# **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 (C&R) 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.

#### 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

#### **Changes to Action Plan**

#### **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

Annual Action Plan

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.

### 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.

On October 22, 2021, HUD's Office of Community Planning and Development in Chicago issued both its 2019 and 2020 Program Year End Review Letters to the State of Illinois. The letters are on file with and available through IHDA's Strategic Planning and Reporting's division of Compliance and Reporting. Points of note:

It should be noted that although Program Year 2020 began on January 1st, the State/Department of Commerce and Economic Opportunity did not sign all it's CDBG Grant Agreements with HUD until the 4th quarter of the year. Therefore, the amount of time the State has actually had PY 2020 funds available to allocate prior to the time of this report was severely shortened. Since that time, the Department of Commerce and Economic Opportunity has notified all grantees selected in the competitive Public Infrastructure and Housing Rehabilitation applicants have been recommended for funding.

Additionally, the Department of Commerce and Economic Opportunity collects outcomes at grant closeout to ensure accuracy. As grants cover two years, outcomes collected for program year funds 2019 and later are not complete, and would not accurately reflect program activity.

Annual Action Plan

#### CDBG Evaluation of Past Performance 2020

#### <u>CDBG</u>

HUD requests that DCEO provide an explanation on the following:

- Program Performance and Overall Evaluation:
- o Timeliness
- o Compliance with the Primary Objective (70% low-moderate income benefit)
- CAPER Narratives
- Online Performance Reports
- o PR03 Activity Summary Report
- o PR52 CDBG Exception Report

#### Part II: Program Performance and Overall Evaluation – CPD Program

#### Performance and Evaluation Report (PER)

#### Timeliness

Form 40108 covering program year 2020 was submitted to HUD on October 7, 2021.

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

The State of Illinois utilizes a multi-year certification. The current time period is 2020-2022, therefore compliance with the primary objective cannot be measured at this time.

#### **CAPER Narratives**

The following information was included in CR-05, the first response box titled "**Progress the state has** made in carrying out its strategic plan and its action plan. 91.520(a)":

It should be noted that although Program Year 2020 began on January 1st, the State did not sign all it's Grant Agreements with HUD until the 4th quarter of the year. Therefore, the amount of time the State has actually had PY 2020 funds available to allocate prior to the time of this report was severely shortened. Since that time, the Department of Commerce and Economic Opportunity has notified all grantees selected in the competitive Public Infrastructure and Housing Rehabilitation applicants have been recommended for funding. The numbers input in the Table 1 reflect the recommended awards.

Additionally, the Department of Commerce and Economic Opportunity collects outcomes at grant closeout to ensure accuracy. As grants cover two years, outcomes collected for program year funds 2019 and later are not complete, and would not accurately reflect program activity. Therefore, the state is utilizing data from PR-51 for the outcomes in Table 2.

It appears that the information above would be better suited to the last response box of CR-05. As IDIS is currently experiencing issues that prevent edits, the State will make the change when IDIS is available.

#### **On-Line Performance Reports**

#### • PR03 CDBG Activity Summary Report and PR52 Exceptions Reports

All activities identified in Appendix B have been reviewed and appropriate steps taken in IDIS. One activity identified, IDIS Activity #2, CDBG Committed Funds Adjustment, remains open. The system would not allow changes and after reaching out to our CPD Representative who subsequently reached out to HUD's IDIS expert, we received the following guidance:

"No, the grantee cannot and should not close activity #2. Activity #2 is essentially the repository for CDBG funds adjustments. For example, when a grantee returns funds to its line of credit due to ineligible uses of CDBG grant funds for CDBG activities, those returned funds show up in Activity #2 as a negative draw (collection), and the grantee then transfers those funds to the original activity to repay that activity for the ineligible expenses. Also, when a grantee misses its Section 108 scheduled loan repayment, HUD deducts the repayment from its line of credit and posts it as a draw voucher (Manual Payment) under Activity #2.

The state just needs to make sure that it revises all the outstanding collection vouchers and manual payments to the actual activities. They do not need to close activity #2."

HTF and HOME Evaluation of Past Performance 2019 Pt 1

#### Part I: Summary of Planning and Reporting Documents

#### 2015-2019 Consolidated Plan and National Housing Trust Fund Program, Obligations and Expenditures

The State's estimated goals for the HTF program are based on the assumption prior to receiving actual applications, 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. Also, Illinois HTF funds are distributed as a component of the State's Permanent Supportive Housing Development Program. Funding for both FY 2018 and FY 2019 HTF funding were combined and issued under one PSH-RFA, namely IHDA's Permanent Supportive Housing (PSH) Round VI RFA. The deadline for applications under the PSH-RFA Round VI was October 18, 2019, causing a further delay in the commitment of some pre-2020 HTF funding.

HTF funding committed in IDIS using 2015-2019 allocations include Pearl Street Apartments (2016 Action Plan), Pinewood Place and Prairie Trails (2019 Action Plan) and Ogden Apartments, Madison, and Mustacchi Manor (2020 Action Plan). Together, these projects (including Pearl Street) will result in 121 HTF Units (44 Rehab, 77 New Construction). IDIS indicates \$8,831,007 in 2018 HTF funding has been committed, representing 90% of the 2018 allocated amount of \$9,812,230. 58.2%, or \$5,141,837 in 2018 HTF funds have been disbursed as of November 5, 2021.

#### 2019 Annual Action Plan

#### HTF and HOME Evaluation of Past Performance 2019 Pt 2

#### Part II: Management of Funds

HOME Investment Partnerships Program

HOME open Activities Report

#### HTF and HOME Evaluation of Past Performance 2020 Pt 1

#### Planning and Reporting HOME and HTF

In accordance with HUD's Year-End Letter, the State will continue to provide an updated narrative on its progress in meeting all its HOME goals in the next 2021 State of Illinois PER. The State's estimated goals for both the HOME and HTF programs are based on the assumption prior to receiving actual applications, that there will be a ratio of 60 percent to 40 percent of annual funding between new construction and rehab. The final ratio, dependent upon actual applications and the approval of qualified applications, could bias the ratio toward either new construction or rehab for any particular year. This is taken into consideration, with the State striving to meet or exceed the combined number of

New Construction and Rehab units placed in service in any given year, and over the life of the five-year Consolidated Plan.

In 2020, the ratio of new construction/to rehab HOME units was 48/65. HOME board-approved projects for rehab included Hebron Township Apartments, Freedom Path, Lofts on the Square, and Barwell Manor, for a total of 65 rehabbed rental units. This compares to a total of 48 new construction units funded under 2020 HOME (Union Avenue Apartments, East Bluff Housing, Lincoln Loft, and Fifth Avenue Apartments).

Similar to HOME, actual HTF numbers are determined by the type of applications received and the quality of the applications approved. HTF funding committed in IDIS using 2015-2019 allocations include Pearl Street Apartments (2016 Action Plan), Pinewood Place and Prairie Trails (2019 Action Plan) and Ogden Apartments, Madison, and Mustacchi Manor (2020 Action Plan). Together, these projects (including Pearl Street) will result in 121 HTF Units (44 Rehab, 77 New Construction).

#### Part I: Program Performance and Overall Evaluation

HOME Investment Partnership Program

1. Program Commitments and Expenditures

The Authority currently has ten projects totaling approximately \$23.3 million that have been Board Approved and waiting for closing so the Authority can commit HOME funds. These projects are scheduled to close in the coming months. This will facilitate the commitment and expenditure of the remaining 2019 allocation, the 2020 allocation, and a portion of the 2021 allocation. The Authority also has projects in the pipeline for upcoming Board Approved.

The Authority has disbursed all of the 2016 HOME funds and is currently disbursing 2017 funds. The Authority will begin expending additional funds once funding is committed to all the Board Approved projects.

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## HTF and HOME Evaluation of Past Performance 2020 Pt 2

### HTF Housing Trust Fund Program

Program Commitments and Expenditures as of November 5, 2021:

For Program Year 2016 HTF funds, the State had committed and disbursed 100% of its funds

For Program Year 2017 HTF, the State had committed 100% of its funds and disbursed \$7,020,751 (98.01%) in funds.

For Program Year 2018 HTF, the State had committed 100% of its funds and disbursed

\$5,141,837 (58.2%) in funds.

For Program Year 2019 HTF, the State had committed 100% of its funds

For Program Year 2020 HTF, the State had committed 20% of its funds

#### ESG Evaluation of Past Performance 2019 PT 1

ESG

Part I: Summary of Planning and Reporting Documents

#### 2015 to 2019 Consolidated Plan

Program Year-End Review Letter states, "The State of Illinois' 2019 Program Year is the fifth year of its 2015-2019 Consolidated Plan. The State provided narrative information relating its five-year accomplishments, and 2019 activities to goals and objectives set forth in the 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 as to why progress was not made toward the following goals."

ESG has updated IDIS CR-05 Screen Narrative with detailed explanation on the status of each of the goal, barriers, and efforts to meet these goals in the past five years with the following statement.

ESG Goal Prevent Homeless, ESG met 46.28% of the reported goal. The State of Illinois ESG Program only funded Homeless Prevention within the first two years of the five-year plan. Funds were allocated towards Rapid Rehousing to encourage Housing First. The State of Illinois offers homeless prevention through state funds that will supplement the funds being reallocated to another activity.

