Program, designed to assist class members of ADA-related court consent decrees-IHDA continues to coordinate with IDHS and local participating housing authorities which provided matching public housing and HCV units to persons with disabilities (as part of its Section 811 program)-Continues to address lead-based paint and water issues with IDPH, IEPA, IHDA, and DCEO-Continues to operate the Illinois housing search website through a third party vendor, providing real-time information on available statewide affordable housing units, monitoring for fair housing violations, and enhanced matching capability for State Referral Network (SRN) and 811 units, including those with accessible features</p>

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Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Fair Housing 3	State Government	<p>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 -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-IHDA continues to provide credit and foreclosure prevention counseling through local agencies. 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 Plan. 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 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>
Fair Housing 4	State Government	<p>Lack of funding to address needs-This issue was discussed above regarding the State's efforts to develop new program resources and pursue available funding opportunities-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>

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Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Fair Housing 5	Illinois Department of Human Rights (IDHR)	<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 relating to fair housing, and to the International Association for Official Human Rights Agencies</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?
Fair Housing 6	IHDA (with IDHR)	<p>IHDA promotes fair housing in the marketing of all its financed units under the Illinois Affordable Housing Trust Fund, the LIHTC, and HOME Programs, which require affirmative marketing plans as part of their application processes. IHDA recognizes the importance of non-discriminatory practices with regard to residential property and related facilities. IHDA's goal is to promote a condition in which all individuals in the same housing market area have available a like range of housing choices. Thus, IHDA requires all multifamily projects with 5 or more HOME for Trust Fund assisted units comply with IHDA's affirmative fair housing policies and procedures. IHDA also evaluates proposals involving single-family projects with five or more HOME assisted units to determine the appropriateness of affirmative marketing efforts. The Affordable Housing Trust Fund Program requires that projects with 5 or more units financed in whole or in part for family housing must have at least 20% of the units to be at least adaptable for future accessibility improvements. Projects involving HOME or the Risk Sharing Program funding must at minimum comply with the 5% minimum accessibility requirements of Section 504 of the Rehabilitation Act of 1973. Per the Qualified Allocation Plan for LIHTCs, projects must comply with all applicable federal and State accessibility laws to receive credits. Additional project scoring points are provided for developments that provide enhanced accessibility standards. For single-family programs, fair housing provisions are discussed at IHDA-hosted local training sessions and included in each lender's procedures manual, which is signed off by each participating lender's chief executive. Lenders located in urban areas of the State also must comply with the provisions of the Home Mortgage Disclosure Act and the Community Reinvestment Act, which includes monitoring by federal bank examiners for their particular category of lending institution (Office of Thrift Supervision, Federal Reserve Bank, or Office of the Comptroller of the Currency). Under Illinois' Rental Housing Support Program, all Local Administrative Agencies and participating landlords must follow all rules governing Fair Housing and all other applicable state and federal laws, and make efforts to publicize units under the RHSP, contacting non-profit corporations in the areas a LAA covers. IHDA provides a preference to LAA applicants which target up to 30% of their requested assistance to "Special Needs Tenant"</p>

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Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Fair Housing 7	DCEO (with IDHR)	DCEO administers one of the five State formula grants included in the State Consolidated Plan. DCEO requires fair housing activities (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
Fair Housing 8	Dept of Financial and Professional Regulations (with IDHR)	The Illinois Department of Financial and Professional Regulations (IDFPR) has two divisions that are involved in fair housing activities: Division of Banking and the Division of Professional Regulations. 1. The Division of Banking is responsible for regulating commercial banks and residential mortgage bankers, brokers and loan originators. Regarding fair lending, most attention has focused on federal regulatory actions to better insure non-discrimination and community reinvestment. 2. The Division of Professional Regulation licenses Real Estate Professionals, including real estate brokers, salespersons, and appraisers. The Division works with the other divisions to investigate claims of discriminatory real estate practices. The Division computer system also audits every real estate licensee's continuing education course work to ensure compliance with the continuing education requirements

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Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Fair Housing 9	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>
Fair Housing 10	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>

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Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Fair Housing 11	Office of the Attorney General (with IDHR)	Under the Illinois Human Rights Act (HRA) the Illinois Attorney General investigates possible fair housing violations when those violations demonstrate a pattern and practice of discrimination prohibited by the HRA. When the Attorney General has reasonable cause to believe that a person is engaged in a pattern and practice of illegal discrimination, the Attorney General may file a civil action to enforce the provisions of the HRA. Further, the Illinois Attorney General is responsible for enforcing the Environmental Barriers Act (EBA). This duty involves investigating alleged violations of the EBA and the Illinois Accessibility Code ("Code") and may include the filing of a lawsuit where necessary to ensure compliance with the EBA. The EBA and Code apply to the construction and alteration of public facilities and qualifying multi-story housing units. for purposed of housing discrimination, the Attorney General has jurisdiction over multi-story housing which is defined as "any building of 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 utilizes 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
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 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

Table 3 - Other local / regional / federal planning efforts

Narrative

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IHDA's Strategic Planning and Reporting 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 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

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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

As explained in the Executive Summary, the State also held additional public comments periods for the Housing Trust Fund and the Community Block Grant Program. The comments period for the HTF program ran from May 3, 2021 to June 1, 2021. As explained elsewhere in this Executive Summary, the thirty-day public comment period for CDBG was waived by HUD, in lieu of a three day public comments period. The CDBG public comments period ran from May 25, 2021 until May 27, 2021. Information to this was posted on both the DCEO and IHDA websites, and distributed via email by both DCEO and IHDA. The public hearing for the CDBG changes was combined into the public hearing for the HTF amendment. No public comments were received.

The Public Comment period began Friday, March 19, 2021 and ended Monday, April 19, 2021. The State held one statewide public hearing, via web-ex conference on Wednesday, April 14, 2021 at 10:30 A.M..

- A 2021 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-2021 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. Additional electronic and hard copies of the draft Consolidated Plan-2021 Action Plan were sent to interested parties as requested
- Notification of the date and time of the public hearing was included as part of the discussion at the Advisory Committee meeting, held the day before the public hearing.
- The public hearing was held Wednesday April 14, during the 30-day public comments period. The April 14 date for the hearing was also posted on IHDA's web-site
- IHDA made reasonable efforts to accommodate persons with sight-and hearing-impaired disabilities, as well as for significant groups of Non-English speaking residents.
- No public comment letters were received during the public comments period.
- The development of both the Citizen Participation Plan and Consolidated Plan provided more than ample opportunity for the public to provide comments.

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

Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
1	Public Hearing	Non-targeted/broad community	The public hearing was a conference call held Wednesday, April 14, 2021. Staff from all four administering agencies were in attendance. No members of the public joined the meeting. The meeting was adjourned after fifteen minutes with no additional call-ins	None	Not applicable	

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2	Public Meeting	Non-targeted/broad community	Meetings of the SPAR- Compliance and Reporting (SPAR-CR) Advisory Committee, providing a status update on Consolidated Plan activities under the five HUD formula grant programs are generally held quarterly. The Spring AC Meeting occurred via statewide web-ex conference on April 13, 2021, the day before the Public Hearing for the draft 2021 Action Plan. Notification of the date, time, and web/link for the public hearing was part of the Advisory Committee meeting discussion	Though members is the public did attend, no participants offered comments on the program updates and information shared at the meeting	Not Applicable	
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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)
3	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		Not applicable	
4	Internet Outreach	Non-targeted/broad community	No public comments were received	Generally, response to newspaper ads will result in attendance at the public hearing, or written letter response or email	Not applicable	

Table 4 – Citizen Participation Outreach

Expected Resources

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

Introduction

Expected Formula Grant resources available under the Consolidated Plan for the Community Block Grant Development (CDGB), HOME, Emergency Solutions Grants, Housing Opportunities for Persons with HIV/AIDS, and federal Housing Trust Fund (HTF) Programs

The State notes, that at the time of the publication of the draft 2021 Action Plan, actual funding amounts for the federal Housing Trust Fund had not yet been published. HUD addressed this issue in HUD CPD Notice 21-02. As discussed in the Executive Summary, the State developed an amendment to the drafted 2021 Consolidated Plan for the national Housing Trust Fund once the actual allocation amount was available.

In response to the following Presidentially declared disasters-- Midwest Floods of 2008, Hurricane Ike 2008 and Hurricane Sandy 2013-- Congress made additional funding available to IL DCEO for the CDBG program as Disaster Recovery grants to rebuild the affected areas in Illinois and provide crucial seed money to start the recovery process. Illinois DCEO is in the closeout phase of administering these three CDBG-DR grants and no further grants will be issued. The Action Plans for Midwest Floods of 2008, Hurricane Ike 2008 and Hurricane Sandy 2013 can be found at the following link, where the impact and needs assessment sections contain more detail:

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<https://www2.illinois.gov/dceo/CommunityServices/DisasterRecovery/Pages/default.aspx>

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	31,038,073	0	0	31,038,073	91,762,329	The 2021 allocation for Illinois' CDBG program is just over \$31 million, up about \$650,000 over last year.

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HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA							IHDA operates 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 2020 Program Income which has the same deadline as 2021 Grant Funds
			16,742,680	13,360,765	0	30,103,445	50,228,040		
HOPW A	public - federal	Permanent housing in facilities Permanent	2,156,86 0	0	0	2,156,86 0	6,470,580		HOPWA funds provide short term

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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: \$		
		housing placement Short term or transitional housing facilities STRMU Supportive services TBRA						mortgage, utility tenant-based assistance, facility based rental assistance and permanent housing placements.
ESG	public - federal	Conversion and rehab for transitional housing Financial Assistance Overnight shelter Rapid re-housing (rental assistance) Rental Assistance Services Transitional housing	5,282,194	0	0	5,282,194	21,128,776	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	30,702,615	0	0	30,702,615	37,272,024	Provides affordable rental housing for households at 30% AMI or below

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

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- 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. Economic Development grants must be matched (at a minimum) dollar for dollar. Housing Rehabilitation, Public Infrastructure, and Disaster Response 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. The State requires that at least 10% of total HTF project cost be leveraged with non-IHDA funding. IHDA anticipates most national HTF-funded projects will be highly leveraged.

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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 2020 Program Income and the FY 2021 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 \$13,360,765.81 in program income for PY 2021 as of December 31, 2020. Ten percent of program income minus recapture will be made available for administrative. Ten percent of the 2021 HOME allocation will be made available for administrative costs, which is \$1,674,268 for PY 2021.

National Housing Trust Fund State of Illinois Allocation for 2021 is \$30,702,615. Ten percent, or \$3,070,261 will be used for program administration. At the time of the publication of the draft 2021 Action Plan, the actual federal Housing Trust Fund allocation for the State of Illinois had not been released. HUD addressed this issue in HUD CPD Notice 21-02. Per this notice, the State ran an amendment to the draft 2021 Action Plan for purposes of the national Housing Trust Fund.

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.

HOPWA Housing Facilities Rehabilitation and Repair project started in 2018 and received grant extensions while environmental review was being finalized and getting approval from HUD to move forward. The rehabilitation and repair funds that were set down in 2018 spent in grant year 2020.

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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	2020	2024	Affordable Housing	Statewide Distribution	Affordable Housing	HOME: \$16,742,680	Rental units constructed: 48 Household Housing Unit Rental units rehabilitated: 33 Household Housing Unit
2	Singlefamily Owner Occupied Housing Rehabilitation	2020	2024	Affordable Housing	Statewide Distribution	Affordable Housing	CDBG: \$7,000,000	Homeowner Housing Rehabilitated: 127 Household Housing Unit
3	Housing Trust Fund Goals	2020	2024	Affordable Housing	Statewide Distribution	Affordable Housing	HTF: \$30,702,615	Rental units constructed: 46 Household Housing Unit Rental units rehabilitated: 32 Household Housing Unit
4	Prevent Homelessness	2020	2024	Homeless	Statewide Distribution	Homeless	ESG: \$0	Homelessness Prevention: 0 Persons Assisted
5	Provide Emergency Shelter to Homeless	2020	2024	Homeless	Statewide Distribution	Homeless	ESG: \$2,060,056	Homeless Person Overnight Shelter: 17500 Persons Assisted
6	Rapid Re-Housing of Homeless	2020	2024	Homeless	Statewide Distribution	Homeless	ESG: \$2,376,987	Tenant-based rental assistance / Rapid Rehousing: 2000 Households Assisted
7	Street Outreach to Homeless	2020	2024	Homeless	Statewide Distribution	Homeless	ESG: \$264,110	Other: 1500 Other

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Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
8	Housing For Persons with HIV/AIDS	2020	2024	Non-Homeless Special Needs	Statewide Distribution	Special Needs	HOPWA: \$2,156,860	Tenant-based rental assistance / Rapid Rehousing: 230 Households Assisted HIV/AIDS Housing Operations: 262 Household Housing Unit
9	Public Infrastructure Activities	2020	2024	Non-Housing Community Development	Statewide Distribution	Community and Economic Development	CDBG: \$18,000,000	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 16363 Persons Assisted
10	Economic Development	2020	2024	Non-Housing Community Development	Statewide Distribution	Community and Economic Development	CDBG: \$3,000,000	Jobs created/retained: 120 Jobs Businesses assisted: 3 Businesses Assisted
11	Disaster Response Program	2020	2024	Non-Housing Community Development	Statewide Distribution	Community and Economic Development	CDBG: \$2,120,450	

Table 6 – Goals Summary

Goal Descriptions

1	Goal Name	Multifamily Affordable Housing
	Goal Description	Multifamily Affordable Housing

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2	Goal Name	Singlefamily Owner Occupied Housing Rehabilitation
	Goal Description	The program targets housing projects which preserve single-family, owner-occupied housing and encourages neighborhood revitalization. The goal is calculated by dividing the funds allocated by the maximum amount of grant award (currently \$550,000), rounding up to the nearest whole number, and then multiplying the result by 10 (the minimum number of homes that must be completed per award).
3	Goal Name	Housing Trust Fund Goals
	Goal Description	New Construction and Rehabilitation and extremely-low income households
4	Goal Name	Prevent Homelessness
	Goal Description	ESG will not be funding this program for Fiscal Year 2021. The State of Illinois Homeless Prevention funds will supplement funding in the category. The State will fund short-term rental assistance, housing relocation and stabilization services in order to prevent persons from becoming homeless.
5	Goal Name	Provide Emergency Shelter to Homeless
	Goal Description	The State will provide funding for renovation, operation, and essential services for emergency shelters.
6	Goal Name	Rapid Re-Housing of Homeless
	Goal Description	The State will fund rapid rehousing assistance to reduce the amount of time persons are homeless
7	Goal Name	Street Outreach to Homeless
	Goal Description	The State will provide funding for street outreach activities and services to reduce the number of unsheltered homeless persons. Street Outreach to Homeless estimated to be 1,500.

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8	Goal Name	Housing For Persons with HIV/AIDS
	Goal Description	The Illinois Department of Public Health (IDPH) has expanded its Tenant Based Rental Assistance (TBRA) and HOPWA Permanent Housing Placement Services (PHP) statewide throughout the Ryan White Part B (RWPB) Lead Agent grant agreement. In addition, the IDPH continues to utilize a portion of its HOPWA funds to support Mortgage Assistance statewide as means to prevent loss of stable housing for HIV individuals. It should be noted that Short Term Rent Mortgage and Utility Assistance (STRMU) is primarily covered through other Department dollars that are rewarded through the Ryan White Part B Lead Agent grant agreements, and HOPWA STRMU assistance serves as a secondary or emergency support for the Regions per prior approval by IDPH Program Staff. Stable housing provides a foundation for individuals with chronic illness such as HIV/AIDS, to improve their health outcomes.
9	Goal Name	Public Infrastructure Activities
	Goal Description	Total requests for public infrastructure program funding have consistently outpaced the amount of available funding by as much as 3 to 1. This trend will likely continue as communities struggle to find funding to deliver critical resources. Goal is estimated by taking the amount of annual funding divided by the grant ceiling (\$550,000) multiplied by the average number of persons assisted per grant (500). This goal includes funding for water, stormwater, and sewer activities. Goal outcomes are based on 51% LMI.

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10	Goal Name	Economic Development
	Goal Description	<p>Many industries wishing to develop or expand in rural Illinois confront two types of gaps in realizing their project. First, there is often a gap in physical infrastructure necessary to accommodate a new or expanding business. Second, businesses are often unable to access sufficient capital at an affordable cost to ensure the project's viability. The CDBG Economic Development program provides funding based on a jobs/\$ ratio for public infrastructure on behalf of a business, acquisition, construction, reconstruction, leasehold improvements, fixtures, equipment and working capital.</p> <p>With the onset of the COVID-19 pandemic, we believe the number of businesses planning to open or substantially expand is reduced; thus we have decreased the amount allocated for this activity by 25% over the 2020 Action Plan.</p> <p>Goals are calculated by dividing the amount of funding by the grant award ceiling to equate to number of businesses assisted goal; and the total amount of funding divided by the jobs/\$ amount of \$25,000 per job to equate to number of jobs created goal.</p>
11	Goal Name	Disaster Response Program
	Goal Description	<p>This program is designed for communities experiencing an imminent or urgent threat to health and safety as indicated by a disaster declaration by the Governor of the State of Illinois. Qualifying communities may be reimbursed up to \$250,000 for debris removal, clearance of streets and temporary or permanent repair that does not alter environmental conditions.</p> <p>As there is no way to know if a qualifying disaster will occur in any given year, and the communities affected, it is not possible to establish a goal for assistance. If no qualifying disasters occur and no applications are received, this funding will be reprogrammed for other eligible activities.</p>

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AP-25 Allocation Priorities – 91.320(d)

Introduction:

Housing-Related Allocation Priorities for the State of Illinois are outlined as follows.

Funding Allocation Priorities

	Multifamily Affordable Housing (%)	Singlefamily Owner Occupied Housing Rehabilitation (%)	Housing Trust Fund Goals (%)	Prevent Homelessness (%)	Provide Emergency Shelter to Homeless (%)	Rapid Re- Housing of Homeless (%)	Street Outreach to Homeless (%)	Housing For Persons with HIV/AIDS (%)	Public Infrastructure Activities (%)	Economic Development (%)	Disaster Response Program (%)	Total (%)
CDBG	0	24	0	0	0	0	0	0	61	10	5	100
HOME	100	0	0	0	0	0	0	0	0	0	0	100
HOPWA	0	0	0	0	0	0	0	100	0	0	0	100
ESG	0	0	0	0	39	45	5	0	0	0	0	89
HTF	0	0	100	0	0	0	0	0	0	0	0	100

Table 7 – Funding Allocation Priorities

Reason for Allocation Priorities

ESG Funding percentages for homeless priorities are determined in consultation with Illinois Continuum of Care organizations. Percentages doesn't include administration allocation of 7.5% and HMIS allocation of 3.5%.

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

Regarding federal HTF Funds: HTF funding provides rental assistance for families at 30% AMI or below. All federal HTF funding will result in increased affordable rental opportunities for households at/or below 305 AMI across the State.

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DCEO recognizes the need and impact of single-family owner-occupied housing rehabilitation and will continue to make funding available.

HOPWA funding can only serve those living with HIV/AIDS that are currently housed with household income at or below 80 percent the area median income. HOPWA and Ryan White Part B fund provides a safety net for persons living with HIV/AIDS to move or maintain long-term, stable living situations. Illinois communities are facing the same problems as in other areas of the country: housing closures, understaffed facilities, increase in housing clientele and reduction in funds for housing assistance. HOPWA and Ryan White funds provide a resource that is critical to people living with HIV/AIDS in Illinois. The use of CARE Act Funds has enabled housing opportunities for persons living with HIV/AIDS in 2020, which will not be available for calendar year 2021 as this funding has been expended.

Note that not all priorities under each program 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 Continuum 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 Continuum, as well as study their data and their determinations of the 'right mix' of funding allocation for the priority needs.

The prevention of homelessness is the most important element of administering the HOPWA program. Persons living with HIV/AIDS require decent affordable stable housing in order to receive healthcare.

The continuum of care that is provided through local HIV care Connect Region includes the following services: case management, primary medical care, lab services, treatment adherence services, dental care, rent assistance, emergency housing assistance, utility assistance, legal services, nutritional services, optical services, mental health counseling, substance abuse counseling, transportation, and alternative therapies. 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

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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.

Besides the carve-out for Housing Rehabilitation, DCEO is distributing funding based on the needs identified in the Consolidated Plan, with the majority of available funds going to assist communities with safe and healthy drinking water and sanitary sewer systems. With the impact of COVID-19, the need for Economic Development assistance is anticipated to grow. We must always be prepared to assist in case of a disaster, thus the set-aside for Disaster Response.

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

Introduction:

The following Methods of Distribution are provided for the five federal formula grant programs administered by the State of Illinois:

Community Development Block Grant Program (CDBG):

HOME:

Emergency Solutions Grants Program (ESG):

Housing Opportunities for Persons With AIDS (HOPWA): and the federal

Housing Trust Fund (HTF)

Distribution Methods

Table 8 - Distribution Methods by State Program

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

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<p>Describe all of the criteria that will be used to select applications and the relative importance of these criteria.</p>	<p><u>ELIGIBILITY THRESHOLDS</u></p> <p>Projects must meet the following minimum thresholds:</p> <ol style="list-style-type: none"> 1. Application must be for an area included in a Disaster Declaration by the Governor of the State of Illinois. 2. The community must be unable to finance the activity on its own; and 3. The community has exhausted all other options/sources for funding the activity. <p><u>DOCUMENTATION REQUIREMENTS</u></p> <p>Each application <u>must</u> include the UGLG's most recent audit. If unavailable, please contact the Department to determine potential alternative documentation.</p> <ol style="list-style-type: none"> 1. All required application forms must be completed with appropriate backup documentation. 2. 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. <p>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</p>
<p>If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)</p>	<p>Application Guidelines and forms can be found at: http://www.illinois.gov/dceo</p>

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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)	N/A			
Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)	N/A			
Describe how resources will be allocated among funding categories.	Program Category	Budget	Ceiling	Deadline
	<i>Ongoing (non-competitive Programs)</i>			
	Economic Development (ED)	\$ 3,000,000	\$1,000,000	NA
	Disaster Response (DR)	\$ 2,120,450	\$ 250,000	NA
	<i>Competitive Programs</i>			
	Public Infrastructure (PI)	\$18,000,000	\$ 550,000	8/3/2021
Housing Rehabilitation (HR)	\$ 7,000,000	\$ 550,000	8/3/2021	

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	Describe threshold factors and grant size limits.	Applications must come after a State Disaster Declaration by the Governor for the area. Grant limit is \$250,000 unless the limit is waived by DCEO's Director
	What are the outcome measures expected as a result of the method of distribution?	Unknown at this time
2	State Program Name:	CDBG Economic Development Program
	Funding Sources:	CDBG
	Describe the state program addressed by the Method of Distribution.	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.
	Describe all of the criteria that will be used to select applications and the relative importance of these criteria.	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: <ol style="list-style-type: none"> 1. Project Benefit 2. CDBG National Objectives 3. CDBG Dollars 4. Resource Funding
	If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)	Application Guidelines and forms can be found at: http://www.illinois.gov/dceo

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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)	N/A			
Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)	N/A			
Describe how resources will be allocated among funding categories.	Program Category	Budget	Ceiling	Deadline
	<i>Ongoing (non-competitive Programs)</i>			
	Economic Development (ED)	\$ 3,000,000	\$1,000,000	NA
	Disaster Response (DR)	\$ 2,120,450	\$ 250,000	NA
	<i>Competitive Programs</i>			
	Public Infrastructure (PI)	\$18,000,000	\$ 550,000	8/3/2021
Housing Rehabilitation (HR)	\$ 7,000,000	\$ 550,000	8/3/2021	

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3	Describe threshold factors and grant size limits.	<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"> • Acquisition of land or building; • Purchase or installation of fixtures; • Construction, reconstruction, installation or rehabilitation of commercial or industrial buildings, structures and other real property); • Leasehold improvements; and • Working capital expenses (inventory, employee salaries, general operating expenses and advertising/marketing expenses. <p>2. Units of local government may use CDBG funds for public infrastructure improvements in support of economic development</p>
	What are the outcome measures expected as a result of the method of distribution?	<p>The number of persons and businesses served for the Economic Development program is calculated by dividing the program budget of \$3,000,000 by the grant ceiling of \$1,000,000; equating to 3 businesses; and then multiplying by the jobs to dollars ratio of \$1 to \$25,000; equaling 120.</p>
	State Program Name:	CDBG Housing Rehabilitation Program
	Funding Sources:	CDBG
	Describe the state program addressed by the Method of Distribution.	<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>

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<p>Describe all of the criteria that will be used to select applications and the relative importance of these criteria.</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"> 1. <u>Project Need – Maximum Score 20 Points</u> 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. 2. <u>Project Impact – Maximum Score 20 Points</u> 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. 3. <u>Coordination of Resources – Maximum Score 30 Points</u> 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. 4. <u>Project Readiness – Maximum Score 30 Points</u> 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
<p>If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)</p>	<p>Application Guidelines and forms can be found at: http://www.illinois.gov/dceo</p>

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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)	N/A			
Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)	N/A			
Describe how resources will be allocated among funding categories.	Program Category	Budget	Ceiling	Deadline
	<i>Ongoing (non-competitive Programs)</i>			
	Economic Development (ED)	\$ 3,000,000	\$1,000,000	NA
	Disaster Response (DR)	\$ 2,120,450	\$ 250,000	NA
	<i>Competitive Programs</i>			
	Public Infrastructure (PI)	\$18,000,000	\$ 550,000	8/3/2021
	Housing Rehabilitation (HR)	\$ 7,000,000	\$ 550,000	8/3/2021

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	Describe threshold factors and grant size limits.	Benefit to Low-and-Moderate Income Persons: Each application must include documentation that the proposed project will benefit 100% low-to-moderate income persons. Those projects benefiting less than 100% low-to-moderate income persons will not be considered further. Minimum grant award is \$250,000; grant ceiling is \$550,000
	What are the outcome measures expected as a result of the method of distribution?	CDBG Housing Rehabilitation Program goals are determined by dividing the program budget of \$7,000,000 by the grant ceiling of \$550,000 to equal 12.7 grants, required by the required number of homes (10) per grant to equate to 127.
4	State Program Name:	CDBG Public Infrastructure Program
	Funding Sources:	CDBG
	Describe the state program addressed by the Method of Distribution.	The objective of this competitive program component is to fund public infrastructure projects, with priority given to projects involving water and sanitary systems, or storm sewer upgrades

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<p>Describe all of the criteria that will be used to select applications and the relative importance of these criteria.</p>	<p>Projects will be evaluated according to the criteria noted below.</p> <ol style="list-style-type: none"> 1. Inclusion in an Opportunity Zone (5 percent of overall score) 2. Inclusion in a DCEO Underserved Area (5 percent of overall score) 3. Project Impact/Per Capita Cost: In order to maximize the number of beneficiaries, points will be assigned according to the grant funds requested per person served. A maximum of ten points will be assigned to projects requesting \$1,000 or less per person served. No points will be assigned to projects requesting \$5,000 or more per person. 4. Additional Funding: Additional points will be assessed for communities contributing other funding toward the completion of the proposed project. A maximum of 5 points will be assigned to projects contributing 75% or more of the total project costs. No points will be assigned to projects contributing less than .9% of the total project costs (minimum \$10,000) or under \$10,000. 5. Threat to Health & 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 <p>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</p>
<p>If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)</p>	<p>Application Guidelines and forms can be found at: http://www.illinois.gov/dceo</p>

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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)	N/A			
Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)	N/A			
Describe how resources will be allocated among funding categories.	Program Category	Budget	Ceiling	Deadline
	<i>Ongoing (non-competitive Programs)</i>			
	Economic Development (ED)	\$ 3,000,000	\$1,000,000	NA
	Disaster Response (DR)	\$ 2,120,450	\$ 250,000	NA
	<i>Competitive Programs</i>			
	Public Infrastructure (PI)	\$18,000,000	\$ 550,000	8/3/2021
Housing Rehabilitation (HR)	\$ 7,000,000	\$ 550,000	8/3/2021	

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	Describe threshold factors and grant size limits.	<p>1.Low to Moderate Income Benefit Requirement: Each application must include documentation that the proposed project will benefit at least 51.0 percent LMI persons.</p> <p>2.Documentation of Threat to Health and Safety: Each application should detail the public infrastructure needs to be addressed by the proposed project.</p> <p>3.Water and Sewer Rates: A fundamental principle of utility fund financing is that user rates should be sufficient to fund the entire cost of utility system operations.</p> <p>Minimum grant award is \$250,000; grant ceiling is \$550,000</p>
	What are the outcome measures expected as a result of the method of distribution?	The number of persons served for the Public Infrastructure program is calculated by dividing the program budget of \$18,000,000 by the grant ceiling of \$550,000; equating to 32.7; and then multiplying by the average number of persons served by each Public Infrastructure grant (500); equaling 16,363.
5	State Program Name:	Emergency Solutions Grants Program
	Funding Sources:	ESG
	Describe the state program addressed by the Method of Distribution.	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
	Describe all of the criteria that will be used to select applications and the relative importance of these criteria.	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).

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<p>If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)</p>	<p>N/A</p>
<p>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)</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>Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)</p>	<p>N/A</p>

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	Describe how resources will be allocated among funding categories.	Resources are allocated to eligible ESG activities based on Continuum of Care recommendations as needs vary across the communities
	Describe threshold factors and grant size limits.	ESG minimum grant award is \$25,000. Recipients must be a participating member of a Homeless Continuum of Care
	What are the outcome measures expected as a result of the method of distribution?	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 individual and families who need emergency shelter
6	State Program Name:	HOME Multifamily (including CHDO)
	Funding Sources:	HOME
	Describe the state program addressed by the Method of Distribution.	Multifamily new construction and rehabilitation (including Community Housing Development Organizations - CHDOs).
	Describe all of the criteria that will be used to select applications and the relative importance of these criteria.	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 factors increase if the Low Income Housing Tax Credit is involved, as the program has its own separate application scoring system.
	If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)	IHDA's Multifamily common application system, forms, and instruction are posted on IHDA's website at www.ihda.org/developer/forms.htm#referenceDocuments

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<p>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)</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>Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)</p>	<p>N/A</p>
<p>Describe how resources will be allocated among funding categories.</p>	<p>Under the 2020-2024 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>

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	Describe threshold factors and grant size limits.	Threshold factors are described in detail in the Multifamily common application referenced above. Grant (loan) size limits have been imposed 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 it is set at 10% of total development costs. For Chicago-metro, and other metro areas, it is set at 15% of total development costs, capped at a maximum request of \$1 million
	What are the outcome measures expected as a result of the method of distribution?	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: <ul style="list-style-type: none"> • 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
7	State Program Name:	HOPWA Facility Based Rental Assistance
	Funding Sources:	HOPWA
	Describe the state program addressed by the Method of Distribution.	The HOPWA facility-based program will provide rent and supportive services to persons living with HIV/AIDS. The Illinois HOPWA program eligibility is based on the 80% area median income. The individual requesting housing assistance must demonstrate a need for housing assistance. Funding will expand to outside the Illinois HOPWA jurisdictional area.