The report review of the Integrated Disbursement & Integration System (IDIS) Report 06 – Summary of Consolidated Plan Projects for Report Year, showed multiple projects without committed amounts and disbursements. Please provide an explanation for any projects listed below that have uncommitted funds and/or lack disbursements.

#### ESG19 Disbursements

ESG Program Year-End Review Letter states that the State of Illinois has committed the balance of \$4,935,064 but has failed to draw from 2019 ESG funds. The ESG program has been utilizing funds from Grant Fiscal Year (GFY) 18 to ensure those funds are expended by the deadline. All of GFY19 funds have been allocated and will be drawn as providers expend their GFY18 funds.

#### Part II: Program Performance and Overall Evaluation – CPD Programs

#### **Management of Funds**

#### B.) Program Expenditures

Per the Emergency Solutions Grant Interim Regulation at 24 CFR 576.203(b) – "The recipient must draw down and expend funds from each year's grant not less than once during each quarter of the recipient's program year. All of the recipient's grant must be expended for eligible activity costs within 24 months after the date HUD signs the grant agreement with the recipient."

Per the IDIS PR-91 ESG Financial Summary Report, the State of Illinois did not make a draw from the 2019 PY award during the quarters ending in 9/30/2019 and 12/31/19.

However, the report indicated that draws were made in every subsequent quarter. Currently, the State committed all 2019 ESG funds, and disbursed \$1,912,418.70 (38.759%). The expenditure deadline for 2019 ESG funds is July 31, 2021 and the State has \$3,022,645.30 to expend. The State also has \$480,211.51 available to draw from 2018 ESG funds.

#### ESG Evaluation of Past Performance 2019 PT 2

The expenditure deadline for the 2018 funds occurs on October 3, 2020. Failure to meet this deadline could results in these funds being subject to recapture.

ESG expended all of GFY18 funds by the 24-month deadline. ESG did fail to expend all GFY19 funds by the deadline of July 31, 2021. HUD was notified in writing of unexpended balance in the amount of \$92,332.04. The ESG staff contacted each sub-recipient with GFY2019 funds to determine if they were able to expend funding. For the sub-recipients that reported they were unable to expend funds, ESG staff reallocated funds to sub-recipients that were able to utilize them. For sub-recipients that reported they were able to utilize their funds, ESG had them submit an expenditure plan on how they would expend funding. The State of Illinois were assured by all sub-recipients that GFY19 funds would be expended by deadline of July 30, 2021.

After calculating each of the sub-recipient expenditure reports, DHS realized that all of the funds weren't expended. ESG staff contacted the sub-recipients with the remaining balances and the sub-

recipients then reported they weren't able to expend the funds as expected. The sub-recipient with the largest balance in the amount of \$62,935.41, reported they had the clients to assist but was unable to locate landlords willing to work with the families.

#### ESG Evaluation of Past Performance 2019 PT 3

#### ESG Evaluation of Past Performance 2020 PT 1

#### Evaluation of Past Performance continued: ESG

#### Part I: Summary of Planning and Reporting Documents

#### 2020 to 2024 Consolidated Plan and 2020 Annual Action Plan

The State of Illinois' 2020 Program Year (PY) is the first year of its 2020-2024 Consolidated Plan. Narrative information in the PER discusses progress of five-year goals and objectives and specific 2020 activities. The State of Illinois' Annual Action Plans set forth specific projects for funding that were overall consistent with the goals and priorities of the five-year Strategic Plan (Consolidated Plan). The State of Illinois is currently meeting or exceeding goals and objectives in the following categories:

#### **Goal Categories: Homeless**

(See Chart below)

Many of ESG funded agencies had to decrease the number of beds due to COVID-19 and allow for social distancing. Some ESG agencies had to close their doors and utilize hotels/motels as only source of overnight beds. ESG is still on track to meet 100% of the goal for the five-year plan

Goal Identifier	Goal Name	Consolidated Plan	Action Plan
		Percentage Met	Percentage Met
Homeless Person Overnite	Provide Emergency	16.76%	83.81%
Shelter	Shelter to Homeless		
Tenant Baaed Rental	Rapid Re-housing of	27.23%	136.17%
Assistance Rapid Re-Housing	Homeless		

Other	Street Outreach to	20.70%	103.50%
	Homeless		

#### Table 1 - 2020 ESG Goal Category Homeless Chart 1

#### ESG Evaluation of Past Performance 2020 PT 2

Many of ESG funded agencies had to decrease the number of beds due to COVID-19 and allow for social distancing. Some ESG agencies had to close their doors and utilize hotels/motels as only source of overnight beds. ESG is still on track to meet 100% of the goal for the five-year plan

#### Part II: Program Performance and Overall Evaluation

Performance and Evaluation Report (PER)

1. Program Commitments and Expenditures

Grantees are subject to commitment (obligation) and expenditure tests based on the date of funding obligation by means of agreement with HUD. Per the Emergency Solutions Grant Interim Regulation at 24 CFR 576.203(a)(1)(i) – "Within 60 days from the date that HUD signs the grant agreement with the State (or grant amendment for reallocated funds), the recipient must obligate the entire grant, except the amount for its administrative costs." Further, the requirements of 24 CFR 576.203(b)(2): The recipient must draw down and expend funds from each year's grant not less than once during each quarter of the recipient's program year. All the recipient's grant must be expended for eligible activity costs within 24 months after the date HUD signs the grant agreement with the recipient.

Expenditure Test: For the 2020 Program Year, subject to current and interim compliance evaluation, HUD has utilized the IDIS PR-91 ESG Summary Report to determine the following

Expenditure Test	Deadline Date	Percentage	<b>Disbursement Required</b>	Timely / Yes/No
PY 2020	12/29/22	73.231%	\$1,410,832.14	Yes
PY2019	7/31/21	98.13%	\$92.332.04	No

#### Table 2 - ESG Chart 2

#### ESG Evaluation of Past Performance 2020 PT 3

Grantees that have failed or are at risk of meeting obligation and expenditure test requirements may be subject to further corrective actions. Please reference Appendix B for further discussion.

ESG failed to expend all GFY19 funds by the deadline of July 31, 2021. HUD was notified in writing of unexpended balance in the amount of \$92,332.04.

The ESG staff contacted each sub-recipient approximately four months ago with

GFY 2019 funds to determine if they were able to expend funding. The sub-recipients that reported stated they were unable to expend funds, ESG staff reallocated funds to subrecipients that were able to utilize them. The sub-recipients that reported they were able to utilize their funds, ESG had them submit an expenditure plan on how they would expend funding. The State of Illinois were ensured by all sub-recipients that GFY19 funds would be expended by deadline of July 30, 2021.

After calculating each of the sub-recipient expenditure reports, we realized that all of the funds weren't expended. ESG staff contacted the sub-recipients with the remaining balances and the sub-recipients then reported they couldn't expend the funds as expected. The sub-recipient with the largest balance in the amount of \$62,935.41, reported they had the clients to assist but was unable to locate landlords willing to work with the families.

The State of Illinois ESG Program was informed by HUD that the unexpended 2019 funds will be recaptured.

ESG Evaluation of Past Performance 2020 PT 4

**Reporting Issues and Requested Revisions** 

**APPENDIX B: Program Year 2020** 

## **3. CAPER Narratives**

The following required CAPER narrative sections require revision and/or submission as per instruction below:

1. CR-60- ESG Grantees

The State of Illinois did not provide the required information on its ESG subrecipients. Please revise the subrecipient reporting, include this information and resubmit accordingly.

1. CR-65 ESG Persons Assisted

While the State of Illinois provided partial information in the tables 4a, 4b, 4c, and 4d about total persons served, the State missed to provide a breakdown of the persons in households served (adults or children). Furthermore, the grantee did not attach the SAGE Report in IDIS. Please include this information and resubmit accordingly.

#### 1. CR-70 ESG Assistance Provided and Outcomes

Shelter Utilization: The State of Illinois did not provide information on total beds available and provided in IDIS. The grantee provided a short explanation stating that providers had difficulties entering data in SAGE. However, HUD does not deem this explanation acceptable. The subrecipients have experience inputting information in SAGE. HUD is expecting for the State to review and provide this information. Please include this information and resubmit accordingly.

ESG collected partial data within the missing categories. Some agencies experienced difficulty submitting the needed data due to high turnover rates and lack of staffing due to COVID. ESG staff will collect any missing data from funded agencies and resubmit the data within IDIS.

# **5. Monitoring**

The grantee has outstanding monitoring Findings as follows:

The State of Illinois ESG grant was monitored in 2021 and there are currently seven (7) outstanding Findings. Per the Monitoring and Report Letter dated September 24, 2021, the State has 45 days from the date of the letter to respond with information addressing the findings. If there are questions related to pending corrective actions, please consult your CPD Representative. ESG submitted a corrective action plan to HUD resolving the seven (7) outstanding findings and will continue to work with HUD CPD until findings are closed.

#### **HOPWA**

This serves as a response to the HUD 2019 Program Year-End Review Letter from the Illinois HOPWA Program. Please see below for an update on progress for the listed HOPWA goals.