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

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<p>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)</p>	<p>N/A</p>
<p>Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)</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 unstable housing and/or homelessness. Stable housing provides a foundation for individuals with chronic illness such as HIV/AIDS, to improve their health outcomes.</p>
<p>Describe how resources will be allocated among funding categories.</p>	<p>Resources are allocated through the State of Illinois HIV Care Region and will be based on the guidelines established for the facility based rental assistance and funding availability. It is always critical to be mindful that to the best of the IDPH's ability we work to integrate HOPWA and Ryan White funds to ensure maximization of resources to have an enhanced impact on housing stability of the population served.</p>

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Describe threshold factors and grant size limits.	<p>The HIV Care Connect Region funding formula is based on an annual award amount that is based on parity based/with utilization figures from the prior year, which is data driven. 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 IDPH 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, IDPH 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 through the IDPH grant making process.</p>
What are the outcome measures expected as a result of the method of distribution?	<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. The IDPH staff will monitor quality improvement and positive performance outcomes based on viral suppression of clients receiving HOPWA funded support. The IDPH Program as set an 85% or greater viral suppression goal as set by the United States National HIV strategy and the Ryan White Part B's integrated plan and "Getting to Zero" alignment for HIV in the State of Illinois.</p>

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8	State Program Name:	HOPWA Facility-Based Housing Operations Assistance Program
	Funding Sources:	HOPWA
	Describe the state program addressed by the Method of Distribution.	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 IDPH 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.
	Describe all of the criteria that will be used to select applications and the relative importance of these criteria.	The IDPH'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.
	If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)	N/A

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<p>Describe the process for awarding funds to state recipients and how the state will make its allocation available</p> <p>to units of general local government, and non-profit organizations, including community and faith-based organizations. (ESG only)</p>	<p>N/A</p>
<p>Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)</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 IDPH Program hosts 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 ensure that the most in need will receive housing assistance. The application required all HIV Care Connect Regions to describe the intended regional area to be served, the population of persons with HIV/AIDS, and the housing service needs not currently being addressed by public and private resources within the service area.</p>

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Describe how resources will be allocated among funding categories.	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 IDPH 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. In addition, resources are allocated through the State of Illinois HIV Care Region and will be based on the guidelines established for the facility based rental assistance and funding availability. It is always critical to be mindful that to the best of the IDPH's ability we work to integrate HOPWA and Ryan White funds to ensure maximization of resources to have an enhanced impact on housing stability of the population served.
Describe threshold factors and grant size limits.	AIDS designated housing facilities which are located in the HIV Care Connect Region received funding to service persons living HIV/AIDS who need housing and supportive services. Maximum grant amounts are dependent on funding availability and are delineated by IDPH during the grant application process and all guidance that are outlined in Program's standard operating procedures and policy manuals.
What are the outcome measures expected as a result of the method of distribution?	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. The IDPH staff will monitor quality improvement and positive performance outcomes based on viral suppression of clients receiving HOPWA funded support. The IDPH Program as set an 85% or greater viral suppression goal as set by the United States National HIV strategy and the Ryan White Part B's integrated plan and "Getting to Zero" alignment for HIV in the State of Illinois.

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9	State Program Name:	HOPWA Facility-Based Housing Rehabilitation and Repair
	Funding Sources:	HOPWA
	Describe the state program addressed by the Method of Distribution.	Not Provided in the 2021 federal grant area.
	Describe all of the criteria that will be used to select applications and the relative importance of these criteria.	Not Provided in the 2021 federal grant area.
	If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)	N/A
	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)	N/A

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	Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)	Not Provided in the 2021 federal grant area.
	Describe how resources will be allocated among funding categories.	Not Provided in the 2021 federal grant area.
	Describe threshold factors and grant size limits.	Not Provided in the 2021 federal grant area.
	What are the outcome measures expected as a result of the method of distribution?	Not Provided in the 2021 federal grant area.
10	State Program Name:	HOPWA Permanent Housing Placement Services
	Funding Sources:	HOPWA
	Describe the state program addressed by the Method of Distribution.	Funding will provide individuals with HIV/AIDS, first month rent and security deposits to establish permanent residential housing

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<p>Describe all of the criteria that will be used to select applications and the relative importance of these criteria.</p>	<p>IDPH'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. PHP 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. Permanent Housing will be used to provide first month's rent and security deposits to enable persons with HIV /AIDS to acquire housing.</p>
<p>If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)</p>	<p>N/A</p>

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<p>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)</p>	<p>N/AThe 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 ensure 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>Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)</p>	<p>The 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>Describe how resources will be allocated among funding categories.</p>	<p>Resources that are allocated through the State of Illinois HIV Care Region and will be based on the guidelines established for Permanent Housing Placement and funding availability through the grant making process first for estimates; and then as utilization is captured throughout the grant year with monthly monitoring. It is always critical to be mindful that to the best of the IDPH's ability we work to integrate HOPWA and Ryan White funds to ensure maximization of resources to have an enhanced impact on housing stability of the population served.</p>

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	Describe threshold factors and grant size limits.	Resources that are allocated through the State of Illinois HIV Care Region and will be based on the guidelines established for PHP and funding availability based on past year utilization figures.
	What are the outcome measures expected as a result of the method of distribution?	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. The IDPH staff will monitor quality improvement and positive performance outcomes based on viral suppression of clients receiving HOPWA funded support. The IDPH Program as set an 85% or greater viral suppression goal as set by the United States National HIV strategy and the Ryan White Part B's integrated plan and "Getting to Zero" alignment for HIV in the State of Illinois.
11	State Program Name:	HOPWA Short-term Rent, Utility, Mortgage Program
	Funding Sources:	HOPWA
	Describe the state program addressed by the Method of Distribution.	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 IDPH housing service caps are instituted under the HOPWA program to include uniformity and non-discrimination to households requesting rent, mortgage, or utility assistance. Caps are determined by fair market rents/rent reasonableness.

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

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<p>Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)</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 ensure 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>Describe how resources will be allocated among funding categories.</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. Agencies are 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. As stated previously, resources are allocated through the State of Illinois HIV Care Region and will be based on the guidelines established for the STRMU availability. It is always critical to be mindful that to the best of the IDPH's ability we work to integrate HOPWA and Ryan White funds to ensure maximization of resources to have an enhanced impact on housing stability of the population served. Finally, it is critical to state that IDPH uses other funding sources to support STRU and HOPWA is only used for emergency purposes which requires prior approval by the IDPH Program Management. Mortgage Assistance is the only part of STRMU that is solely supported through HOPWA funds.</p>

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<p>Describe threshold factors and grant size limits.</p>	<p>HIV Care Connect Region funding formula is based on an annual award amount that is based on prior utilization 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>What are the outcome measures expected as a result of the method of distribution?</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>

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12	State Program Name:	HOPWA Tenant Based Rental Assistance
	Funding Sources:	HOPWA
	Describe the state program addressed by the Method of Distribution.	In the grant application, developed by the IDPH's Ryan White Part B Program staff, the Regional Care Lead Agents were required to 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. 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.
	Describe all of the criteria that will be used to select applications and the relative importance of these criteria.	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.
	If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)	N/A

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<p>Describe the process for awarding funds to state recipients and how the state will make its allocation available</p> <p>to units of general local government, and non-profit organizations, including community and faith-based organizations. (ESG only)</p>	<p>M/A</p>
<p>Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)</p>	<p>The selection process will be opened to the entire State. The IDPH allows the HIV Care Connect Lead Agents to subcontract with local service providers for housing services. The IDPH will be holding meetings with lead agents, giving instruction on how to include faith-based organizations as entities eligible to apply for funding.</p>
<p>Describe how resources will be allocated among funding categories.</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 ensure that the most in need will receive housing assistance. The application required all HIV Care Connect Regions to describe the intended regional area to be served, the population of persons with HIV/AIDS, and the housing service needs not currently being addressed by public and private resources within the service area.</p>

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	Describe threshold factors and grant size limits.	Project Sponsors that are located in the State of Illinois can submit a request for providing Tenant Based Rental Assistance. Project Sponsors will receive funding to service persons living with HIV/AIDS who need housing and supportive services.
	What are the outcome measures expected as a result of the method of distribution?	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. The IDPH staff will monitor quality improvement and positive performance outcomes based on viral suppression of clients receiving HOPWA funded support. The IDPH Program as set an 85% or greater viral suppression goal as set by the United States National HIV strategy and the Ryan White Part B's integrated plan and "Getting to Zero" alignment for HIV in the State of Illinois.

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13	State Program Name:	National Housing Trust Fund
	Funding Sources:	HTF
	Describe the state program addressed by the Method of Distribution.	<p>The Illinois Housing Development Authority (IHDA) has been designated by the Governor as the administering State agency for the federal Housing Trust Fund (HTF). Authorizing statute and HUD's interim rule place specific parameters on the eligible uses of these funds. State federal HTF 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 2021 funding cycle.</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 federal 2021 HTF Allocation Plan.</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>Describe all of the criteria that will be used to select applications and the relative importance of these criteria.</p>	<p>IHDA will use its Multi-Family “Common Application” as the major application format for HTF 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 Applications (RFA) process will be used if needed to expedite obligation of program funds. Under the RFA, IHDA requires that at least 10% of the total project cost be leveraged with non-IHDA resources. IHDA will not allow refinancing of existing debt as an eligible activity in the 2021 Allocation Plan of HTF, 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 2020-2024 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 HTF, rather than establish geographic set asides under the HTF. 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 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-year affordability period. This will work well particularly for LIHTC projects (extended use</p>
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	<p>periods). Applicants are encouraged to establish longer affordability periods but must meet this minimum.</p> <p><u>Priority Housing Needs:</u> These are defined in the State's Comprehensive Planning Act, and include ELI households; low-income seniors; low-income persons with disabilities; homeless and at-risk homeless persons and families; low-income households residing in communities with ongoing community revitalization; preservation; live-near-work projects, and other homeless prevention for special needs individuals such as veterans' and people with criminal records.</p>
<p>If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)</p>	N/A
<p>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)</p>	N/A
<p>Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)</p>	N/A

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<p>Describe how resources will be allocated among funding categories.</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 2021 Illinois HTF allocation is \$30,702,614. There is also allowance to use up to 10% of all funds (\$3,070,261 in 2021) 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/HTF program funds but will strive to achieve maximum geographic diversity in its final funding decisions.</p>
<p>Describe threshold factors and grant size limits.</p>	<p>Maximum Per Unit Development Subsidy Costs-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 \$351,000 per unit</p> <p>Maximum HTF Grant Limit is \$8,500,000, not to exceed 90% of total projects cost.</p>
<p>What are the outcome measures expected as a result of the method of distribution?</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"> • 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.

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Discussion:

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AP-35 Projects – (Optional)

Introduction:

Projects added as project applications to the State are approved

#	Project Name
1	IHDA Admin FY21
3	NHTF IHDA Admin FY20
4	MHR-11780 Main Street Lofts

Table 9 – Project Information

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

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AP-38 Project Summary

Project Summary Information

1	Project Name	IHDA Admin FY21
	Target Area	
	Goals Supported	
	Needs Addressed	Affordable Housing
	Funding	HTF: \$1,242,400
	Description	
	Target Date	
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	
2	Project Name	NHTF IHDA Admin FY20
	Target Area	
	Goals Supported	
	Needs Addressed	Affordable Housing
	Funding	HTF: \$857,551
	Description	
	Target Date	
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	

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	Planned Activities	
3	Project Name	MHR-11780 Main Street Lofts
	Target Area	Statewide Distribution
	Goals Supported	Housing Trust Fund Goals
	Needs Addressed	Affordable Housing
	Funding	HTF: \$2,730,000
	Description	
	Target Date	
	Estimate the number and type of families that will benefit from the proposed activities	12 Extremely Low-Income Households
	Location Description	
	Planned Activities	

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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

N/A

Acceptance process of applications

N/A

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

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

No

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

N/A

AP-50 Geographic Distribution – 91.320(f)

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

The State has identified very and extremely low-income households as one of the priority populations under the Consolidated Plan. The State also places 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 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. 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 achieved 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).

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	

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 CDBG Housing Rehabilitation Program targets housing projects which preserve single-family, owner-occupied housing and encourages neighborhood revitalization. The goal is established by taking the amount of funding available, dividing it by the grant ceiling and multiplying the number by the required number of homes completed with a grant.

The Illinois Department of Public Health (IDPH) has expanded its Tenant Based Rental Assistance (TBRA) and HOPWA Permanent Housing Placement Services (PHP) statewide throughout the Ryan White Part B (RWPB) Lead Agent grant agreement. In addition, the IDPH continues to utilize a portion of its HOPWA funds to support Mortgage Assistance statewide as means to prevent loss of stable housing for HIV individuals.

One Year Goals for the Number of Households to be Supported	
Homeless	2,000
Non-Homeless	286
Special-Needs	262
Total	2,548

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

One Year Goals for the Number of Households Supported Through	
Rental Assistance	2,262
The Production of New Units	94
Rehab of Existing Units	192
Acquisition of Existing Units	0
Total	2,548

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

Discussion:

Production of 48 new units includes anticipated units through HOME Multifamily

Rehab of 33 existing units includes anticipated units through HOME Multifamily

Production of 46 new units includes anticipated units through National Housing Trust Fund

Rehab of 32 existing units includes anticipated units through National Housing Trust Fund

Rehab of existing units includes 127 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 goal of households assisted through short-term rent and mortgage assistance (STRMU), Tenant Based Rental Assistance (TBRA), and Permanent Housing Placement (PHP).

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

Introduction:

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.

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 sent an email inviting them to attend the public hearings on the 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 has kept the Illinois Association of Housing Authorities (IAHA) and the Illinois Chapter of the National Association of Housing and Redevelopment Officials (NAHRO) informed of these 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 SPAR/OHCS division as part of its 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

For troubled PHAs, 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 (CoC) 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 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

Every CoC has established a coordinated entry program.

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 2021 State ESG Allocation is \$5,282,194.

The IDoA'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

Addressing the emergency shelter and transitional housing needs of homeless persons

Housing relocation and stabilization services and short- and/or medium-term rental assistance is 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.

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 17,500 Homeless Persons through overnight shelters in 2021.

State efforts to maintain Permanent Supportive Housing (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 focus around emergency shelter and transitional or temporary housing; however, some are working to provide permanent supportive housing (PSH) for youth. Some CoCs focus on PSH for the chronic homeless and/or 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

IDoA's Colbert Consent Decree implementation plan helps 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 of IDHS 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.

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.

AP-70 HOPWA Goals – 91.320(k)(4)

One year goals for the number of households to be provided housing through the use of HOPWA for:	
Short-term rent, mortgage, and utility assistance to prevent homelessness of the individual or family	32
Tenant-based rental assistance	230
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	0
Total	262

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

Introduction:

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 13 HAINs in 2020. (2) The Illinois Housing Locator system, ILHousingSearch.org continues to operate, allowing landlords to list available rental properties to prospective renters. By December 31, 2020, 7,887 landlords had registered 139,365 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. 337 units were assisted in 2020

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. The Statewide Referral Network (SRN) lists over 2,000 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.