Goal	Category	Source/ Amount	Indicator	Unit of Measure	Expecte d Strategi c Plan	Actual – Strategi c Plan	Percent Complete	Status	Barriers	Efforts to meet goal
HOPWA Housing Facilities Rehabilitatio n and Repair	Homeless ; Non- Homeless ; Special Needs	HOPWA: \$388,661.12	HIV Homeless Members	Members Served Unit	75	72	96.00 %	Complete d	COVI D 19	Transitionin g to new State Funding Stream
Housing for Persons with HIV/AIDS	Non- Homeless ; Special Needs	HOPWA: \$1,345,973.8 8	HIV/AIDS Housing Operation S	Househol d Housing Unit	300	234	78.00 %	Complete d	COVI D 19	Training with the new launch of TBRA Statewide Services.

Additionally, please see below for updates to HOPWA projects that previously had uncommitted funds or lacked disbursements.

#### PROTECTING HEALTH, IMPROVING LIVES

IDIS Project	Project Title	Program	Project Estimate	Committed Amount	Amount Drawn through Report Year	Amount Available to Draw
16	2019-2020 ILH19 AIDS Foundation of Chicago Collar	HOPWA	\$385,985.78	\$385,985.78	\$385,985.78	\$0.00
17	2019-2020 ILH19 AIDS Foundation of Chicago Cook	HOPWA	\$732,353.09	\$732,353.09	\$732,353.09	\$0.00
18	2019-2020 ILH19 CUPHD	HOPWA	\$86,860.97	\$86,860.97	\$86,860.97	\$0.00
19	2019-2020 IIH19 STRMU Jackson Co. HD	HOPWA	\$4,575.00	\$4,575.00	\$4,575.00	\$0.00
20	2019-2020 ILH19 St. Clair Co. HD	HOPWA	\$22,468.89	\$22,468.89	\$22,468.89	\$0.00
21	2019-2020 ILH19 SIU-School of Med	HOPWA	\$16,284.94	\$16,284.94	\$16,284.94	\$0.00
22	2019-2020 ILH19 UICM- Positive Health Solutions	HOPWA	\$5,927.80	\$5,927.80	\$5,927.80	\$0.00
23	2019-2020 ILH19 Project of the Quad Cities	HOPWA	\$22,013.00	\$22,013.00	\$22,013.00	\$0.00

HOPWA Evaluation of Past Performance 2019 Pt 1

#### DRAFT 2022 Action Plan – State of Illinois

24	2019-2020 IIH19 Alexian Brothers	HOPWA	\$31,727.26	\$31,727.26	\$31,72
25	2019-2020 ILH19 Fifth Street Renaissance	HOPWA	\$15,055.94	\$15,055.94	\$15,05
26	2019-2020 ILH19 Phoenix Center	HOPWA	\$150,000.00	\$150,000.00	\$150,00
27	2019-2020 ILH19 Greater Community AIDS Project	HOPWA	\$0.00	\$0.00	
28	2019-2020 ILH19 Puerto Rican Cultural Ctr.	HOPWA	\$150,000.00	\$150,000.00	\$150,00
29	2019-2020 IIH19f999 DeLaCerda House	HOPWA	\$41,877.92	\$41,877.92	\$41,87
30	2019-2020 ILH19F999 Winnebago Co. HD	HOPWA	\$69,504.41	\$69,504.41	\$69,50

#### HOPWA Evaluation of Past Performance 2019 Pt 2

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

Summary from citizen participation section of plan.

Summary from citizen participation section of plan.

The Citizen Participation Plan centers around the public hearing and public comments processes. Because of the COVID-19 pandemic, and subsequent HUD waivers to prevent the spread of the contagion, The State held one public hearing on Monday, July 11, 2022 at 10:30 A.M. via Web-ex. The Public Comment period began Wednesday June 15, 2022 and ended Wednesday July 13, 2022.

- A 2022 Public Notice was e-mailed statewide to housing-related agencies and organizations, a number of which included announcement of same in a newsletter or mailing sent to their memberships. Copies were also sent to the members of the 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 2022 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, and Affordable Housing Trust Fund Advisory Commission
  members, 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.
- The public hearing was held during the 30-day public comments period via Web-ex. The date for the hearing, Monday Huly 11, 2022, 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
- \_\_\_\_\_ 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 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

#### 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.

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

Not applicable.

#### 7. Summary

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. AC meetings in 2022 were held on Wednesday, March 16, 2022 and Thursday, June 30, 2022. Minutes of these scheduled meetings are available upon request to the Strategic Planning and Reporting

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

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

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

Agency Role		Name		Department/Agency	
CDBG Administrator			Department o	f Commerce and Economic Opportunity	
HOPWA Administrator			Department o	f Public Health	
HOME Administrator	ILLINO	IS	IL Housing Dev	elopment Authority	
ESG Administrator			Department o	f Human Services	
	ILLINO	IS	IL Housing Dev	elopment Authority	

Table 3 – Responsible Agencies

#### Narrative

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.

#### DRAFT 2022 Action Plan – State of Illinois

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.

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

Illinois Department of Commerce and Economic Opportunity (CDBG)

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Alternate: Kara Cozadd

#### Illinois Housing Development Authority (HOME and HTF)

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Alternate: Deirdre Kenny

#### DRAFT 2022 Action Plan – State of Illinois

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

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

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Springfield, IL 62761

Contact (Division of Environmental Health):

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

Tricia Patterson

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

#### 1. Introduction

The State consulted the following major advisory bodies:

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

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

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

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

Continuum of Care agencies are represented on the State's Interagency Council on Homelessness (ICH). The State's ICH 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

Table 4 – Agencies, groups, organizations who participated

1	Agency/Group/Organization	ALLIANCE TO END HOMELESSNESS IN SUBURBANK 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 Continua-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
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 Leaders 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?	

#### 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

work with the Emergency Solutions Grants Program administered by IDHS, employing several similar strategies for ending homelessness in each of their jurisdictions and include	Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Continuum of Care the following: conducting coordinated assessments, developing additional permanent		Regional Continuums	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

		On 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 related
		planning actions. This rule also established a standardized fair housing assessment and
		planning process to give 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), this 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 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.IHDA serves as the coordinating agency for the State Consolidated
		Plan and the next Five-Year Plan, for calendar years 2020-2024. However, on May 23, 2018,
	State and Local	HUD issued three notices which eliminated grantee obligation to analyze patterns of
Fair Housing	Government	segregation and poverty and submit plans to address those patterns to receive HUD funding:
	Government	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 must legally fulfil their
		obligation to affirmatively further fair housing by way of the Analysis of Fair Housing
		impediments (AFHI). Despite this change, the State continued to provide its AFFH
		Consolidated Plan certification in accordance with the requirements that existed prior to
		August 17, 2015. Then, on April 13, 2021, HUD submitted a proposed rule to the Office of
		Information and Regulatory Affairs (OIRA) reinstating the 2013 Disparate Impact Rule and an
		interim final rule restoring statutory definitions to the AFFH rule. With this change, HUD
		funding recipients must again certify compliance with AFFH on an annual basis and IHDA will
		continue to report on the State's actions to address its previously identified fair housing
		impediments in the State's Consolidated Plan Annual Action Plans and Annual Performance
		Reports.The Illinois Department of Human Rights, besides processing fair housing complaints
		as a HUD-designated substantially equivalent agency, conducts presentations and training

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
		for government agencies and community-based groups regarding fair housing rights under
		the Illinois Human Rights Act IDHR and IHDA also share 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
		PoliciesSessions 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

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
		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
Eair Housing 2	State Government	communities (a State law identifying localities with less than 10% affordable housing stock);
Fair Housing 2	State Government	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

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
		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
Fair Housing 2	State Government	holds on-going training for property managers, which includes a fair housing compliance
Fair Housing 3	State Government	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.

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Fair Housing 4	State Government	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-
	State Government	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
		Treasury's Capitol Magnet Fund

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
		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.
Fair Housing 5	Illinois Department of	Proposed Fair Housing Outreach Activities: IDHR will continue its education and outreach
	Human Rights (IDHR)	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

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

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
		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
Fair Housing 7		taken to affirmatively further fair housing and compliance with Section 504 of the
	DCEO (with IDHR)	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
		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
	Dept of Financial and	lending, most attention has focused on federal regulatory actions to better insure non-
Fair Housing 8	Professional	discrimination and community reinvestment.2. The Division of Professional Regulation
	Regulations (with IDHR)	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

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
		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
	Illinois Department of	appropriated action if laws have been violated. All housing-related complaints are tallied and
Fair Housing 9	Insurance (with IDHR)	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
		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
	Illinois Council on	consumers, families, service providers, policy makers and other professionals. The mission of
Fair Housing 10	Developmental	the Council is to help lead change in Illinois so all people with developmental disabilities
	Disabilities (with IDHR)	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

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
		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
		complacence 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
Fair Housing 11	Office of the Attorney	discrimination, the Attorney General has jurisdiction over multi-story housing which is
	General (with IDHR)	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 throughput Illinois concerning their rights under the HRA

Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
	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
Various State Agencies	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 5 - Other local / regional / federal planning efforts

#### Narrative

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

# 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, 202

The Public Comment period began Friday, March 19, 2021 and ended Monday, April 19, 2019. 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.

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

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
2	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	N/A	

Sort Order	Mode of Outreach	Target of Outreach	Summary of	Summary of	Summary of comments	URL (If
			response/attendance	comments received	not accepted	applicable)
					and reasons	
			Generally, response			
		Non-	to newspaper ads will			
3	Newspaper Ad	targeted/broad	result in attendance	N/A	N/A	
5	Newspaper Au	community	at the public hearing,	N/A	N/A	
			or written letter			
			response or email			
				Generally, response		
				to newspaper ads		
		Non-	No public commonts	will result in		
4	Internet Outreach	targeted/broad	No public comments	attendance at the	N/A	
		community	were received	public hearing, or		
				written letter		
				response or email		

Table 6 – 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 received \$70,753,404 in Community Development Block Grant-Coronavirus (CDBG-CV) funds through the CARES Act. These funds have been allocated for Shelter Construction, Business Resiliency, and Healthy Houses as outlined in the 2019 Action Plan Amendment.

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

## **Anticipated Resources**

Program	Source	Uses of Funds	Exp	ected Amount	Available Yea	ar 1	Expected	Narrative Description
	of Funds		Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$	Amount Available Remainder of ConPlan \$	
CDBG	public -	Acquisition						The 2022 allocation for Illinois'
	federal	Admin and						CDBG program is more than \$1.2
		Planning						million less than 2021, primarily as
		Economic						a result of Congressional Earmarks
		Development						being funded through CDBG.
		Housing						
		Public						
		Improvements						
		Public Services	29,798,562	0	0	29,798,562	29,798,562	

Program	Source	Uses of Funds	Exp	pected Amount	Available Yea	ar 1	Expected	Narrative Description
	of Funds		Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$	Amount Available Remainder of ConPlan \$	
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab						IHDA operates by Grant Based Accounting. The deadline for committing program income, repayments and recaptured funds received during a program year is
		Multifamily rental new construction Multifamily rental rehab						the date of the P.J.'s commitment deadline for the subsequent year's grant allocation therefore the program income listed here is 2021 Program Income which has
		New construction for ownership TBRA	18,586,872	16,728,185	0	35,315,057	37,173,744	the same deadline as 2022 Grant Funds

Program	Source	Uses of Funds	Exp	ected Amount	: Available Yea	ar 1	Expected	Narrative Description
	of Funds		Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$	Amount Available Remainder of ConPlan \$	
HOPWA	public -	Permanent						HOPWA funds provide short term
	federal	housing in						mortgage, utility tenant-based
		facilities						assistance, facility based rental
		Permanent						assistance and permanent housing
		housing						placements.
		placement						
		Short term or						
		transitional						
		housing						
		facilities						
		STRMU						
		Supportive						
		services						
		TBRA	2,303,383	0	0	2,303,383	4,000,000	

Program	Source	ce Uses of Funds	Exp	ected Amount	Available Yea	ar 1	Expected	Narrative Description
	of Funds		Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$	Amount Available Remainder of ConPlan \$	
ESG	public - federal	Conversion and rehab for transitional housing Financial Assistance Overnight shelter Rapid re- housing (rental assistance) Rental						ESG funds are used for street outreach, emergency shelter, homeless prevention, rapid rehousing, HMIS, and administration
		Assistance Services Transitional housing	5,436,206	0	0	5,436,206	10,000,000	

Program	Source	Uses of Funds	Exp	ected Amount	: Available Yea	ar 1	Expected	Narrative Description
	of Funds		Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$	Amount Available Remainder of ConPlan \$	
HTF	public -	Acquisition						Provides affordable rental housing
	federal	Admin and						for households at 30% AMI or
		Planning						below
		Homebuyer						
		assistance						
		Multifamily						
		rental new						
		construction						
		Multifamily						
		rental rehab						
		New						
		construction for						
		ownership	33,710,562	0	0	33,710,562	30,000,000	

Table 7 - 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

# 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 2021 Program Income and the FY 2022 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 \$16,728,185 in program income for PY 2022 as of December 31, 2021. Ten percent of program income minus recapture will be made available for administrative. Ten percent of the 2022 HOME allocation will be made available for administrative costs, which is \$1,858,687 for PY 2022.

National Housing Trust Fund State of Illinois Allocation for 2022 is \$33,710,562. Ten percent, or \$3,371,056 will be used for program administration.

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.

# Annual Goals and Objectives

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

## **Goals Summary Information**

Sort	Goal Name	Start	End	Category	Geographic	Needs Addressed	Funding	Goal Outcome Indicator
Order		Year	Year		Area			
1	Multifamily	2020	2024	Affordable	Statewide	Affordable	HOME:	Rental units constructed: 52
	Affordable Housing			Housing	Distribution	Housing	\$18,586,872	Household Housing Unit
								Rental units rehabilitated: 35
								Household Housing Unit
2	Singlefamily Owner	2020	2024	Affordable	Statewide	Affordable	CDBG:	Homeowner Housing
	Occupied Housing			Housing	Distribution	Housing	\$7,000,000	Rehabilitated: 108 Household
	Rehabilitation							Housing Unit
3	Housing Trust Fund	2020	2024	Affordable	Statewide	Affordable	HTF:	Rental units constructed: 51
	Goals			Housing	Distribution	Housing	\$33,710,562	Household Housing Unit
								Rental units rehabilitated: 35
								Household Housing Unit
4	Economic	2020	2024	Non-Housing	Statewide	Community and	CDBG:	Jobs created/retained: 120 Jobs
	Development			Community	Distribution	Economic	\$3,000,000	Businesses assisted: 3
				Development		Development		Businesses Assisted
5	Public	2020	2024	Non-Housing	Statewide	Community and	CDBG:	Public Facility or Infrastructure
	Infrastructure			Community	Distribution	Economic	\$17,500,000	Activities other than
	Activities			Development		Development		Low/Moderate Income Housing
								Benefit: 5833 Persons Assisted
6	Disaster Response	2020	2024	Non-Housing	Statewide	Community and	CDBG:	
	Program			Community	Distribution	Economic	\$1,304,606	
				Development		Development		

Sort	Goal Name	Start	End	Category	Geographic	Needs Addressed	Funding	Goal Outcome Indicator
Order		Year	Year		Area			
7	Prevent	2020	2024	Homeless	Statewide	Homeless		Homelessness Prevention: 0
	Homelessness				Distribution			Persons Assisted
8	Rapid Re-Housing	2020	2024	Homeless	Statewide	Homeless		Tenant-based rental assistance /
	of Homeless				Distribution			Rapid Rehousing: 2000
								Households Assisted
9	Provide Emergency	2020	2024	Homeless	Statewide	Homeless		Homeless Person Overnight
	Shelter to Homeless				Distribution			Shelter: 17500 Persons Assisted
10	Street Outreach to	2020	2024	Homeless		Homeless		Other: 1500 Other
	Homeless							
11	Housing For	2020	2024	Non-Homeless	Statewide	Special Needs	HOPWA:	Tenant-based rental assistance /
	Persons with			Special Needs	Distribution		\$2,303,383	Rapid Rehousing: 200
	HIV/AIDS							Households Assisted
								HIV/AIDS Housing Operations:
								100 Household Housing Unit

Table 8 – Goals Summary

# **Goal Descriptions**

1	Goal Name	Multifamily Affordable Housing
	Goal Description	

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 (\$650,000), 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). Due to increased costs post-pandemic, the maximum award has been increased to \$650,000 and the maximum amount spent per home increased to \$60,000.
3	Goal Name	Housing Trust Fund Goals
	Goal Description	
4	Goal Name	Economic Development
	Goal Description	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. As the COVID-19 pandemic eases, we are seeing increased interest in businesses planning to open or substantially expand. 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.

5	Goal Name	Public Infrastructure Activities
	Goal Description	Although more funding sources have been made available through COVID resources, requests for public infrastructure program funding have consistently outpaced the amount of available funding by as much as 5 to 1. As costs have increased post-pandemic the amounts requested have increased. Additionally, many communities have aging treatment facilities in need of modernization, with costs that far exceed the grant ceiling we have previously provided. Thus, we are increasing the grant ceiling to \$1.5 million in 2022. We realize we will fund fewer projects but the impact will be significant in the communities selected for award.
		Goal is estimated by taking the amount of annual funding divided by the grant ceiling (\$1,500,000) 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.
6	Goal Name	Disaster Response Program
	Goal Description	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. 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. Given that few applications have been received for this program in the last three years, the amount of funding allocated for this program has been reduced.
7	Goal Name	Prevent Homelessness
	Goal Description	ESG will not be funding this program for Fiscal Year 2022. 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.

8	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.
9	Goal Name	Provide Emergency Shelter to Homeless
	Goal Description	The State will provide funding for renovation, operation, and essential services for emergency shelters.
10	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.
11	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 though 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.

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

**Table 9 – 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. Homeownershp 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 beforw 30% AMI across the State.

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.

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 houding in non-entitlement areas of the State.

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

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 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

# 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 10 - Distribution Methods by State Program

1	State Program Name:	CDBG Disaster Response Program
	Funding Sources:	CDBG
	Describe the state program addressed by	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.
	the Method of	
	Distribution.	