IHDA's Strategic Planning and Reporting (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 154 supportive living facilities sites (12,846 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. The General Assembly used this information to pass a statewide program in 2017.

The State's 2019 Fiscal Year budget includes an additional \$15,000,000 For the CLEAR-WIN program. The money is to be used for low-income families of children with elevated blood levels. The funds can be used for lead-remediation, including lead in the home's water system. Due to delays caused by COVID, funds are expected to be committed during the construction season of 2022.

Actions planned to reduce the number of poverty-level families

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

(1)The HHS-funded Community Services Block Grant (CSBG) Program is the major federal-funded anti-poverty program, using Community Action Agencies (CAAs) to coordinate these anti-poverty efforts at the local level. In coordination with other subject-specific programs, efforts are geared to enabling low-income persons to become more self-sufficient. It is administered by DCEO at the State level, which

funds the statewide network of CAAs and related organizations on an annual basis, contingent on federal funding. Uses of CSBG funds include the following: economic development; education; emergency assistance; health; housing; income management; linkages; nutrition; and self-sufficiency. IHDA funds a number of local CAAs for housing rehabilitation programs.

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

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

(4)DCEO administered the DOL-funded Workforce Investment and Opportunity Act funding, which provides federal funding to workforce development boards (WDBs) across the state for local employment and job training programs. The State coordinated its efforts in this area by establishing Illinois Employment & Training Centers, which include staffing from WDBs, IDES-unemployment assistance and employment data and projections, and IDHS, to provide a one-stop shop for human services. IHDA also provided this information for LIHTC applicants who were working in Community Revitalization Areas to encourage them to include an economic development/employment and training 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. 337 units were assisted in 2020.

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)

The following actions are expected over the next 5 years:

1. Regular meetings of the Illinois Housing Task Force, its Executive 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 Executive 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 various partners to co-sponsor conferences and trainings, as well as sharing information 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 Health Care Services 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. Ongoing administration of the Affordable Housing Planning and Appeals Act Program
2. Providing targeted training on Reasonable Accommodations policy and practice; and
3. Continue inclusion of the 30% preference for Special Needs Tenants under IHDA's Rental Housing Support Program; and
4. 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 2020-2024 Consolidated Plan, IHDA is only utilizing HOME funding for rental housing development/rehabilitation

CDBG: As there is no data field to answer the question below concerning Overall Benefit, DCEO is providing the information here. The three-year period of 2020-2022 will be utilized to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit low-to-moderate income persons

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
Total Program Income:	0

Other CDBG Requirements

1. The amount of urgent need activities	20
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.	80.00%

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

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as follows:

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

As applicable, the Authority may invest HOME funds as other forms of assistance that HUD determines to be consistent with the purposes of this part and specifically approved in writing

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

Under the 2020-2024 Consolidated Plans (and previously, the 2015-2019), IHDA is only utilizing HOME funding for rental housing development/rehabilitation

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 2020-2024 Consolidated Plan (and the previous 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 the 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 18 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.

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 Illinois 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 24 CFR 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 as 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 a mandatory concept meeting with the Authority, a Preliminary Project Application (as defined in the RFA) an initial completeness/eligibility scoring, review of mandatory requirements, underwriting, site and market review, peer review, internal Loan Committee and IHDA Board approval. Federal 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. Under the RFA, requests for funding may not exceed 90% of total project cost. Maximum allowable for 4+ bdrm size in City of Chicago and Chicago Metro Area is \$351,000 per unit. Under the RFA, the Maximum Grant Limit is \$8,500,000, not to exceed 90% of total project cost.

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, though also an eligible activity, 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 could 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 to the Affordable Housing Planning and Appeal Act to the prioritizing applications that are consistent with the 2020-2024 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 HTF, rather than establish geographic set asides under the HTF. In an effort to increase geographic diversity, IHDA will provide application workshops based upon approved PPAs, including "virtual" workshops in response to declared public health and/or disaster concerns

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(20) 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 State's 2020-2024 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.

- Firm Commitment of Operating or Rental Assistance - Up to twenty (20) points
- Universal Design - Up to ten (10) points
- Green Design and Energy Efficiency - Up to ten (10) points
- Access to Transportation - Up to ten (10) points
- Neighborhood Assets - A maximum of ten (10) points
- Development Team Characteristics - Up to 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 fifteen (15) 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. IHDA will require under the PSH-RFA that federal HTF-funded projects include leveraging of at least 10% of total projects cost with non-IHDA

resources.

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 State's policy on maximum per-unit subsidy 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 HOME/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 2020-2021 QAP and are valid through 2021. 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. Maximum allowable for 4+bedroom sixe in City of Chicago and Chicago Metro Area is \$351,000 per unit.

2020 HOME Maximum Per-Unit Subsidy Limits

Area Name & Counties	Bedrooms	Elevation Limit
<u>Chicago</u>	0 BR	153,314
Cook, DuPage, Grundy, Kane,	1 BR	175,752
Kendall, Lake, McHenry, and Will	2 BR	213,718
	3 BR	276,482
	4 + BR	303,490
<u>Springfield</u>	0 BR	153,314
Alexander, Bond, Cass, Christian, Clinton, Fayette, Franklin,	1 BR	175,752
Greene, Jackson, Jefferson, Jersey, Johnson, Logan, Macoupin,	2 BR	213,718
Manion, Mason, Massac, Menard, Monroe, Montgomery, Morgan,	3 BR	276,482
Randolph, Perry, Pulaski, Sangamon, Scott, Washington,	4 + BR	303,490
Williamson, and Union		
<u>Champaign</u>	0 BR	153,314
Champaign, Clark, Clay, Coles, Crawford, Cumberland,	1 BR	175,752
De Witt, Douglas, Edgar, Edwards, Effingham, Ford, Gallatin,	2 BR	213,718
Hamilton, Hardin, Joquits, Jasper, Kankakee, Lawrence, Livingston,	3 BR	276,482
Macon, McLean, Moultrie, Plait, Pope, Richland, Saline,	4 + BR	303,490
Shelby, Vermilion, Wabash, Wayne, and White		
<u>East St. Louis</u>	0 BR	153,314
Madison and St. Clair	1 BR	175,752
	2 BR	213,718
	3 BR	276,482
	4 + BR	303,490
<u>Peoria</u>	0 BR	153,314
Bureau, Fulton, Henderson, Henry, Knox,	1 BR	175,752
LaSalle, Marshall, McDonough, Mercer,	2 BR	213,718
Peoria, Pulham, Stark, Tazewell,	3 BR	276,482
Warren, and Woodford	4 + BR	303,490
<u>Quincy</u>	0 BR	153,314
Adams, Brown, Calliburghercock,	1 BR	175,752
Pike, and Schuyler	2 BR	213,718
	3 BR	276,482
	4 + BR	303,490
<u>Rockford</u>	0 BR	153,314
Boone, DeKalb, Stephenson,	1 BR	175,752
and Winnebago	2 BR	213,718
	3 BR	276,482
	4 + BR	303,490
<u>Rock Island</u>	0 BR	153,314
Rock Island	1 BR	175,752
	2 BR	213,718
	3 BR	276,482
	4 + BR	303,490
<u>Sterling</u>	0 BR	153,314
Carroll, Jo Daviess, Lee, Ogle,	1 BR	175,752
and Whiteside	2 BR	213,718
	3 BR	276,482
	4 + BR	303,490

2020 Base Section 234 limits: Effective June 4, 2020

Bedrooms	Elevation
0 BR	63,881
1 BR	73,230
2 BR	89,049
3 BR	115,201
4 + BR	126,454

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 Requirements
- Accessibility Stand which must be met
- Disaster mitigation requirements
- State and Local Codes, Ordinance, 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 Code Package. 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



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ILLINOIS HOUSING DEVELOPMENT AUTHORITY STANDARDS FOR ARCHITECTURAL PLANNING AND CONSTRUCTION

Published July 1, 2019 (Modified 12/11/21)

Effective for all project plans reviewed by the Authority after December, 2020

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

INTRODUCTION

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 the Authority 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.



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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.

Broadband Infrastructure: means cables, fiber optics, wiring, or other permanent (integral to the structure) infrastructure, including wireless infrastructure, that is capable of providing access to internet connections in individual housing units, and that meets the definition of "advanced telecommunications capability" determined by the Federal Communications Commission under section 706 of the Telecommunications Act of 1996 (47 U.S.C. 1302).

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 (CO): 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 Authority's 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.

Construction Contingency or Contingency: Amount of money allocated to the project in the Authority awarded funds available to the project sponsor to pay for construction related items not in the approved construction documents. Value should be equal to 5% of new construction hard costs, and 10% of rehabilitation hard costs. Allocation of these funds shall be in compliance with Section 4.01.

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 surfaces 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



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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 Department of Natural Resources (IDNR) State Historic Preservation Officer or as determined by a "Certified Local Government" designated by the IDNR, 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



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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 Government 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 2015 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, IBC)

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 jams.

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



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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

The Authority 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. The Authority 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. The Authority 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 observation shall be conducted by the "Architect of Record". The Architect is responsible for certifying that all the work requested for payment, at a minimum of one site visit per pay application, 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 Sponsor and overall observation 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 or Certified Revisions may be subject to design and construction costs after the design documents have been completed and approved by the Authority. Any related changes in cost as a result of code related requirements submitted for Authority review will be deemed as an error and omission, and will be handled as described in Section 4 of these standards.



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Architectural Fee, in combination with building engineering fees for structural, mechanical, electrical and fire protections systems as well as Landscape Architecture fees in excess of the Authority limits listed below cannot be kept in basis and may be paid from a non-Authority source.

- 1.07** Architectural and Civil Engineering fees in excess of the Authority limits listed below cannot be kept in basis, and shall be paid from a non-Authority source.

AUTHORITY ARCHITECTURAL FEE LIMITS:

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

AUTHORITY CIVIL ENGINEERING FEE LIMITS:

Set Aside	\$/Gross Site Area
Non-Metro	\$0.35
Rural	\$0.35
Chicago Metro	\$1.00
City of Chicago	\$2.00

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.

- 1.08** Pre-Construction Services performed by a General Contractor shall be considered as acting as a Construction Consultant to the Developer/ Sponsor. All direct costs and fees associated with this service is viewed as consultancy therefore is paid through the Developer Fee as defined in the QAP.
- 1.09** 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. The percentage of each, Profit/Overhead/General Conditions as indicated in the CSS at Initial Closing, shall remain constant throughout the project including any change



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orders. General Conditions. Overhead and Profit shall be paid but equal to the completion of construction percentage as identified in the pay application. Related mobilization charges shall be evaluated on an as needed basis.

- 1.10 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. All General Conditions items listed above must be kept within the allowable percentages and the Authority prefers not to have individual GC related items broken out as separate trade lines on the CSS. If individual items are isolated, the GC line item must be reduced by the individual line value so the sum of the GCs listed and individual line items do not exceed the allowable 6%. Values for these items, if identified by the Authority, are in excess of the allowable percentage, the individual line item values shall be removed from the budget. Redistribution of these values through the remaining trades after being removed from the contract is prohibited.

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. In addition, The Authority may authorize payment to begin ordering elevators for the project, up to 35% of the elevator contract amount, including installation. All requests for deposit payments must be substantiated by an invoice issued by the supplier or subcontractor requesting the deposit and included with the draw in which the request is made. Invoices are not required for all other shop drawing requests.

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 unforeseen, and will be determined to be an error and omission when presented to the Authority for CO Determination as defined in Section 4.

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.

- 1.10 All Construction-Related Costs required to complete the project shall be determined by receiving bids from all trades identified in the construction tab of the application prior to the project obtaining Initial Closing by the Authority. Allowances are not allowed for biddable and definable portions of the project except where discussed and approved by the Authority's Architectural staff prior to Initial Closing. Any allowances identified in the bid shall be indicated as such, and definition of how the allowance was created shall be provided to the Authority for consideration. Any increases to the allowance via change order shall be deemed as an error when presented to the Authority for CO Determination as defined in Section 4. 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 Authority's Architectural and Construction Standards, QAP requirements, etc.) from the scope due to costs will not be approved, and any CO requests to reimburse the contractor for installing items related to these standards will be deemed as error when presented to the Authority for CO Determination as defined in Section 4.

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 the Authority.

The General Contractor shall reduce of the 6% overhead percentage listed above for any self-performed work. The reduction shall equal to the 2% of the trade cost identified as being self performed. All self-performed work anticipated for the project must be identified on the originally submitted CSS for review prior to Initial Closing.

Material suppliers for construction related products shall be identified on the contractors sworn statement 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 Authority's Field Construction Representative.

- 1.11 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.



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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.

1.12 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 2018 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 the Architect of Record 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

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- 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 2018 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 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 Authority financed projects having construction related activities. Section 3 will apply were required. See links below to respective guidelines and websites.
 - Authority 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>



2.18 Broadband Infrastructure: Per Department of Housing and Urban Development Docket No. FR 5890-F-02 Narrowing the Digital Divide, HUD-Funded New Construction and Substantial Rehabilitation of Multifamily Rental requires installation of broadband infrastructure.

CONSTRUCTION PHASE

3) Pre-Closing and Preconstruction Meetings

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 will allow advanced payments for on-site stored materials custom fabricated solely for installation for the funded project. The GC must identify these materials they expect to make early payment requests for prior to Initial Closing for Authority review. Each item shall be included as a special endorsement on the GC's *Builder's Risk Insurance* policy. Common materials such as gypsum board, plumbing piping, lumber, steel studs, hardware, off-the-shelf items, etc., are not considered custom materials and will only be approved for payment after installation. Proper invoices indicating the quantity of the material stored on site must be provided at the time of the payment request in order to allow the field representative to verify the quantity matches the request.
 - The Authority will not allow for early payment of materials stored off-site without approval from the Construction Services Staff prior to Initial Closing. Any material granted advanced payment are subject to the following additional requirements:
 - Evidence that the Stored Materials are in the care, custody and control of the Owner, or the Owner's General Contractor on behalf of and under the direction of the Owner;
 - Allow the Authority's field representative to confirm the Stored Materials are stored and cared for in a safe and secure location;
 - Endorsement of either applicable amendment to the builders risk insurance policy for the Development insuring for the theft and damage to materials on site, installed, at a temporary location and/or transit;
 - The Guarantors shall guaranty to the Authority payment for replacement of stored materials in the event of theft or damage.

The Authority will deny any request where the owner and general contractor does not agree to these terms at the time of the request. All fees associated with these requirements must be included in the development cost of the project, and if a change order is received to pay for expenses related to them will be deemed as an error and omission once the CO is reviewed. Proper invoices indicating the quantity of the material stored must be provided at the time of the payment request in order to allow the field representative to verify the quantity matches the request.

- Furniture, fixtures and equipment (FF&E) will not be paid for until installed and observed to be in place by the Authority's Construction Field Representative, and does not qualify for the advance deposit payment policy listed above.
- Retention reduction: 10% retention must be retained up to 95% completion, then may be reduced to 5% if the building is occupiable, has a C of O, a completed AIA form G704, Authority's Permission to Occupy, Authority's Completion Certificate and the Authority's Field



Representative approval. Retention shall apply to all trade labor and material costs, General Conditions, Overhead and Profit and all change orders, but does not apply to insurance, bonds and permits. For single family and scattered site projects only, The Authority 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 Authority's Permission to Occupy, Authority Completion Certificate and the Authority's 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 five 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 Contract Exclusions and Value Engineering

- The project team must address the potential for additional General Contractor exclusions or value engineering on the project during the plan review process and prior to the pre-closing meeting.
- The Authority shall receive a list of all such items including stated values for each item removed from the reviewed documents.
- Exclusions or value engineering items deemed acceptable to the Authority must be fully coordinated with the final set of construction documents received by the Authority prior to issuance of the plan review approval.
- The final contract lump sum value, at Initial Closing of the project, must reflect inclusion of these items. Excluded items may return to the project scope after construction has started as project betterments, but only for the value equal to the credit received at the time of removal from the project prior to Initial Closing.