Describe all of the	DOCUMENTATION REQUIREMENTS					
criteria that will be used to select applications	Each application <u>must</u> include the UGLG's most recent audit. If unavailable, please contact the Department to determine potential alternative documentation.					
and the relative importance of these criteria.	<ol> <li>All required application forms must be completed with appropriate backup documentation.</li> <li>The Department reserves the right to designate an application "DO NOT FUND", and not complete the rest of its' review for the following reasons: Using self-created forms. Forged, copied, taped, pasted or any alterations to original signatures or dates.</li> <li>The project must qualify for the National Objective of Urgent Need, however, the percentage of Low-to- Moderate income persons in the area must be provided. If the area meets or exceeds 51% LMI, the National Objective of LMI will be utilized in the grant award</li> </ol>					
If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the	Application Guidelines and forms can be found at: https://www2.illinois.gov/dceo/CommunityDevelopment/Pages/default.aspx					
application criteria? (CDBG only)						

	1
Describe the process for awarding funds to state recipients and how the state will make its allocation available	N/A
to units of general local government, and non- profit organizations, including community and faith-based organizations. (ESG only)	
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	Program Category	Budget Ceili	ling De	eadline
will be allocated among	Ongoing (non-competitive Programs			
funding categories.	Economic Development (ED)	\$ 3,000,000 \$	\$1,000,000	NA
	Disaster Response (DR)	\$ 1,304,606 \$	250,000	NA
	Competitive Programs			
	Public Infrastructure (PI)	\$17,500,000 \$1	1,500,000	10/19/2022
	Housing Rehabilitation (HR)	\$ 7,000,000 \$	\$ 650,000	10/19/2022
factors and grant size limits.	\$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.	<ul> <li>The criteria noted below will be used to evaluate all applications requesting funding under the CDBG</li> <li>Economic Development component, as well as determine the appropriate level of financial assistance: <ol> <li>Project Benefit</li> <li>CDBG National Objectives</li> <li>CDBG Dollars</li> </ol> </li> <li>Resource Funding</li> </ul>
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: https://www2.illinois.gov/dceo/CommunityDevelopment/Pages/default.aspx

Describe the process for awarding funds to state recipients and how the state will make its allocation available	N/A
to units of general local government, and non- profit organizations, including community and faith-based organizations. (ESG only)	
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	Program Category	Budget	Ceiling	Deadline	
will be allocated among funding categories.	Ongoing (non-competitive Programs				
runuing categories.	Economic Development (ED)	\$ 3,000,000	) \$1,000,00	00 NA	
	Disaster Response (DR)	\$ 1,304,606	\$ 250,000	NA	
	<u>Competitive Programs</u>				
	Public Infrastructure (PI)	\$17,500,000	\$1,500,000	0 10/19/2022	
	Housing Rehabilitation (HR)	\$ 7,000,000	0 \$ 650,000	0 10/19/2022	
Describe threshold factors and grant size limits.CDBG Economic Development component funds may be used to assist for-profit and not-for- carry out economic development projects. Generally, CDBG grant funds will be provided by local government to the profit or not-for-profit business under a financial assistance agreem upon terms.					
	1. The business may use funds for:				
	Acquisition of land or building;				
	Purchase or installation of fixtu	ures;			
	<ul> <li>Construction, reconstruction, installation or rehabilitation of commercial or industrial buildings, structures and other real property);</li> </ul>				
	Leasehold improvements; and				
	Working capital expenses (inve advertising/marketing expense		ee salaries, gei	neral operating expenses and	
	2. Units of local government may use of economic development	CDBG funds for	public infrastr	ucture improvements in support of	

	What are the outcome measures expected as a result of the method of distribution?	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
3	State Program Name:	CDBG Housing Rehabilitation Program
	Funding Sources:	CDBG
	Describe the state program addressed by the Method of Distribution.	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

The maximum available points per application are 100 points. The maximum scores available for each of the four scoring criteria are:							
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>							
<ul> <li>Scores will be provided based upon the applicant's submission of documentation of additional resources which will provide assistance to LMI households in coordination with the CDBG housing programs.</li> <li>4. <u>Project Readiness – Maximum Score 30 Points</u></li> <li>Scores will be provided based upon the applicant's submission of documentation that all administrative and technical issues involved in assuring a successful housing project have been addressed</li> </ul>							
					Application Guidelines and forms can be found at: https://www2.illinois.gov/dceo/CommunityDevelopment/Pages/default.aspx		

Describe the process for awarding funds to state recipients and how the state will make its allocation available	N/A
to units of general local government, and non- profit organizations, including community and faith-based organizations. (ESG only)	
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	Program Category	Budget	Ceiling [	Deadline
will be allocated among	Ongoing (non-competitive Programs			
funding categories.	Economic Development (ED)	\$ 3,000,000	\$1,000,000	NA
	Disaster Response (DR)	\$ 1,304,606	\$ 250,000	NA
	Competitive Programs			
	Public Infrastructure (PI)	\$17,500,000	\$1,500,000	10/19/2022
	Housing Rehabilitation (HR)	\$ 7,000,000	\$ 650,000	10/19/2022
Describe threshold factors and grant size limits.	Benefit to Low-and-Moderate Income I proposed project will benefit 100% low 100% low-to-moderate income persons	-to-moderate ir	ncome persons	. Those projects benefiting less than
	Minimum grant award is \$300,000; gra	nt ceiling is \$65	0,000	

	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 \$650,000 to equal 10.8 grants, required by the required number of homes (10) per grant to equate to 108
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

Describe all of the	Projects will be evaluated according to the criteria noted below.
criteria that will be used	1. Inclusion in an Opportunity Zone (5 percent of overall score)
to select applications	2. Inclusion in a DCEO Underserved Area (5 percent of overall score)
and the relative importance of these criteria.	<ol> <li>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 w 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.</li> </ol>
	<ol> <li>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 \$150,000 or more of the total project costs. No points will be assigned to projects contributing less than \$50,000.</li> </ol>
	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
	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
If only summary criteria	Application Guidelines and forms can be found
were described, how	at: https://www2.illinois.gov/dceo/CommunityDevelopment/Pages/default.aspx
can potential applicants	
access application	
manuals or other	
state publications	
describing the	
application criteria?	
(CDBG only)	

Describe the process for awarding funds to state recipients and how the state will make its allocation available	N/A
to units of general local government, and non- profit organizations, including community and faith-based organizations. (ESG only)	
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	Program Category	Budget	Ceiling	Deadline
will be allocated among	Ongoing (non-competitive Programs			
funding categories.	Economic Development (ED)	\$ 3,000,000	\$1,000,00	00 NA
	Disaster Response (DR)	\$ 1,304,606	\$ 250,000	NA
	Competitive Programs			
	Public Infrastructure (PI)	\$17,500,000	\$1,500,00	0 10/19/2022
	Housing Rehabilitation (HR)	\$ 7,000,00	0 \$ 650,00	0 10/19/2022
Describe threshold	1.Low to Moderate Income Benefit Re	quirement: Eac	h application	must include documentation that the
factors and grant size	proposed project will benefit at least 5	1.0 percent LM	l persons.	
limits.	2.Documentation of Threat to Health a needs to be addressed by the propose	-	h application	should detail the public infrastructure
	3.Water and Sewer Rates: A fundame sufficient to fund the entire cost of uti		-	inancing is that user rates should be
	Minimum grant award is \$300,000; gra	nt ceiling is \$1,	500,000	
		_		

	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 \$17,500,000 by the grant ceiling of \$1,500,000; equating to 11.6; and then multiplying by the average number of persons served by each Public Infrastructure grant (500); equaling 5,833
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).
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 fo 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)	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
Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPW/ only)	N/A

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)

crite to s and imp	scribe all of the ceria that will be used select applications d the relative portance of these ceria.	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
wer can acce	only summary criteria re described, how n potential applicants cess application nuals or other	IHDA's Multifamily common application system, forms, and instruction are posted on IHDA's website at www.ihda.org/developer/forms.htm#referenceDocuments
dese app	te publications scribing the plication criteria? DBG only)	

Describe the process for awarding funds to state recipients and how the state will make its allocation available	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
to units of general local government, and non- profit organizations, including community and faith-based organizations. (ESG only)	
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.	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
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?	<ul> <li>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:</li> <li>Accessibility for the purpose of creating suitable living environments</li> <li>Accessibility for the purpose of creating economic opportunities</li> <li>Affordability for the purpose of providing decent affordable housing</li> <li>Affordability for the purpose of creating suitable living environments</li> <li>Sustainability for the purpose of creating suitable living environments</li> <li>Sustainability for the purpose of providing decent affordable housing</li> <li>Sustainability for the purpose of providing decent affordable housing</li> </ul>
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.

Describe all of the criteria that will be used to select applications and the relative importance of these criteria.	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.
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	N/A
to units of general local government, and non- profit organizations, including community and faith-based organizations. (ESG only)	
Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)	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.

Describe how resources will be allocated among funding categories.	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.	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.

	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.
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

Describe the process for awarding funds to state recipients and how the state will make its	N/A
allocation available	
to units of general local government, and non- profit organizations, including community and faith-based	
organizations. (ESG only)	
Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other	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
community-based	linkages with service providers, and providing a continuum of care to persons with HIV/AIDS. The work
organizations). (HOPWA	plan will include descriptions of populations to be served, the care and service needs of the populations
only)	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.

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.
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 2022 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 2022 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	N/A
to units of general local government, and non- profit organizations, including community and faith-based organizations. (ESG only)	
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 2022 federal grant area.

Describe how resources will be allocated among funding categories.	Not Provided in the 2022 federal grant area.
Describe threshold factors and grant size limits.	Not Provided in the 2022 federal grant area.

	What are the outcome measures expected as a result of the method of distribution?	Not Provided in the 2022 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.

Describe all of the criteria that will be used to select applications and the relative importance of these criteria.	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.
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 loca government, and non- profit organizations, including community and faith-based organizations. (ESG only)	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
Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPW, only)	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.