3.04 Payout Procedures

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

4) Change Orders and Contingency Funds

A Change Order (CO) can originate from the project Sponsor, Architect or General Contractor. When a Sponsor receives or creates a request for a CO, they shall direct their Architect and GC to certify the requested items are not already included in the approved plans, specifications or various contract documents. The Authority will review the CO following the procedure outlined below.

The Sponsor will submit the following complete Change Order Packet (CO Packet) to the Field Representative:

- An unexecuted copy of the AIA G701 Change Order form
- A letter from the Architect clearly explaining the reasons for the CO
- Any other documents to justify the change, including the GC's documentation of before and after conditions, with photos, if applicable
- Any other documents to support the value of the change

The Construction Field Representative will:

- Verify the pre-existing condition
- Review the proposed change to the scope of work
- Forward the CO Packet to the Authority's Architectural Staff for review



The Architectural Staff will:

- Review the CO Packet to make a Change Order Determination (CO Determination) as to whether the change is either:
 - an unforeseen condition, or
 - a project betterment, or
 - an error or omission
- The Architecture Staff will inform the Construction Field Representative of the CO Determination, who will then notify the Sponsor.
- It is estimated the Architectural Staff will return a CO Determination 15 days from when a completed CO Packet is received by the Construction Field Representative.

After receiving the CO Determination, the Sponsor will:

- Follow the General CO Provisions, as stated in 4.01.
- Submit a CO Packet including the fully executed version of the AIA G701 and all required pricing back up included to achieve the CO Determination with the next draw package
- Allocate funds as necessary, including the use of construction Contingency, to fund the CO on the next draw.
- Properly show the CO value on the on the OSS and CSS.

4.01 General Change Order and Construction Contingency Provisions

Sponsors must comply with the following CO and Construction Contingency usage provisions:

- COs must be submitted 30 days prior to inclusion within a construction draw package.
- Contingency exists solely to support the trade costs incurred with the construction of the project, and only to fund project related construction, rehabilitation or related site work after receiving the CO Determination.
- Contingency does not exist to fund items including, but not limited to, off-site improvements, soft costs, vehicles, developer fees, resident services, management and operations, items not related to the project, or other non-construction items.
- The Sponsor assumes all risk (both monetary and construction rework) in completing CO work without prior CO Determination.
- The Sponsor is responsible to pay for any CO submitted after exhausting all Contingency funds.
- The Authority will not provide any additional project funding after expending all Contingency funds.
- Contingency funds are available only to the Sponsor and shall be reflected accordingly on the OSS.
- Contractors shall not include any Contingency amount in their bid whatsoever.
- Contractors and Sponsors shall not enter into any agreement accessing or splitting Sponsor Contingency or trade line savings. There shall be no utilization of cost savings without Authority approval.
- The Authority will maintain a log of CO Determinations for every project and will evaluate future funding awards based on the criteria listed below.
- The Authority retains the right to deny funding for any CO made in a fraudulent manner not in alignment with the rules listed above.

4.02 The following criteria will be used for a CO Determination of an unforeseen condition:

- a. Concealed Condition – Unforeseen items revealed as a part of normal construction activity either underground, within walls or hidden from view prior to removal of existing items not anticipated as part of the original design, and are not shown within the approved construction documents. The Authority expects the design team to have completed an adequate amount of selective demolition for renovation projects to properly anticipate concealed conditions prior to the completion of the construction documents.
- 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



- 4.03 The following criteria will be used for a CO Determination of a project Upgrade (Betterments):
- Improvement made in the design material quality, quantity or performance to provide a better environment for the residents than what is represented in the approved construction documents
 - Additional scope items to improve the project not shown on the approved construction documents
- 4.04 The following criteria will be used for a CO Determination of an error or omission:
- Contractor Negligence – Any damage or neglect by the Contractor occurring as part of the general construction of the project, or during delivery of materials.
 - Building Code Related Issues – are foreseeable costs, which should have been included within the project's original design to meet local code restrictions.
 - Architects, Engineers and Contractors Errors and Omissions and Additional Architectural and Engineering Fees – design items which are not coordinated within the approved construction documents, or missing materials which would be necessary to complete proper construction or maintain a product warranty.
 - Building Inspector or any Municipal Official Requirements – if not required by the Building Code, but are required for building occupancy by a field inspector. These are items the Sponsor would normally be responsible to pay for regardless of the timing of the requirements, but should have been investigated prior to construction commencing by either the architect or contractor.
 - Separate contracts outside of the General Contract: When a separate contract is let by the Sponsor for work to be performed outside of the General Contractor's Scope of work resulting in additional incurred costs. A separate Contingency is required for separate contracts.
 - 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. This includes cost to cover insurance deductibles, as the responsible party is responsible to cover their own insurance deductibles as their cost of doing business.
 - Seasonal Constraints- such as winter conditions, water extraction from recent rains or other costs that could result in scheduling delays. These items should be anticipated and included in the original construction budget, or paid through available General Conditions costs.
 - Other: Any additional architectural, engineering, or other services outside of the scope of work that may be required. This includes construction related delays or time extensions resulting from additional scope, extended warranties, contractor incentives, or overtime or premium time.
 - If an item classified as an error or omission, it is the Authority's position the Sponsor should review the CO and reconsider if it is worthy of an increase in the contract value. We encourage the project Sponsor to review their contract as well as the General Conditions to the Contract and take proper action under these documents prior to agreeing to funding the CO through Contingency funds.
 - The Authority retains the right to penalize the project team under the participant scoring section of the QAP for all future applications if any project allocates a total equal to or greater than 20% of the Contingency for items deemed as errors and omissions.

5) Construction Close Out

Prior to final project close out, several criteria must be met for the Authority's 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).
- Signed PDF copy of the A.I.A. G704 must be submitted to the Construction Field Representative and any punch list items (Punch list cost multiplied by 150% to be held in escrow).



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- Digital Signed PDF copy of the *Authority's* Permission to Occupy must be submitted to the Construction Field Representative. This form can be found at: <http://www.ihda.org/developer/architectureConstructionServices.htm>
- The *Authority's* Construction Field Representative approval.
- All Prevailing Wage, Davis Bacon, Certified Payrolls & Section 3, Compliance requirements are met and satisfied.
- Environmental clearance required by Demolition – (i.e. Asbestos and Lead Base Paint clearance report & O&M manual – are received by the Authority.
- For projects receiving tax credits for Universal Design and/or Green Initiatives, the Authority's Architectural Services final inspection approval of the items identified for scoring.
 - a. At final project closeout: Projects awarded funding based on scoring in any green category must submit the applicable 3rd party certification, green maintenance/tenant manual, and videos (if applicable).

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

DESIGN PHASE

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 *Authority's* Board.

Before construction begins, submit a compiled, sealed and signed digital unlocked, editable PDF copy of the complete "For Construction" drawings, specifications and supporting documents to the Authority on a flash drive. 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 Authority shall receive the review drawings, specs and supporting documents 60 days prior to the scheduled Initial Closing date. Please note, it is anticipated all drawings will be submitted through the IHDA Connect online portal when it is available, and submission of a flash drive will be unnecessary. Please continue submitting drawings via flash drive until this is available.

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 drawings must be coordinated between all design disciplines and the final contract for construction including all value engineering items and General Contractor exclusions. In addition, the project drawings must be

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current (≤ 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 with selected plant species.
 - 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 bathroom, accessible, adaptable and sensory impaired units), types and sizes.
 - Site plan, including parking data and layouts and property lines.
 - Demolition Plans as applicable
 - Floor plans.
 - Reflected ceiling plans
 - Building elevations.
 - Interior Kitchen and Bath elevations, as well as other interior elevations required to identify areas receiving special design consideration. Including allowable space of 24" above range/stove to combustible surfaces and coordinated location of accessibility features
 - Wall sections and enlarged details.
 - 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.
 - Floor framing plans, roof framing plan, wood truss and 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.
- 6.05 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 including duct sealing and insulation as required in the current IECC.
 - Equipment schedules.



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- 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 current 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 and other governing codes and ordinances.
 - Location of all lighting fixtures and compliance with all lighting levels for each usable space
 - 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 2018 International Energy Conservation Code with Illinois Amendments. (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, warranty 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 (≤ six months old) ALTA/NSPS Land Title Survey.
- 6.16 A current (≤ 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.

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- 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 Authority's Phase I Environmental Consultant Report Requirements. This form may be found on the Authority's website (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 Authority's PNA standards can be found on the Authority website. (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
- Painting of all units and Common areas.

The completed project drawings must be current (≤ three months old) and include the following:

6.17 Complete Civil Engineering Drawings, including, but not limited to:

- Location map.
- 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 with selected plant species.
 - 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 and property lines.
 - 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.
 - Interior Kitchen and Bath elevations, as well as other interior elevations required to identify areas receiving special design consideration, including allowable space above range/stove to combustible surfaces and coordinated location of accessibility features. Cutsheets for all Appliances. 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 including duct sealing and insulation as required in the current IECC.
 - 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 and other governing codes and ordinances.
 - 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.
 - Lighting Fixture Schedules.
 - 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 (≤ six months old) ALTA/NSPS Land Title Survey
- 6.29 A current (≤ 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 Authority's 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/>
- 6.31 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 **Authority's** 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, access control for circulation, etc. Keyed or fobbed door hardware only do not satisfy this amenity.
- The capability for each unit to access high-speed internet either through wireless service to all residents or hard-wire connection.
- The installation of a broadband infrastructure for HUD-funded projects.
- Window treatments for each unit, such as mini blinds or curtains and insect screen.
- 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 at least 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 the Authority. 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.



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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 233, Multi-Story Housing requirements Section 233.6.5, Requirements for Adaptable Dwelling Units of The Illinois Accessibility Code. Renovation projects must comply with Section 233.3.4 of the Code to determine the level of accessibility required.

<https://www2.illinois.gov/cdb/announcements/2018/Documents/Register%20Page.pdf>

8.03 ICC/ANSI A117.1-Latest Edition:

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

https://www.ihda.org/wp-content/uploads/2017/10/2018-2019_QAP_Final.pdf

8.04 Section 504 of the 1973 Rehabilitation Act:

Projects that receive federal financial assistance (HOME, National Housing Trust Fund, Risk Share, Section 811, 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.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, community room kitchen, public toilet rooms, lobbies and corridors, etc. shall comply with the requirements of The Americans with Disabilities Act (latest edition):

<https://www.ada.gov/reg2010/2010ADASTandards/2010ADASTandards.htm>

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, Section 233.6.5, 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, Section 233.6.5, 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 in compliance with ICC/ANSI A117.1 Section 1103 Type 'A' Units 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 designed to the Type 'A' unit standard. 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 whenever practical and feasible, rehabilitation projects. 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%. For single family and townhome units, POA does not include an attached garage. Access should be from the public walk or public parking. Main entrance is the front door.
- 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 1/2" difference between the inside and outside surfaces, or with a threshold with less than a 1/2" 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 1104.11.3.1.2 and 1104.11.3.1.2 of ICC/ANSI A117.1, latest edition.

10) Site Standards



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- 10.01 All projects shall include proper stormwater design 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/mph/4910.7
- 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 (SRD): 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

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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 metal 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 not including SRQ 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



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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
Single Room Occupancy (SRO) Unit:	
<ol style="list-style-type: none"> 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, <u>excluding</u> the floor areas for bathrooms, toilet rooms, laundries, pantries, foyers, corridors, storage spaces, stairways and closets. 2. Any SRO project must include both a private bathroom including a sink, toilet and bathing facilities and a kitchen within the unit. 	
Exception: 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.	

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.

12.02 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.

12.03 Carpet shall not be permitted as a floor finish in laundry areas, kitchens, and bathrooms.

12.04 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 closers, 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 access.

13) Mechanical, Plumbing, Fire Protection and Electrical Systems

All HVAC, plumbing, Fire Protection and electrical floor and wall penetrations must be properly sealed to maintain both the proper fire rating as required by the applicable building code, and/or acoustic control of adjacent spaces.

Heating, ventilating, and air-conditioning systems;

13.01 All units shall be heated and air-conditioned. Design of the system shall be such to maintain a consistent temperature in all habitable spaces evenly throughout the day. 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, 2018 edition shall apply. They shall also comply with the efficient utilization of energy in accordance with the 2018 edition of the International Energy Conservation Code with Illinois Amendments. 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

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fuel gas-fired venting systems shall be in accordance with the 2018 edition of the International Fuel Gas Code or the local building code whichever is most stringent.

- 13.03 Any change orders submitted requiring changes to mechanical room design as a result of layouts not complying with code or equipment manufacturer clearance requirements will be determined to be errors and omissions, and subject to the requirements of Section 4, it is expected coordination of all equipment clearances is complete prior to submitting design documents for review.

Plumbing

- 13.04 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.
- 13.05 No Project shall be served by a well or septic system.
- 13.06 All plumbing work shall be performed only by Illinois licensed plumbers and apprentice plumbers under the direction of a licensed plumber.
- 13.07 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.
- 13.08 On renovation, rehabilitation or preservation projects, replacement of the lead pipe incoming water service shall be required.
- 13.09 Water distribution piping from the water meter throughout the building shall be "Type K" or ductile iron for below ground piping, and copper or PEX for above ground piping. CPVC or Polybutylene water distribution pipe shall not be permitted. PEX piping below grade shall be allowed to be installed following industry best practices) and code requirements.
- 13.10 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

- 13.11 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.
- 13.12 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.
- 13.13 The minimum electric service to a dwelling unit shall be 60-amperes. Appropriately sized and rated, existing electrical service may be allowed to remain for apartment unit rehabilitations. A load calculation for the each unit of the proposed design should be provided to ascertain if the service is properly sized for the project.
- 13.14 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.
- 13.15 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.
- 13.16 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.



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- 13.17 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.
- 13.18 Exposed conduit is prohibited unless concealment of the conduit is not physically possible. Contact The Authority in the design stage for prior approval. If approved, the conduit or Wiremold must be painted to match the mounting surface.
- 13.19 Family projects shall have tamperproof receptacles in all rooms except for utility rooms and garage. In renovation projects receptacles shall be replaced were technically feasible.

Fire Protection Systems

- 13.20 Fire protection systems, if required by code, must be properly priced to include all equipment and accessories required for a fully operational system for the building. This value shall be represented on the CSS submitted for review prior to initial Closing of the project.
- 13.21 The price of the system included on the CSS must meet all applicable code requirements. Change orders requiring additional expenses related to the fire protection system, if as a result of code compliance after Initial Closing, will be classified as errors and omissions.
- 13.22 Exposed piping of fire protection systems is prohibited unless concealment is not physically possible. Contact the Authority in the design stage for prior approval. If approved, the pipe must be painted to match the mounting surface.

14) Energy Efficiency and Green Criteria

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

14.01 Minimum 2018 Illinois Energy Conservation Code Design Requirements

This section outlines some of the energy code compliance requirements based upon the prescriptive option of the Illinois 2018 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.ildeco.net/energycode or www.iccsafe.org.

A quick reference guide for the 2018 IECC can be found at: www.reca-codes.com Single Family and Low Rise Residential Buildings, 3 Stories or Less										
2018 IECC: Table R402.1.2 for Climate zones 4 and 5										
Climate Zone	Windows			Insulation				Foundation		
	Fenestration U-Factor	Skylight U-Factor	Gazing 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	8/13	19	10/13	10, 2ft	10/13

NR Indicates No Requirements

a Air Leakage - 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.



The Authority 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, where applicable, shall be provided to the Authority for review prior to approval of the final closing pay request.

- 14.02 Additional Mandatory Design Requirements above the 2018 Illinois Energy Conservation Code
All projects seeking funding from the Authority must comply with the following criteria. If projects are seeking 3rd 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 3rd party certification requirements will supersede the mandatory requirement outlined below.

Authority Mandatory Requirements	
Requirement	Mandatory Section
Site Improvements	<p>Landscaping: 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: Authority approval will be required for the amount of landscaping provided for projects where the open land for landscaping is limited.</p>
Water Conserving Fixtures	<p>(New Construction Only): 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>(Rehab Only): 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>
Energy Efficiency	<p>Energy Star Appliances: Install Energy Star Certified clothes washers, dishwashers, range hoods, refrigerators, bathroom exhaust and electric dryers.</p>



Operation and Maintenance	Building Maintenance Manual: 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
	Warranty Matrix Provide a matrix outlining the warranty period for all items and systems covered

14.03 New technologies: New technologies (items such as: alternative building systems, new design components and/or materials, etc.) for the purposes of decreasing operating costs must be proven and not experimental. Any new technology incorporated for energy savings will need to be justified through a cost benefit analysis. Applicable new technologies shall include any proposed efficiencies in excess of those indicated in the 2018 International Energy Conservation Code/ASHRE Standard 90.1-2010, the Authority 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 Authority underwriting forecasting assumptions and shall incorporate maintenance costs, adjustments for any needed life cycle repairs and/or reserves.

15) Community Facilities

- 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 All projects must include bulk storage areas 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
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- 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. Exterior bike racks, if used, must be anchored and have the requisite space for a parked bike which will not reduce the required width of an accessible path or parking stall.

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. 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.



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- 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 the Authority 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 of 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

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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.

Water distribution piping from the water meter throughout the building shall be "Type K" for below ground piping, and "Type M" copper or PEX for above ground piping. CPVC and Polybutylene water distribution pipe shall not be permitted. PEX piping shall be allowed to be installed below floor slabs as allowed by code and industry best practices.

- 19.08 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 and Polybutylene water distribution pipe shall not be permitted. PEX piping shall be allowed to be installed below floor slabs as allowed by code and industry best practices.
- 19.09 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.
- 19.10 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.
- 19.11 The minimum electric service to the dwelling unit shall be 60-amperes.



ADDENDUMS

20) General Contractor Certification

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 charged 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 firm's 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.

Name _____ Position _____ Date _____



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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.

(vi) Broadband infrastructure. For new commitments made after January 19, 2017 for a new construction housing project of a building with more than 4 rental units, the construction must include installation of broadband infrastructure, as this term is defined in 24 CFR 5.100, except where the participating jurisdiction determines and, in accordance with § 92.508(a)(3)(iv), documents the determination that:

- (A) The location of the new construction makes installation of broadband infrastructure infeasible; or
- (B) The cost of installing the infrastructure would result in a fundamental alteration in the nature of its program or activity or in an undue financial burden.



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(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:

(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.



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(x) Broadband infrastructure. For new commitments made after January 19, 2017 for a substantial rehabilitation project of a building with more than 4 rental units, any substantial rehabilitation, as defined in 24 CFR 5.100, must provide for installation of broadband infrastructure, as this term is also defined in 24 CFR 5.100, except where the participating jurisdiction determines and, in accordance with § 92.508(a)(3)(iv) documents the determination that:

(A) The location of the substantial rehabilitation makes installation of broadband infrastructure infeasible;

(B) The cost of installing broadband infrastructure would result in a fundamental alteration in the nature of its program or activity or in an undue financial burden; or

(C) The structure of the housing to be substantially rehabilitated makes installation of broadband infrastructure infeasible.

(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 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.



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(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.

[78 FR 44670, July 24, 2013, as amended at 81 FR 92635, Dec. 20, 2016]

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).



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(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



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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**
- ☐ Broadband infrastructure
- ☐ **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**
- ☐ Broadband infrastructure
- ☐ 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

Bathrooms

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

Cabinetry

Kitchen cabinets 15–20
Medicine cabinets and bath vanities 20

Closet Systems

Closet shelves Lifetime

Countertops

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

Wood/butcher block 20+

Granite 20+

Solid Surface 20+

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

Electrical

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

Finishes Used for Waterproofing

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



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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



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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) 40–
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.593.901 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.

(vi) Broadband infrastructure. For new commitments made after January 19, 2017 for a new construction housing project of a building with more than 4 rental units, the construction must include installation of broadband infrastructure, as this term is defined in 24 CFR 5.100, except where the



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grantee determines and, in accordance with § 93.407(a)(2)(iv), documents the determination that:

(A) The location of the new construction makes installation of broadband infrastructure infeasible, or

(B) The cost of installing broadband infrastructure would result in a fundamental alteration in the nature of its program or activity or in an undue financial burden.

(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.



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(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.

(x) Broadband infrastructure. For new commitments made after January 19, 2017 for a substantial rehabilitation project of a building with more than 4 rental units, any substantial rehabilitation, as defined in 24 CFR 5.100, must provide for installation of broadband infrastructure, as this term is also defined in 24 CFR 5.100, except where the grantee determines and, in accordance with 5 93.407(a)(2)(iv), documents the determination that:

(A) The location of the substantial rehabilitation makes installation of broadband infrastructure infeasible;

(B) The cost of installing broadband infrastructure would result in a fundamental alteration in the nature of its program or activity or in an undue financial burden; or

(C) The structure of the housing to be substantially rehabilitated makes installation of broadband infrastructure infeasible.

(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., 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 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 203.43(c)(4). 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 § 92.301, as applicable.

(e) Ongoing property condition standards: Rental housing -

(1) Ongoing property standards. The grantee must establish property standards for rental housing (including manufactured housing) that apply throughout the affordability period. The standards must ensure that owners maintain the housing as decent, safe, and sanitary housing in good repair. The grantee's description of its property standards must be in sufficient detail to establish the basis for a uniform inspection of HTF rental projects. The grantee's ongoing property standards must address each of the following:

(i) At a minimum, the grantee's ongoing property standards must include all inspectable items and inspectable areas specified by HUD based on the HUD physical inspection procedures (Uniform Physical Condition Standards (UPCS)) prescribed by HUD pursuant to 24 CFR 5.705.

(ii) Health and safety. The grantee's standards must require the housing to be free of all health and safety defects. The standards must identify life-threatening deficiencies that the owner must immediately correct and the time frames for addressing these deficiencies.

(iii) Lead-based paint. The grantee's standards must require the housing to meet the lead-



based paint requirements in 24 CFR part 35.

(2) Inspections. The grantee must undertake ongoing property inspections, in accordance with § 93.404.

(3) Corrective and remedial actions. The grantee must have procedures for ensuring that timely corrective and remedial actions are taken by the project owner to address identified deficiencies.

(4) Inspection procedures. The grantee must establish written inspection procedures. The procedures must include detailed inspection checklists, description of how and by whom inspections will be carried out, and procedures for training and certifying qualified inspectors. The procedures must also describe how frequently the property will be inspected, consistent with section § 93.404(d).

(f) Environmental provisions -

(1) New construction projects environmental requirements -

(i) Historic preservation -

(A) Standards. The project activities (including demolition) must not be performed on properties that are either listed in or determined eligible for listing in the National Register of Historic Places, unless the project activities meet the Secretary of the Interior's Standards for Rehabilitation, either as certified through the Federal and/or State historic rehabilitation tax credit programs or as verified by someone that meets the relevant Secretary of the Interior's Professional Qualification Standards.

(B) Archaeological resources. If archaeological resources or human remains are discovered on the project site during construction, the grantee must consult with affected tribes and/or descendant communities and comply with the Native American Graves Protection and Repatriation Act (25 U.S.C. 3001-3013), State law and/or local ordinance (e.g., State unmarked burial law).

(ii) Farmland. Project activities must not result in the conversion of unique, prime, or statewide or locally significant agricultural properties to urban uses.

(iii) Airport zones. Projects are not permitted within the runway protection zones of civilian airports, or the clear zones or accident potential zones of military airfields.

(iv) Coastal Barrier Resource System. No projects may be assisted in Coastal Barrier Resource System (CBRS) units. CBRS units are mapped and available from the U.S. Fish and Wildlife Service.

(v) Coastal zone management. Development must be consistent with the appropriate State coastal zone management plan. Plans are available from the local coastal zone management agency.

(vi) Floodplains. Except as modified below, definitions for terms used below can be found at 24 CFR part 55.

(A) Construction and other activities in the 100-year floodplain are to be avoided when practicable. If there are no practicable alternatives to new construction or substantial improvement in the 100-year floodplain, the structure must be elevated at least the base flood elevation (BFE) or floodproofed to one foot above the BFE. Elevated and floodproofed buildings must adhere to National Flood Insurance Program standards. The primary sources of floodplain data are Federal Emergency Management Agency (FEMA) Flood Insurance Rate Maps (FIRMs). When FEMA provides interim flood hazard data, such as Advisory Base Flood Elevations (ABFE) or preliminary maps or studies, the latest of these sources shall be used.

(B) No HTF assistance may be approved with respect to:

(1) Any action, other than a functionally dependent use, located in a floodway;

(2) Any new construction critical action located in a coastal high hazard area, 100- or 500-year floodplain; or

(3) Any non-critical new construction action in a coastal high hazard area, unless the action is reconstruction following destruction caused by a disaster and is designed for location in a coastal high hazard area consistent with the FEMA National Flood Insurance Program requirements for V-Zones.

(vii) Wetlands.

(A) No draining, dredging, channelizing, filling, diking, impounding, or related grading activities are to be performed in wetlands. No activities, structures, or facilities funded under this program are to adversely impact a wetland.

(B) A wetland means those areas that are inundated by surface or ground water with a frequency sufficient to support, and under normal circumstances, does or would support a prevalence of



vegetative or aquatic life that requires saturated or seasonally saturated soil conditions for growth and reproduction. Wetlands generally include swamps, marshes, bogs, and similar areas such as sloughs, potholes, wet meadows, river overflows, mud flats, and natural ponds. This definition includes those wetland areas separated from their natural supply of water as a result of activities, such as the construction of structural flood protection methods or solid-fill road beds, or mineral extraction and navigation improvements. This definition is independent of the definition of jurisdictional wetland used by the U. S. Army Corps of Engineers under section 404 of the Clean Water Act (33 U.S.C. 1251 et seq.).

(viii) Explosives and hazards. Projects must be in compliance with the standards for acceptable separation distance, as set forth at 24 CFR part 51, subpart C.

(ix) Contamination. All properties assisted with HTF funds must be free of hazardous materials, contamination, toxic chemicals and gases, and radioactive substances, where a hazard could affect the health and safety of occupants or conflict with the intended use of the property.

(A) All proposed multifamily (more than four housing units) HTF projects require a Phase I Environmental Site Assessment (ESA-ASTM). If the Phase I ESA identifies recognized environmental concerns (RECs), a Phase II (ESA-ASTM) will be required. ASTM reports shall be prepared in accordance with the most current ASTM standard. Single family housing does not require a Phase I ESA.

(B) HTF projects must avoid sites located within 0.25 miles of a Superfund or CERCLIS (Comprehensive Environmental Response, Compensation, and Liability Information System) site or other contaminated site reported to Federal, State, or local authorities without a statement in writing from the U.S. Environmental Protection Agency (EPA) or the appropriate State agency that there is no hazard that could affect the health and safety of the occupants or conflict with the intended use of the property.

(x) Noise.

(A) Internal noise levels: All activities will be developed to ensure an interior noise level of no more than 45 decibels (dB).

(B) External noise levels:

(1) Project sites exposed to less than or equal to 65 dB of environmental noise are acceptable.

(2) Sites between 65 dB and less than 75 dB are acceptable with mitigation (e.g., noise walls, careful site planning) that result in an interior standard of 45 dB.

(3) Locations with environmental noise levels of 75 dB or greater may not have noise sensitive outdoor uses (e.g., picnic areas, tot lots, balconies, or patios) and require sound attenuation in the building shell to achieve the 45 dB interior standard.

(xi) Endangered species. The grantee must avoid all actions which could jeopardize the continued existence of any endangered or threatened species, as designated by the U.S. Fish and Wildlife Service or National Marine Fisheries Service, or would result in the destruction or adversely modify the designated critical habitat of such species.

(xii) Wild and scenic rivers. The grantee must avoid activities that are inconsistent with conservation easements, land-use protections, and restrictions adjacent to wild and scenic rivers, as designated/listed by the Departments of Agriculture or Interior. Maps for the National Wild and Scenic Rivers System are available at the governing departments.

(xiii) Safe drinking water. Projects with a potable water system must use only lead-free pipes, solder, and flux.

(xiv) Sole-source aquifers. Project activities should avoid sites and activities that have the potential to contaminate sole source aquifer areas (SSAs). EPA defines a sole or principal source aquifer as an aquifer that supplies at least 50 percent of the drinking water consumed in the area overlying the aquifer. If the project overlies an SSA, EPA must review the project. EPA review is designed to reduce the risk of ground water contamination that could pose a health hazard to those who use it.

(2) Rehabilitation projects environmental requirements -

(i) Historic preservation.

(A) The project activities (including demolition) must not be performed on properties that are either listed in or determined eligible for listing in the National Register of Historic Places, unless the project activities meet the Secretary of the Interior's Standards for Rehabilitation, either as certified through the Federal and/or State historic rehabilitation tax credit programs or as verified by someone that meets the



relevant Secretary of the Interior's Professional Qualification Standards;

(B) Archaeological resources. If archaeological resources or human remains are discovered on the project site during construction or rehabilitation, the grantee must consult with affected tribes and/or descendant communities and comply with the Native American Graves Protection and Repatriation Act (25 U.S.C. 3001-3013), State law, and/or local ordinance (e.g., State unmarked burial law).

(ii) Farmland. Project activities must not result in the conversion of unique, prime, or locally significant agricultural properties to urban uses.

(iii) Airport zones. Projects are not permitted within the runway protection zones of civilian airports, or the clear zones or accident potential zones of military airfields.

(iv) Coastal Barrier Resource System. No projects may be assisted in Coastal Barrier Resource System (CBRS) units. CBRS units are mapped and available from the U.S. Fish and Wildlife Service.

(v) Coastal zone management. Development must be consistent with the appropriate State coastal zone management plan. Plans are available from the local coastal zone management agency.

(vi) Floodplains. Except as modified below, definitions for terms used below can be found at 24 CFR part 55.

(A) Construction and other activities in the 100-year floodplain are to be avoided when practicable. If there are no practicable alternatives to new construction or substantial improvement in the 100-year floodplain, the structure must be elevated at least to the base flood elevation (BFE) or floodproofed to one foot above the BFE. Elevated and floodproofed buildings must adhere to National Flood Insurance Program standards. The primary sources of floodplain data are Federal Emergency Management Agency (FEMA) Flood Insurance Rate Maps (FIRMS). When FEMA provides interim flood hazard data such as Advisory Base Flood Elevations (ABFE) or preliminary maps or studies, the latest of these sources shall be used.