Describe how resources will be allocated among funding categories.	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.
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

Describe all of the criteria that will be used to select applications and the relative importance of these criteria.	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.
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	N/A
to units of general local government, and non- profit organizations, including community and faith-based organizations. (ESG only)	
Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)	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

	Describe how resources will be allocated among funding categories.	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. 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
	Describe threshold factors and grant size limits.	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.

	What are the outcome measures expected as a result of the method of distribution?	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.
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.

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

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

Describe how resources will be allocated among funding categories.	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.
Describe threshold	Project Sponsors that are located in the State of Illinois can submit a request for providing Tenant Based
factors and grant size	Rental Assistance. Project Sponsors will receive funding to service persons living with HIV/AIDS who need
limits.	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.
13	State Program Name:	National Housing Trust Fund
	Funding Sources:	HTF

Describe the state program addressed by the Method of Distribution.	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 2022 funding cycle.
	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 2022 HTF Allocation Plan.
	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.
	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.
	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.

Describe all of the	IHDA will use its Multi-Family "Common Application" as the major application format for HTF rental
criteria that will be used	housing projects, the same one used for the LIHTC and HOME programs, along with supplemental
to select applications	information required by program rules (see below). IHDA's process will include an initial
and the relative	completeness/eligibility scoring, review of mandatory requirements, underwriting, site and market review,
importance of these	peer review, internal Loan Committee and IHDA Board approval. A separate Request for Applications (RFA)
criteria.	process will be used if needed to expedite obligation of program funds. Under the RFA, IHDA requires that
Cincental	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 2022 Allocation Plan of HTF, and reserves said right in following
	years
	Geographic Diversity: 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.
	Applicant Capacity: 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.
	Project-Based Rental Assistance: 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 rent

	Duration of Affordability Period: 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
	periods). Applicants are encouraged to establish longer affordability periods but must meet this minimum. <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.
If only summary criteria were described, how can potential applicants access application manuals or other	N/A
state publications describing the	
application criteria? (CDBG only)	

Describe the process for awarding funds to state recipients and how the state will make its allocation available	N/A
to units of general local government, and non- profit organizations, including community and faith-based organizations. (ESG only)	
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.	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 2022 Illinois HTF allocation is \$33,710,562. There is also allowance to use up to 10% of all funds (\$3,371,056 in 2022) 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.
Describe threshold factors and grant size limits.	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 Maximum HTF Grant Limit is \$9,000,000, not to exceed 90% of total projects cost.

What are the outcome measures expected as a result of the method of	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.
distribution?	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:
	<ul> <li>Accessibility for the purpose of creating suitable living environments</li> <li>Accessibility for the purpose of creating economic opportunities</li> <li>Affordability for the purpose of providing decent affordable housing</li> <li>Affordability for the purpose of creating economic opportunities</li> <li>Sustainability for the purpose of creating suitable living environments</li> <li>Sustainability for the purpose of providing decent affordable housing.</li> </ul>

#### Discussion:

## AP-35 Projects – (Optional)

#### Introduction:

Project will be added as they are board approved

#	Project Name	
1	IHDA HOME Admin FY22	
2	Kirwan Apts MHR-11623	
3	Impact Floral MHR-11615	
4	Carrie Lane MHR-11900	
5	Lincoln Lofts Phase II MHR-11832	
6	IHDA NHTF Admin FY22	
7	Access Health & Housing MHR-11431	

Table 11 – Project Information

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

## **AP-38 Project Summary**

### **Project Summary Information**

1	Project Name	IHDA HOME Admin FY22
	Target Area	
	Goals Supported	
	Needs Addressed	
	Funding	:
	Description	
	Target Date	
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	
2	Project Name	Kirwan Apts MHR-11623
	Target Area	Statewide Distribution
	Goals Supported	Multifamily Affordable Housing
	Needs Addressed	Affordable Housing
	Funding	HOME: \$7,212,015
	Description	
	Target Date	
	Estimate the number and type of families that will benefit from the proposed activities	20 Low-Income Households

	Location Description	Waukegan, Illinois
	Planned Activities	Acquisition and Rehab
3	Project Name	Impact Floral MHR-11615
	Target Area	Statewide Distribution
	Goals Supported	Multifamily Affordable Housing
	Needs Addressed	Affordable Housing
	Funding	HOME: \$3,407,042
	Description	
	Target Date	
	Estimate the number and type of families that will benefit from the proposed activities	11 Low-Income Households
	Location Description	Skokie, Illinois
	Planned Activities	New Construction
4	Project Name	Carrie Lane MHR-11900
	Target Area	Statewide Distribution
	Goals Supported	Multifamily Affordable Housing
	Needs Addressed	Affordable Housing
	Funding	HOME: \$2,255,368
	Description	
	Target Date	
	Estimate the number and type of families that will benefit from the proposed activities	10 Low-Income Households
	Location Description	Decatur, Illinois

	Planned Activities	New Construction
5	Project Name	Lincoln Lofts Phase II MHR-11832
	Target Area	Statewide Distribution
	Goals Supported	Multifamily Affordable Housing
	Needs Addressed	Affordable Housing
	Funding	HOME: \$2,650,000
	Description	
	Target Date	
	Estimate the number and type of families that will benefit from the proposed activities	14 Low-Income Households
	Location Description	Bloomington, Illinois
	Planned Activities	New Construction
6	Project Name	IHDA NHTF Admin FY22
	Target Area	
	Goals Supported	
	Needs Addressed	
	Funding	HTF: \$3,070,261
	Description	
	Target Date	
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	

7	Project Name	Access Health & Housing MHR-11431
	Target Area	Statewide Distribution
	Goals Supported	Housing Trust Fund Goals
	Needs Addressed	Affordable Housing
	Funding	HTF: \$2,450,000
	Description	
	Target Date	
	Estimate the number and type of families that will benefit from the proposed activities	20 Extremely Low Income Households
	Location Description	Maywood Illinois
	Planned Activities	New Construction

DRAFT 2022 Action Plan – State of Illinois

## 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 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 nonentitlement/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	100

Table 12 - 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, owneroccupied 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	275	
Special-Needs	300	
Total	2,575	

Table 13 - One Year Goals for Affordable Housing by Support Requirement

One Year Goals for the Number of Households Supported Through		
Rental A	Assistance	300
The Pro	duction of New Units	99
Rehab o	of Existing Units	176
Acquisit	tion of Existing Units	0
Total		575
	One Veen Ceels for Affordable Housing by Common	

Table 14 - 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 51 new units includes anticipated units through National Housing Trust Fund

Rehab of 35 existing units includes anticipated units through National Housing Trust Fund

Rehab of existing units includes 108 anticpated units through CDBG single-family Housng 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 <u>17,500</u> 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 projectbased/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:				
	1			
Short-term rent, mortgage, and utility assistance to prevent homelessness of the individual or				
family	100			
Tenant-based rental assistance	200			
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	300			

# 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 the 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

<u>Affordable Housing Planning Appeals Act:</u> 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. <u>Accessibility:</u> 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

<u>LIHTC</u>: 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 Externely 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 Generl 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.

The Illinois Department of Commerce and Economic Opportunity applied for and received a \$3.6 million Lead Based Paint Hazard and Control grant funded by HUD. The grant is targeted in Galesburg, Illinois, which has one of the highest numbers of EBLs in the State. The grant is remediating lead hazards in homes, providing training for contractor certification, and funding a study to determine the best approach to decrease lead risks. The grant is being extended into 2023 to allow the State to reach its goals.

#### 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 antipoverty 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 lowincome persons to become more self-sufficient. It is administered by DCEO at the State level, which funds the statewide network of CAAs and related organizations on an annual basis, contingent on federal funding. Uses of CSBG funds include the following: economic development; education; emergency assistance; health; housing; income management; linkages; nutrition; and self-sufficiency. IHDA funds a number of local CAAs for housing rehabilitation programs.

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

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

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

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

Risk Sharing Program.

(6)IHDA administers the State-funded Rental Housing Support Program (RHSP), which targets rental assistance to households at 15-30% area median income. 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 Councii 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:

- 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.
- 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

### 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	0
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 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 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 the 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 the fair market value before rehab and fair market value after rehab. See below for affordability provisions.

HOME FUNDS PROVIDED AFFORDABILITY PERIOD

<\$15,000 5 Years

\$15,000-\$40,000 10 Years

>\$40,000 15 Years

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

 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.

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 setforth in 24 CFR Part 576
- must provide matching contributions from eligible sources in an amount equal to the amount of requested ESG Program funds from the subrecipient for all activities as prescribed in 24CFR Part 576. At a minimum, 50% of the match contributions must be cash
- must obtain written approval from DHS prior to subgranting any portion of ESG Program funds to any other entity to perform ESG eligible activities
- must obtain written agreements from all ESG subgrantees requiring the subgrantee to comply with all DHS policies and timelines, the provisions of the DHS community service agreement, and all program rules and regulations as set forth by DHS and 24 CFR Part 576, which is identical to the obligations of the ESG subrecipients
- must provide DHS with accurate quarterly fiscal and service ESG reports on a quarterly basis

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

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

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

Applications submitted by eligible recipients

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

N/A

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

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

Non-profit, for-profit, and joint-venture developers are eligible to apply for funds under the PSH Development Program. PSH development and operation requires knowledge and skill sets that may not currently exist in full at any one organization. Projects that build on the strengths of several organizations, including development partners, will be accepted. The roles, responsibilities, and capacity (including financial capacity) of each entity will be analyzed. In cases where the source of funding is the national Housing Trust Fund, eligible applicants must meet all Authority Standards including standards set out in 24 CFR 93.2 for the national Housing Trust Fund

(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 \$9,000,000, 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. Mandatory 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 federal HTF Program will include the following:

• Rental housing development (new construction or acquisition/rehabilitation) Eligible project costs include 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 federal 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 subsides, 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 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 Permanent Supportive Housing RFA Section 3, all Applications must include a signed Permanent Supportive Housing Development Program Application Certification.

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:

- The Application must include a full organizational chart reflecting all entities within the proposed Owner down to individuals including percentages of ownership
- The Application must include an Identity of Interest form for the Sponsor
- 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 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 restrict 100% of the units to households ≤30% AMI. 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 signed Permanent Supportive Housing Development Program Application Certification.

- Take actions to affirmatively further fair housing;
- Give preferential treatment to persons on the Public Housing Authority (PHA) waiting list(s) and make on-going efforts to request that the PHA make referrals to the Project, or request that the PHA include relevant information about the Project on any listing the PHA makes available to persons on its waiting list(s);
- Have a tenant selection plan preference for veterans;
- Minimize involuntary displacement of low-income households;

Be willing to accept current or future State-administered operating subsidy or project based rental assistance, should it become available, on units that are not already subject to a rental assistance contract. Certification of this willingness will not be required of those with already-committed rental or operating assistance for 100% of units. This assistance would likely be limited to a maximum of 30% of

units within a given Project, would likely be reserved for households referred through a statewide referral network, and may be targeted to Projects located in specific areas of the State based on need.

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 Asisstane 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 Characterisitcs 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 2022-2023 QAP and are valid through 2023. 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.

8. **Rehabilitation Standards.** The grantee must establish rehabilitation standards for all HTFassisted 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; Capital Needs Assessments (if applicable); and broadband infrastructure (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

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

Grantee Unique Appendices



# **REQUEST FOR APPLICATIONS**

# Permanent Supportive Housing Development Program

**Round IX** 

167

Deadline:

5:00 P.M. on December 16, 2022

**Kristin Faust** 

EXECUTIVE DIRECTOR

ILLINOIS HOUSING DEVELOPMENT AUTHORITY

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### **Request for Applications**

## Permanent Supportive Housing Development Program

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## **Section 1: Definitions**

**Applicant** – shall mean the Sponsor that has applied for funds pursuant to this Request for Applications (RFA). The Applicant includes all individuals and entities of which the Owner is comprised.

**Application** – shall mean an entire set of required and requested documents, in electronic form, as prescribed in this Request for Applications and submitted by an Applicant to the Authority.

**Area Median Income (AMI)** – shall mean the median income of the county or the metropolitan statistical area in which the project is located, adjusted for family size, as such adjusted income and median income for the area are determined from time to time for purposes of Section 8 of the United States Housing Act of 1937.

Authority – shall mean the Illinois Housing Development Authority (IHDA).

**Board** – shall mean the Members of the Authority's governing body, appointed by the Governor of Illinois.

**Funding Agreement** – shall mean the document that outlines the terms and conditions of a funding award.

**Geographic Set-Aside** – shall mean Projects will be categorized by Set-Asides defined below:

a) The City of Chicago Set-Aside consists of the City of Chicago.

b) The Chicago Metro Set-Aside consists of the areas within the counties of DuPage, Kane, Lake, McHenry, Will, and Cook excluding the City of Chicago.

c) The Other Metro Set-Aside consists of areas identified as Other Metro. For a list of the areas identified as Other Metro, see "Other Metro Set-Aside Places" on the Website.

d) The Non-Metro Set-Aside consists of all other areas of the state not included in the City of Chicago, Chicago Metro, or Other Metro set-asides.

Members – shall mean the duly appointed Board members of the Authority.

**Owner** – shall mean the duly formed, validly existing, single purpose entity, organized under the laws of the State of Illinois, or any other state, that is awarded funds for a Project pursuant to this Request for Applications and which owns or will own the Project. The Owner shall be owned or controlled by the Sponsor.

**Participant** – shall mean a member of the Project's development team, including Sponsor, general contractor, architect, and property manager.

**Permanent Supportive Housing** – shall mean a Project with a preference or restriction for people who need supportive services to access and maintain affordable housing, including households who are experiencing or at risk of homelessness, are living with chronic disabilities, and/or are experiencing or at risk of institutionalization. Supportive services must be appropriate to the needs and preferences of residents and be available either on-site or closely integrated with the housing. The housing should be permanent (not time-limited, not transitional), affordable (typically rent-subsidized or otherwise targeted to extremely-low-income tenants who make ≤30% of the area median income), and independent (tenant holds the lease with normal rights and responsibilities). Services should be flexible

(responsive to tenants' needs and desires), voluntary (participation is not a condition of tenancy), and sustainable (focus of services is on maintaining housing stability and good health).

**Pre-Screening, Assessment, Intake, and Referral (PAIR) Module** – shall mean the online waiting list system that has the SRN and Section 811 unit waiting lists.

**Project** – shall mean an existing or proposed qualified project which satisfies, or will satisfy, all of the requirements of this Request for Applications and the Authority.

**Project Concept Meeting** – shall mean a mandatory meeting (virtual or in-person) between an Applicant and the Authority to occur prior to Application submission where the Applicant outlines their Project concept including: intended population served, project size, project type, proposed financing structure, and proposed partnerships, if any.

**Regulatory Agreement** – shall mean a document that outlines the terms of the thirty (30) year period during which a Project must comply with the occupancy restrictions (both income and rent) and amenities represented in the Project's Application.

**Site** – shall mean a parcel of land on which the Project will be developed, described by a unique legal description which will be encumbered by the Regulatory Agreement. A Project may consist of multiple Sites.

Sponsor – shall mean a duly formed, validly existing entity, organized under the laws of the

State of Illinois, or any other state, that is applying for funds for a Project pursuant to this Request for Applications. The Sponsor shall own or control the Owner of the Project. Project consultants and other like professionals shall not be considered as Sponsors.

Website – shall mean <u>http://www.ihda.org</u>.

## Permanent Supportive Housing Development Program Overview

The Illinois Housing Development Authority (the Authority) has created the Permanent Supportive Housing (PSH) Development Program to increase housing options for Illinoisans who either are in need of Permanent Supportive Housing or need reduced barriers to housing.

The Authority expects most Projects will be 25 or fewer units; however, Projects larger than 25 units may be proposed based on location, demand, sponsor capacity, and financial feasibility. Regardless of the number of units, the Authority expects most Projects will be 100% PSH.

### A. Eligible Activities

Eligible activities under the Permanent Supportive Housing Development Program include but are not limited to:

- Acquisition
- New Construction
- Rehabilitation of Existing Occupied Units
- Rehabilitation of Vacant Units, and/or
- Adaptive Reuse of Non-Residential Properties

The Authority welcomes creative models that will help meet a diverse array of needs. Projects may offer PSH units in a range of settings, including single and scattered-site projects.

Funding under this RFA may be used to create office space that is specifically used for social services or building management; additional office space must be paid for by a non-Authority source.

Transitional housing is an ineligible activity under this RFA.

### B. Eligible Applicants

Non-profit, for-profit, and joint-venture developers are eligible to apply for funds under the PSH Development Program. PSH development and operation requires knowledge and skill sets that may not currently exist in full at any one organization. Projects that build on the strengths of several organizations, including development partners, will be accepted. The roles, responsibilities, and capacity (including financial capacity) of each entity will be analyzed. In cases where the source of funding is the national Housing Trust Fund, eligible applicants must meet all Authority Standards including standards set out in 24 CFR 93.2 for the national Housing Trust Fund.

### C. Amount and Types of Funding

Up to \$9,000,000 or 90% of the total Project cost at Application, whichever is less, may be requested per Project. However, the Authority reserves the right to waive this limitation in its sole discretion.

The Authority will evaluate the feasibility of each Project and then determine which Authority administered funding source(s) are eligible and most appropriate. The amount of funding to be awarded will not exceed the amount necessary to make the Project financially feasible, as determined by the Authority. The Authority may add or remove costs as deemed necessary to support the development and operation of the Project. Awards may be in the form of loans, forgivable loans, or grants.

Potential Authority administered programs that will be evaluated for award by the Authority include, but are not limited to, Illinois Affordable Housing Trust Fund, HOME Investment Partnerships Program (including American Rescue Plan), National Housing Trust Fund, Capital Bond Funds, Illinois Affordable Housing Tax Credit, and Financing Adjustment Factor Program. Projects receiving Capital Bond Funds/Rebuild Illinois State Capital Bill funds will be subject to the Illinois Works Jobs Program Act (30 ILCS 559/20-1 *et seq*.): For grants with an estimated total project cost of \$500,000 or more, the grantee will be required to comply with the Illinois Works Apprenticeship Initiative (30 ILCS 559/20-20 to 20-25) and all applicable administrative rules. The "estimated total project cost" is a good faith approximation at the time an applicant submits to the Authority a grant application of the costs of an entire project being paid for in whole or in part by appropriated capital funds to construct a public work. The goal of the Illinois Apprenticeship Initiative is that apprentices will perform either 10% of the total labor hours actually worked in each prevailing wage classification or 10% of the estimated labor hours in each prevailing wage classification, whichever is less. Grantees will be permitted to seek a waiver or reduction of this goal in certain circumstances pursuant to 30 ILCS 559/20-20(b). The grantee must ensure compliance for the life of the entire project, including during the term of the grant and after the term ends, if applicable, and will be required to report on and certify its compliance.