(B) No HTF assistance may be approved with respect to:

(1) Any action, other than functionally dependent uses, located in a floodway;

(2) Any critical action located in a coastal high hazard area, 100- or 500-year floodplain; or

(3) Any non-critical action located in a coastal high hazard area, unless the action is designed for location in a coastal high hazard area consistent with the FEMA National Flood Insurance Program requirements for V-Zones. "Any non-critical action in a coastal high hazard area, unless the action is reconstruction following destruction caused by a disaster and is designed for location in a coastal high hazard area consistent with the FEMA National Flood Insurance Program requirements for V-Zones."

(vii) Wetlands. No rehabilitation of existing properties that expands the footprint into a wetland is allowed. A wetland means those areas that are inundated by surface or ground water with a frequency sufficient to support, and under normal circumstances, does or would support a prevalence of vegetative or aquatic life that requires saturated or seasonally saturated soil conditions for growth and reproduction. Wetlands generally include swamps, marshes, bogs, and similar areas such as sloughs, potholes, wet meadows, river overflows, mud flats, and natural ponds. This definition includes those wetland areas separated from their natural supply of water as a result of activities such as the construction of structural flood protection methods or solid-fill road beds and activities such as mineral extraction and navigation improvements. This definition is independent of the definition of jurisdictional wetland used by the U.S. Army Corps of Engineers under section 404 of the Clean Water Act (33 U.S.C. 1251 et seq.).

(viii) Explosives and hazards. If the rehabilitation of the building increases the number of dwelling units, then the project must be in compliance with the standards for acceptable separation distance as set forth at 24 CFR part 51, subpart C.

(ix) Contamination. All properties assisted with HTF funds must be free of hazardous materials, contamination, toxic chemicals and gases, and radioactive substances, where a hazard could affect the health and safety of occupants or conflict with the intended use of the property.

(A) All proposed multifamily (more than four housing units) HTF project activities require a Phase I Environmental Site Assessment (ESA - ASTM). If the Phase I ESA identifies recognized environmental concerns (RECs), a Phase II (ESA-ASTM) will be required. ASTM reports shall be prepared in accordance with the most current ASTM standard. Single family housing does not require a Phase I ESA.

(B) HTF projects must avoid sites located within 0.25 miles of a Superfund or CERCLIS



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(Comprehensive Environmental Response, Compensation, and Liability Information System) site or other contaminated site reported to Federal, State, or local authorities without a statement in writing from EPA or the appropriate State agency that there is no hazard that could affect the health and safety of the occupants or conflict with the intended utilization of the property.

(x) Noise -

(A) Internal noise levels. All activities will be developed to ensure an interior noise level of no more than 45 decibels (dB).

(B) [Reserved].

(xi) Endangered species.

(A) The grantee must avoid all actions that could jeopardize the continued existence of any species designated by the U.S. Fish and Wildlife Service or National Marine Fisheries Service as endangered or threatened.

(B) The grantee must avoid all actions that adversely modify the critical habitat of such species.

(xii) Wild and scenic rivers. The grantee must avoid activities that are inconsistent with conservation easements, land-use protections, and restrictions adjacent to wild and scenic rivers, as designated/listed by the Departments of Agriculture and Interior. Maps for the National Wild and Scenic Rivers System are available at the governing departments.

(xiii) Safe drinking water. Projects with a potable water system must use only lead-free pipes, solder, and flux.

(xiv) Sole-source aquifers. Project activities should avoid sites and activities that have the potential to contaminate sole source aquifer areas (SSAs). The EPA defines a sole or principal source aquifer as an aquifer that supplies at least 50 percent of the drinking water consumed in the area overlying the aquifer. If the project overlies an SSA, the EPA must review the project. The EPA review is designed to reduce the risk of ground water contamination, which could pose a health hazard to those who use it.

(3) Acquisition projects environmental requirements.

(i)

(A) Existing housing that is acquired with HTF funds, and has been newly constructed or rehabilitated less than 12 months before the commitment of HTF funds must meet the property standards at paragraph (f)(1) of this section.

(B) All other existing housing that is acquired with HTF assistance must meet the property standards requirements of paragraph (f)(2) of this section.

(ii) If under paragraph (f)(3)(i)(A) or paragraph (B) of this section, the property does not meet these standards, with the exception of the noise standards in paragraph (f)(2) of this section, HTF funds cannot be used to acquire the property.

(4) Manufactured housing environmental requirements. Manufactured housing is subject to the environmental standards in paragraph (f)(1) of this section for new construction or paragraph (f)(2) of this section for rehabilitation, as applicable. If an existing property does not meet these standards, HTF funds cannot be used to acquire the property unless it is rehabilitated to meet the standards in paragraph (f)(2), as applicable, with the exception of noise standards in paragraph (f)(2)(x).

[60 FR 5220, Jan. 30, 2015, as amended at 81 FR 92636, Dec. 20, 2016]

Article VI. §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).



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(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 non-construction 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]



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



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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**
- ☐ Broadband Infrastructure
- ☐ **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**
- ☐ Broadband Infrastructure
- ☐ **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. 4821-4846); the Residential Lead-Based Paint Hazard Reduction Act of 1992.

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 an NHTF project is also allocated LIHTCs 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 improved 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 Federal Housing Trust Fund Substantial Amendment to the State of Illinois Consolidated Plan - 2021 Annual Action Plan

The Illinois Housing Development Authority (IHDA) announces a proposed substantial amendment to the 2021 Action Plan for the purpose of including allocation amounts, estimated goals information and additional changes pertaining to the State's federal Housing Trust Fund (HTF) Program. This information will be available to the public electronically by Monday, May 3, 2021 and will also be available on request in limited hard copies by mail.

The proposed changes will be available on IHDA's website at www.ihda.org. Electronic copies of the proposed changes will also be available through the State Library network, as well as other local libraries located throughout the State.

The State will be holding one public hearing on Wednesday, May 26, 2021 at 10:30 A.M. It will be presented via Webex virtual conferencing. No in-person attendance will take place on May 26, 2021.

The day of the hearing, access the hearing information by following the link:

<https://illinois2.webex.com/illinois2/j.php?MTID=mc3cfafef4db2f94b5a4ae6ca25bd5ed7>

This link will also be posted on the IHDA website. The Meeting ID is: 133 156 8117; the meeting password is 4qnGfX3vY7s

Persons are welcome to provide public comments prior to, at, or after the public hearing. Written comments are also welcomed by email to bhughes@ihda.org or mailed directly to IHDA to ensure your comments receive a written response. 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 four (4) 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) 836-5383 or TDD/TTY (312) 836-5222.

The State's public comments period begins on May 3, 2021, and all written public comments must be received at IHDA by close of business on Tuesday, June 1 2021. The State anticipates submitting the final Five-Year Plan and Action Plan to HUD by Friday, June 4, 2021.

For further information, contact:

Illinois Housing Development Authority

Strategic Planning and Reporting/Compliance and Reporting (SPAR/RC)

Attention: Consolidated Plan

111 E. Wacker Drive, Suite 1000

Chicago, Illinois 60611

312/836-5364

Dated: April 26, 2021

Community Development Block Grant Program

NOTICE OF PUBLIC COMMENT PERIOD

Substantial Amendment to the 2021 Action Plan-Consolidated Plan

On May 20, 2021, the U.S. Department of Housing and Urban Development notified the Illinois Department of Commerce and Economic Opportunity that the previously announced Community Development Block Grant allocation for 2021 was incorrect. The State of Illinois' allocation has increased to \$31,038,073 from \$30,587,443. The increase of \$450,630 has been added to Disaster Response funding, as funding for this program had been decreased over 2020. Edits to reflect this change have been made in the Illinois Action Plan areas of: AP15, AP20, AP30.

In accordance with 24 CFR 5.110 HUD has determined good cause within statutory limitations to waive regulatory provisions. Per a memorandum from James Arthur Jenison II, Principal Deputy Assistant Secretary of HUD, the Citizen Participation Public Comment Period for the aforementioned change in the Action Plan has been reduced to three days. The public comment period for the change in 2021 allocation begins Tuesday, May 25, 2021 and ends Thursday, May 27, 2021. Comments may be addressed to the Illinois Department of Commerce and Economic Opportunity through e-mail at ceo.oed@illinois.gov You also have the opportunity to address this action at a Public Hearing to be held on Wednesday, May 26, 2021 at 10:30 am. The Hearing will be held virtually and can be accessed at the following

link: <https://illinois2.webex.com/illinois2/j.php?MTID=mc3cfafef4db2f94b5a4ae6ca25bd5ed7> The Meeting ID is: 133 156 8117; the meeting password is 4qnGfX3vY7s.

Agenda

- Welcome and Introductions/Overview of Agenda – Reporting and Compliance, Strategic Planning and Reporting (RC-SPAR) Illinois Housing Development Authority (IHDA)
- Historical Overview of the State Consolidated Plan; Citizen Participation Process; State Priorities – The Comprehensive Housing Plan Act (P.A. 94-965) and the Annual Comprehensive Housing Plan _IHDA
- State's Amendment to the Draft 2021 Action Plan for the federal Housing Trust Fund (HTF) - IHDA

- Public Comments/Testimony/Question and Answer Period on the federal Housing Trust Fund and comments relating to Other HUD Formula Funding Programs:
 - Community Development Block Grant (CDBG) and the Non-Housing Community Development Plan - Illinois Department of Commerce and Economic Opportunity (DCEO)
 - DCEO received notice from HUD on May 20th that the CDBG allocation had increased to \$31,038,073 from \$30,587,443 as previously notified on 3/24/21. The increase of \$450,630 was added to Disaster Response funding. Edits to reflect this change have been made in the Action Plan areas of: AP15, AP20, AP30.
 - HOME Investment Partnerships Program – 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
- Adjournment

Public Hearing Comments and Corresponding State Response

Public Hearing Call-In

For the State of Illinois

State of Illinois Consolidated Plan-Draft 2021 Action Plan

Wednesday, May 26, 2021 @ 10:30 A.M.

Notes of Public Hearing Call-in

At the time of the meeting, a full roster of State Formula Grant Program administrative staff representing the Illinois Department of Commerce and Economic Opportunity (CDBG); the Illinois Housing Development Authority (HOME and the federal Housing Trust Fund [HTF]); the Illinois Department of Human Services (ESG); and the Illinois Department of Public Health (HOPWA) was available to present and/or discuss the 2021 draft Action Plan. Additional callers joined as the hearing progressed, but no running roll-call was taken.

Mr. Burton Hughes began the hearing, welcoming attendees, requesting that call-ins to the hearing mute their phones during the staff presentations. He remarked on the continuing in person meeting restrictions in the State under the pandemic, and then guided attendees to exactly where on the IHDA website they could locate both the agenda for today's hearing, and the specific documents detailing the proposed changes to the draft 2021 Action Plan. Information regarding CDBG is also available on the DCEO website. He then gave a short history of the State's role in developing both the HUD-required Consolidated Plan and the State-required Annual Comprehensive Housing Plan (ACHP). The Consolidated Plan and Annual Action Plans serve as the application for funding under five federal programs, namely the Community Development Block Grant Program (CDBG), the HOME Program, the federal Housing Trust Fund Program (HTF), the Emergency Solutions Grants Program, and the Housing Opportunities for Persons with AIDS (HOPWA) Program.

Mr. Hughes then explained that the current 30-day public comments period, which began Friday, May 3, 2021, and runs until June 1, is the second public hearing the State has held for the 2021 Action Plan and today's hearing is the second public hearing for that same plan. This second Public Comment period and Public Hearing serve two distinct purposes. Firstly, while HUD issued the actual allocation amounts for the CDBG, HOME, ESG and HOPWA programs on February 25th, the actual allocations for the HTF program were not released until April 6th – already well into the public comments process for the other four programs, and could not be included as part of the prior 30-day public comments period. It was necessary that the State hold a second Public Hearing to receive public input regarding the HTF program, as well as receive any additional input from the public regarding the proposed activities for 2021 funding under the other four formula grant programs.

Secondly, on May 20, 2021, the U.S. Department of Housing and Urban Development notified the State of Illinois, as well as other states across the nation, that the previously announced Community Development Block Grant (CDBG) allocation for 2021 was incorrect. The State of Illinois' allocation had increased to \$31,038,073 from \$30,587,443. This change in the funding amount equated to a substantial amendment to the Consolidated Plan, requiring an additional Public Comments period and Public Hearing for the CDBG program. The Illinois Department of Commerce and Economic Opportunity has determined the increase of \$450,630 will be added to Disaster Response funding, as funding for this program has been decreased over the 2020 CDBG funding amount. Edits to reflect this change have been made in the proposed State of Illinois 2021 Action Plan.

Also, in accordance with 24 CFR 5.110, HUD determined good cause within statutory limitations to waive regulatory provisions regarding the public comment period. Per a memorandum from James Arthur Jenison II, Principal Deputy Assistant Secretary of HUD, the Citizen Participation Public Comment Period for the aforementioned change in the 2021 Action Plan has been reduced to three days. The public comment period for the change in CDBG 2021 allocation thus began Tuesday, May 25, 2021, and ends tomorrow, Thursday, May 27, 2021. Notice and Information on the change to the Consolidated Plan, and the CDBG waiver for the public comments period was posted on both the IHDA and the DCEO websites, and email notification sent via contact lists to agencies and individuals across the State. Comments may be addressed to the Illinois Department of Commerce and Economic Opportunity through e-mail at ceo.ocd@illinois.gov. Agencies and individuals also have the opportunity to address this action at this very Public Hearing, held today, Wednesday, May 26, 2021.

Presentations focusing on the federal Housing Trust Fund and Community Development Block Grant programs, to be following by open discussion on those and the other three Formula Grant programs, as well as discussion/comments on any other parts or aspects of the 2021 Action Plan followed:

Mr. Hughes then briefed attendees on 2021 proposed actions and funding for the federal HTF program. The HTF allocation is funded by proceeds from the Government Sponsored Entities (GSEs) Fannie Mae and Freddie Mac and released to HUD by the Treasury, rather than determination by federal allocation, therefore, the actual allocations for the HTF program were not released by HUD until April 6th, thus requiring the second 30-day Public Comment period, and today's hearing. The State's HTF allocation of \$30,702,615 for 2021 is a significant increase compared to last year's \$12,424,008 allocation. Ten percent of the 2021 allocation (\$3,070,261) will be used for program administration. IHDA expects to fund approximately 78 units of multifamily affordable rental housing for households earning 30% of Area Median Income (AMI) or less with HTF funds, divided between both new construction and rehabilitation housing units. While the State estimates it will provide 46 units of new construction and 32 units or rehab, actual numbers will be based upon the applications received and the type of projects funded. As in previous years, HTF funds will be distributed in conjunction with IHDA's Permanent Supportive Housing - Request for Applications (PSH-RFA). Mr. Hughes then reviewed the various sections of the Action Plan where specific updates and changes have been made relating to the HTF program as well as the PSH-RFA. These changes included a new maximum grant limit of \$8,500,000 per proposed project, and the requirement that any proposed project's cost not exceed 90% of the total project cost, with the remaining 10% leveraged by non-IHDA funding, among the other points of interest covered.

Ms. Wendy Bell of DCEO then reviewed changes related to the increased CDBG funding amount for 2021. The State of Illinois' CDBG allocation had increased to \$31,038,073 from \$30,587,443. This change in the funding allocation initiated changes to the Consolidated Plan requiring an additional Public Comments period and Public Hearing for the CDBG program. As mentioned above, HUD also waived the 30-day Public Comments period in favor of a 3-day Public Comments period. The Illinois Department of Commerce and Economic Opportunity has determined the increase of \$450,630 will be added to Disaster Response funding, as funding for this program has been decreased over the 2020 CDBG funding amount. Edits to reflect this change have been made in the proposed State of Illinois 2021 Action Plan areas of AP-15, AP-20, and AP-35.

Once the presentations for HTF and CDBG were completed, Mr. Hughes then very briefly referenced the other programs, and sections of the plan not affected by the changes, such as ESG, HOPWA and the Other Actions (AP-85) section of the Consolidated Plan, and opened the hearing for questions and discussion on HTF, CDBG, the other three Formula Grant programs, and aspects of the Action Plan in general.

At this point in the meeting, those call-ins that were not members of staff of the various Formula Grant administrations agencies left the call without making comments or posing questions. The meeting then adjourned.

STATE OF ILLINOIS PUBLIC NOTICE
Public Hearing on the
Draft State of Illinois 2021 Annual Action Plan-Consolidated 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), the Illinois Department of Public Health (IDPH), and other State agencies, announces the availability of the draft 2021 Action Plan. This draft document will be available to the public electronically by Friday, March 19, 2021 and will also be available on request in limited hard copies by mail.

IHDA was designated on June 16, 1994 as the lead State entity for developing the Consolidated Plan and related documents. 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 funding for the following formula grant programs: Community Development Block Grant (CDBG); HOME Investment Partnerships; Emergency Solutions Grant (ESG); and Housing Opportunities for Persons with AIDS (HOPWA); and the (federal) Housing Trust Fund (HTF). An electronic version will be available on IHDA's website, 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 one public hearing on Wednesday, April 14, 2021 at 10:30 A.M. It will be presented via WebEx virtual conferencing. No in-person attendance will take place on April 14, 2021.

The day of the hearing, access the hearing information by following the link:

<https://illinois2.webex.com/illinois2/j.php?MTID=m756ed5ab5a25b483a247e8bf38829eb2>

This link will also be posted on the IHDA website. The Meeting ID is: 133 331 8534 ; the meeting code is 554P39vpVeV

Persons are welcome to provide public comments prior to, at, or after the public hearing. Written comments are also welcomed by email to bhughes@ihda.org or mailed directly to IHDA to ensure your comments receive a written response. 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 four (4) 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) 836-5383 or TDD/TTY (312) 836-5222.

The State's public comments period begins on March 19, 2021, and all written public comments must be received at IHDA by close of business on Monday, April 19, 2021. The State anticipates submitting the final Five-Year Plan and Action Plan to HUD by Friday, April 23, 2021.

For further information, contact:

Illinois Housing Development Authority
Strategic Planning and Reporting/Compliance and Reporting (SPAR/RC)
Attention: Consolidated Plan
111 E. Wacker Drive, Suite 1000
Chicago, Illinois 60611
312/836-5364

Dated: March 12, 2021

**Public Hearing Call in and Agenda
For the State of Illinois
State of Illinois Consolidated Plan-Draft 2021 Action Plan**

Wednesday, April 14, 2021 @ 10:30 A.M.

Public Hearing Call-in/Log-in

The day of the hearing, access the hearing information by following the link:

<https://illinois2.webex.com/illinois2/j.php?MTID=m756ed5ab5a25b483a247e8bf38829eb2>

This link will also be posted on the IHDA website.

The Meeting ID is: 133 331 8534 ; the meeting code is 554P39vpVeV

Audio Information

When joining the meeting, you will be prompted to select how to connect to the audio call. Callers can have the meeting call them back, in which case, callers will enter their phone number and the meeting will call them directly. This is recommended.

Callers can also choose the option to call into the meeting. The meeting will then give them the phone number to call and access code to enter.

There is a global call in number of 1-415-655-0003. The access code for this number is the same as the meeting ID This is not a toll-free number.

Agenda

- Welcome and Introductions/Overview of Agenda – Reporting and Compliance, Strategic Planning and Reporting (RC-SPAR) 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 2021 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 from the
SPAR/Compliance and Reporting Advisory Committee
Meeting**

**Held via Teleconference Call
(312) 535-8110 or (240) 454-0879
Access Code 286-174-657#**

Tuesday, April 13, 2021 @ 10:30 a.m.

Attending:

John Burch	CMAP
Helen Crum	SE Clark and Associates
Ben Fenton	Illinois Housing Development Authority
Burton Hughes	Illinois Housing Development Authority
Deirdre Kenny	Illinois Housing Development Authority
Jennifer Koechle	Illinois Department of Public Health
Jeffrey Maras	Illinois Department of Public Health
Daisy Marchan	Illinois Housing Development Authority
Tricia Patterson	Illinois Department of Public Health
Bob Palmer	HAI
Alan Quick	Illinois Housing Development Authority
Gracie Reilly	
Traci Sanders	Illinois Housing Development Authority
Josalyn Smith	Illinois Department of Human Services
Bryan Walsh	Illinois Department of Public Health

There were two (2) additional unidentified call-ins

Welcome/Introductions

Mr. Burton Hughes, of IHDA's Strategic Planning and Reporting/Reporting and Compliance (SPAR/RC) opened the meeting, welcoming attendees, followed by an informal roll-call of those in attendance.

State Consolidated Plan and State Comprehensive Housing Plan Updates

Mr. Hughes began with an update on Consolidated Plan activities since the last meeting of the OHCS Advisory Committee, which occurred on September 23, 2020. In the interim, the final 2020-2024 Five Year Consolidated Plan has been approved by HUD, and is available on the IHDA website at www.ihda.org. Due

to a subsequent re-formulation by HUD, both the 2020 CDBG and 2020 HOME Grant Agreements were not fully executed until March 26, 2021.

Due to a major delay in the federal appropriations process, HUD's publication of the 2021 Formula Grant allocations for the Community Development Block Grant (CDBG), HOME, Emergency Solutions Grants (ESG) and Housing Opportunities for Persons with AIDS (HOPWA) programs did not happen until February 25, 2021. Publication of federal Housing Trust Fund (HTF) allocations only occurred April 6, 2021.

HUD extended the deadline for submittal of the 2020 Annual Performance Report until June 30, 2021, due in part to the delay in executing CDBG and HOME grant agreements. At this point, the formula grant administrators would usually include information on the number and type of households the CDBG, HOME, HTF, ESG and HOPWA programs assisted over the past year, but with the delay in signing Grant Agreements and the release of funds, that information is not yet available.

The State is scheduled to submit the 2021 Action Plan for funding under four of the five federal Formula Grant programs on Friday, April 23. The Plan would usually be submitted in November before the start of the calendar year, but since 2014, formula grant grantees can no longer submit their annual Action Plans to HUD without publishing the exact formula grant allocations for each program. Due to this, the submission of the 2021 Action Plan was delayed until after the President signed the 2021 budget, and HUD subsequently released the actual allocation amounts for four of the five Community Planning and Development (CPD) programs on February 25, 2021. Information on the 2021 HTF allocation, per guidance from HUD, will be shared with the public as a substantial amendment to the 2021 Action Plan that is to be submitted to HUD on April 23, 2021.

The mandatory 30-day Public Comments period for the 2021 Action Plan began on March 19. The State will be holding one public hearing, tomorrow, on Wednesday, April 14, 2021 at 10:30 A.M. It will be presented via WebEx virtual conferencing. No in-person attendance will take place on April 14, 2021. The day of the hearing, please access the hearing by following the link:

<https://illinois2.webex.com/illinois2/j.php?MTID=m756ed5ab5a25b483a247e8bf38829eb2>

This link has also been posted on the IHDA website. The Meeting ID is: 133 331 8534 ; the meeting code is 554P39vpVeV. Written comments should be emailed to IHDA at bhughes@ihda.org or submitted during the public hearing. For comments relating to CDBG, ESG or HOPWA, emails should be Cc'ed to the specific formula grant agency as well. The 30-day public comments period for the 2021 Action Plan began March 19, 2021 and runs until Monday, April 19, 2021.

When HUD issued the actual allocation amount for the CDBG, HOME, ESG and HOPWA programs in February (25th) of this year, the actual allocations for the HTF program had not yet been published. The amount of HTF funds made available through the Treasury is based upon a percentage of the GSE's profits, as opposed to congressional appropriation. The HTF state allocation amounts were only published by HUD on April 6, well into the public comments process for the 2021 Action Plan, and could not be included as part of the current 30-day Public Comment period. The public comments period for the HTF Substantial Amendment to the 2021 Annual Action is currently being finalized.

Both the IDHS Emergency Solutions Grants and the DCEO Community Development Block Grant program staff are working on additional amendments to the 2019 Consolidated Plan to use funds received from HUD to address the pandemic under the CARES Act. IDHS is using waivers made available for the 2019 Action Plan, which covers the first and second rounds of CARES Act funding. ESG grantees were able to

forego a public comments period in lieu of a public notification of how it will use CARES Act funding under the 2019 Action Plan. IDHS is currently submitting its plan for the 2nd Round of CARES Act funding to HUD for review and approval. DHS will discuss its program later in the meeting.

Mr. Ben Fenton then updated attendees on Annual Comprehensive Housing Plan (ACHP) activities. The 2021 Annual Comprehensive Housing Plan (ACHP) was successfully submitted to the Governor and Illinois General Assembly on January 15th. The ACHP was also made available on IHDA's website. A brief summary of the 2021 plan was provided, including a overview of the four focus areas in this year's plan. This year's ACHP includes several new focus areas which were greatly impacted by the Covid-19 crisis and the need to reaffirm statewide policies that address long standing racial and ethnic inequities in housing. Attendees were encouraged to review document, including the funding estimates and deliverables contained in the statewide housing production charts located in the back of the report.

Mr. Fenton also informed the group that IHDA had most recently submitted the ACHP's 2020 Annual Progress Report to the Governor and Illinois General Assembly on April 1st. He noted that several programs were impacted by the pandemic in CY2020 and that staff at IHDA worked to incorporate mid-year adjustments in funding, deliverables, and programming to make the report as accurately reflective of the year as possible. Of note were the Emergency Rental and Mortgage assistance programs administered by IHDA – which were highlighted in the summary program chart on page 3 of the report – and created mid-year and meant to assist those experiencing economic hardships due to Covid-19.

Formula Grant Updates

Mr. Hughes of the Illinois Housing Development Authority provided an update on HOME Program activities. Under the 2021 Action Plan, the HOME Program will restrict funding to Multi-family Development new construction and rehab. The State allocation will be augmented with program income. For 2021, the HUD HOME allocation is \$16,742,680, ten percent of which will be used for program administrative costs. IHDA applied for and will actually be able to use up to 20% of the 2019 and 2020 HOME allocations for administration of the HOME program. Estimated 2021 funding of HOME units is expected to result in approximate 81 HOME units, with 48 units of new construction, and 33 units of rehab, depending upon approved applications. Under the federal Housing Trust Fund (HTF), the 2021 State of Illinois allocation is \$30,702,615, ten percent of which will be used for program administrative cost. This year's HTF allocation is more than doubled over last year's funding (2020 HTF totaled to 33 units constructed or rehabbed for Extremely low-income households, with a projected 20 units of new construction, and 13 units of rehab units). The HTF allocation is funded by proceeds from the Government Sponsored Entities (GSEs) Fannie Mae and Freddie Mac.

Ms. Josalyn Smith of the Illinois Department of Human Services (IDHS) gave an update on ESG funding. She stated that IDHS had applied for the second round of CARES Act funding in the amount of \$24,712,992. The Department has spent approximately \$4 million of the \$18.1 million in Round 1 CARES Act funding. IDHS plans on using Round 2 CARES Act funding for the following: \$8.6 million for Emergency Shelter; \$6.3 million for Homeless Prevention; \$5.5 million for Rapid Rehousing, \$1 million for Street Outreach; \$687,000 for HMIS and approximately \$2.4 million for administration. They will receive \$5,282,194 in ESG funding for 2021 and of this 7.5% will be used for administration, 60% for outreach and the remainder for Rapid Rehousing.

Mr. Jeffrey Maras, of the Illinois Department of Public Health (IDPH) gave an update on HOPWA funding. IDPH received CARES Act funding in the amount of \$284,344, and expects to receive any outstanding

invoices within the next 60 days. The HHS Ryan White Program is the Department's primary resource for special needs housing, with funds devoted to short term rent and mortgage, travel expenses for medical visits, hotel/motel accommodation for homeless (following COVID diagnosis). All 2020 HOPWA funds will be expended by June 2021. In the expenditure of IDPH's 2020 funds, 90% has gone towards Tenant-Based-Rental-Assistance, 5% for Mortgage Assistance and 5% for Permanent Placement Housing. Mr. Maras noted that once short term rent and utilities, as funded by Ryan White Part B, are expended, the Department will begin commitment and expenditure of the 2021 Illinois Ryan White award. Mr. Maras also introduced the new HIV/AIDS Housing Coordinator, Ms. Tricia Patterson.

Illinois Department of Commerce and Economic Opportunity staff was unavailable to give an update for the CDBG program.

Additional Updates

- The ERA and EMA Programs administered by IHDA in 2020 are closed
- The Centers for Disease Control and Prevention's temporary national moratorium on most evictions for nonpayment of rent due to COVID 19 is scheduled to end on June 30, 2021
- Governor Pritzker's current Illinois Eviction Moratorium under the COVID-19 Executive Orders runs only through May 1, 2021, This has protected tenants who submit a signed Tenant Declaration Form to their landlord from being evicted or removed from their residence The Tenant Declaration Form is available on the IHDA website. Tenants in need should complete the Tenant Declaration form and provide it to their landlords as soon as possible, if they have not already done so.
- IHDA is currently developing the 2021 Illinois Rental Payment Program to provide further assistance to renters during the pandemic, but is not currently accepting applications, with an anticipated launch date of later this Spring. Applicants will be eligible for up to 15 months of assistance. The grant can cover the past due rent from the previous 12 months, and future rental assistance for the next three months, if deemed necessary. The maximum grant amount is \$25,000, The program is free to the tenant and to the housing provider. If approved, the grant will be paid to the housing provider in the form of a check. Notification will go out immediately once the program is finalized, including a press release and updates on the IHDA website. Go to the IHDA website at ihda.org for further updates, and detailed Eligibility Requirements.

No attendees/call-ins responded when asked for further updates relating to individual agencies/upcoming activities, and began exiting the call, leaving only program administrators on the call.

The meeting adjourned at 11:30.

Public Comments Letters and Corresponding State Response

Public Hearing Call in and Agenda

For the State of Illinois

State of Illinois Consolidated Plan-Draft 2021 Action Plan

Wednesday, April 14, 2021 @ 10:30 A.M.

Notes of Public Hearing Call-in

At the time of the meeting, a full roster of State Formula Grant Program administrator staff representing the Illinois Department of Commerce and Economic Opportunity (CDBG); the Illinois Housing Development Authority (HOME and federal Housing Trust Fund [HTF]); the Illinois Department of Human Services (ESG); and the Illinois Department of Public Health (HOPWA) was available to present and discuss the 2021 draft Action Plan.

No call-ins/public comments were received during the Public Hearing for the Draft 2021 Consolidated Plan-Annual Action Plan