For purposes of compliance with the Comprehensive Planning Act (310 ILCS 110) this RFA may also be referred to as a "notice of funding availability." In addition, it will also be considered a "special initiative" as such term is used in the Annual Comprehensive Housing Plan required by the above statute.

The Authority reserves the right to select the funding source(s) for all Projects. One or more of the aforementioned funding sources may not be available or appropriate. All funding awards, including the amount of the award and the funding source, remain subject to the final approval of the Authority's Board.

Applicants should consult with an accountant to explore any potential tax consequences for an award of funds. Applicants should be aware that each funding source has its own set of rules and regulations and should become familiar with those rules and regulations. While the Authority reserves the right to select the funding source, Sponsors may, in their project narrative, outline reasons why they believe certain funding sources may be more appropriate to their Project than others.

#### D. Income Restrictions

One hundred percent (100%) of the units in the Project must be affordable to those  $\leq$  30% of the Area Median Income (AMI) and shall be restricted as such for thirty (30) years.  $\leq$ 30% AMI units, if assisted by project based rental assistance, may receive higher rents through their rental assistance contract. Sponsors may propose Projects with fewer than 100% of the units restricted at  $\leq$ 30% AMI at the mandatory Project concept meetings stage of the application process, and the Authority may at its sole discretion wave this requirement. If the requirement is waived the Authority will issue a waiver letter documenting the reasons for the waiver being granted.

Each Project funded under this RFA will be required to execute at initial closing a Regulatory Agreement which outlines the terms of the thirty (30) year compliance period during which a Project must comply with the occupancy restrictions (both income and rent) and amenities represented in the Project's Application. Further, each Project funded through the PSH Development Program must comply with the requirements imposed by its most restrictive funding source. To the extent that specific funding sources are already committed or requested, Applicants must demonstrate the ability to comply with the most restrictive requirements.

### E. Target Populations

All Projects must be disability-neutral unless a committed or anticipated capital or operating subsidy source requires disability-specific targeting. Examples of this include but are not limited to: Housing Opportunities for Persons with HIV/AIDS (HOPWA) and Illinois Department of Human Services Bridge Subsidy. Unless otherwise dictated by another committed capital or operating subsidy source, units must be open to households headed by persons with any type(s) of chronic disability who otherwise meet Project-specific screening criteria.

### F. Priority Activities

As reflected in Section 4: Application Scoring Criteria, priority will be given to Projects that:

- Leverage other capital funding sources;
- Offer operating assistance or project-based rental assistance;
- Incorporate universal design, green design, and/or energy efficiencies;
- Provide units for individuals exiting the criminal justice system, youth aging out of Illinois Department of Children and Family Services' care and/or persons living with an intellectual or developmental disability;

- Offer access to public transit and/or be sited in proximity to neighborhood amenities and community services; and
- Assemble a diverse and inclusive development team.

### G. Project Concept Meeting

The Authority will establish a timeframe between release of this RFA and the Mandatory Application Workshops during which all potential applicants will be required to schedule a project concept meeting. This meeting can be viewed as a "pitch" meeting to Authority staff, and applicants should be ready to outline their Project concept including: intended population served, project size, project type, proposed financing structure, and proposed partnerships, if any. Project concept meetings may be virtual meetings.

### H. Mandatory Application Workshops

Applicants who have had at least one Project Concept Meeting and intend to submit an Application will be required to attend an Application workshop. Workshops may be offered in-person and/or via an online platform.

## **Section 2: Application Submission and Evaluation Process**

### A. Application Submission

Applications are accepted online. Applications will not be accepted in paper form. Please direct any questions to <u>pshrfa@ihda.org</u>. Specific instructions for submitting application materials will be posted online on the Website.

All Application materials will be available on the Website at least 60 days prior to the Application deadline.

### B. Public Notice by the Authority

The Authority will send public notice letters to public officials and agencies as notification that an Application for funding has been received by the Authority, and to request comments. The notices will be sent to the following public officials of the area in which the Project is to be located: (1) the County Board Chair, Mayor, or chief local elected official; (2) the Illinois General Assembly members; and (3) the U.S. Congressional Representative and U.S. Senators.

The Authority's public notice requires that any written comments be sent to the Authority and the Applicant within 30 days. The Applicant is required to respond in writing to all comments received and to submit copies of all correspondence to the Authority.

### C. Evaluation of Applications

Applications will be evaluated in the following manner:

- 1. **Completeness of Application** The Application must be received by the designated Application deadline and will be reviewed for completeness. This includes the following:
  - Completed Application forms and supporting documentation;
  - Appropriate signatures on all necessary documents; and
  - Payment of non-refundable Application fee.

If the Authority finds that the Application is not complete it reserves the right to reject the Application and notify the Applicant with stated reason(s) for denial.

- 2. **Mandatory Criteria** If the Authority determines that the Application is complete it will be reviewed to determine if the Project meets the mandatory requirements set forth in the Mandatory Requirements section below.
- 3. **Scoring Criteria** If an Application has met all of the Mandatory Requirements it will be reviewed and assigned a score based on the categories set forth in the Scoring Criteria section below.

# **Section 3: Mandatory Application Criteria**

The Permanent Supportive Housing Development Program Application Checklist that corresponds with the outline below is available on the Website and must be completed and submitted with the Application. All Application materials will be available on the Website at least 60 days prior to the Application deadline.

Only Projects that demonstrate readiness to proceed with financing and development will be considered, as evidenced by meeting Mandatory application criteria described in this Section. The Authority reserves the right to rescind any award of funds that is unable to close within ten months from the date of award.

# A. Permanent Supportive Housing Development Application Certification

All Applications must include a signed Permanent Supportive Housing Development Program Application Certification, Organizational Chart, and an Identity of Interest form, found on the Website, which provide a written certification that the Project will:

- Take actions to affirmatively further fair housing;
- Give preferential treatment to persons on the Public Housing Authority (PHA) waiting list(s) and make on-going efforts to request that the PHA make referrals to the Project, or request that the PHA include relevant information about the Project on any listing the PHA makes available to persons on its waiting list(s);
- Have a tenant selection plan preference for veterans;
- Minimize involuntary displacement of low-income households;
- Restrict 100% of the units to households ≤30% AMI;
- Be willing to accept current or future State-administered operating subsidy or project based rental assistance, should it become available, on units that are not already subject to a rental assistance contract. Certification of this willingness will not be required of those with already-committed rental or operating assistance for 100% of units. This assistance would likely be limited to a maximum of 30% of units within a given Project, would likely be reserved for households referred through a statewide referral network, and may be targeted to Projects located in specific areas of the State based on need.

The Authority intends to seek all sources of operating subsidy or rental assistance that are currently available or may become available in the future and may wish to target any assistance identified to Projects that serve priority populations.

Such assistance cannot be assumed to be available to support the Project's operating budget at the time of application through the Permanent Supportive Housing Development Program.

# B. Multifamily Fee Payment Form and Non-Refundable Application Fee

All Applications must include a completed Multifamily Fee Payment Form and a copy of the check for payment of the non-refundable Application fee. The Multifamily Fee Payment Form may be found on the Website; the Application fee is listed on the form. All fees must be sent to:

Illinois Housing Development Authority Receipts and Fees

26411 Network Place

Chicago, IL 60673-1264

C. The Authority's Common Application

All Applications must include a completed Common Application. This form can be found on the Website.

D. Project Narrative

All Applications must include a Project narrative that includes:

- Amount of funding requested;
- Number of total units in the Project;
- Number of PSH units proposed;

• If the Application is for an existing Project, applicant must describe all existing use restrictions, restrictive funding sources, and submit a current rent roll that includes the unit size, household size, household income, and current rent.

Applicants are encouraged to provide as much detail and background information about the Project as possible. Detailed information will assist the Authority in determining whether there is adequate market demand for the Project in terms of unit mix and rental structure; the Project is located in an area with a shortage of PSH units; and the Project is sited in a community that will meet the needs of the tenants.

#### E. Neighborhood Assets Map

All Applications must include a neighborhood assets map that clearly delineates the location of the Project along with neighborhood assets within the applicable proximity radius, which varies based on the Geographic Set-Aside. Proximity thresholds are based on Geographic Set-Aside (see Section 1: Definitions). In addition, the Application must include a table referencing each neighborhood asset identified on the map and stating the asset category and address. Please see Application Scoring Criteria Section J for neighborhood asset categories.

The Authority reserves the right to mandatorily fail Project Applications that include fewer than two (2) neighborhood assets within the proximity radius for the applicable Geographic Set-Aside. See table below:

Proximity Radius by Set-Aside		
City of Chicago	.25 miles	
Chicago Metro	.5 miles	
Other Metro	.75 miles	
Non-Metro	1 mile	

Please note that the documentation provided for this Mandatory criteria can also be used for the Application Scoring Criteria Section J to demonstrate additional neighborhood assets. Please see that section for further details.

#### F. Site Control

All Project Sites must be identified in the Application. Projects consisting of multiple Sites must satisfy site control requirements for all Sites.

The Application must include all of the following:

- A map showing the location(s) of the Site(s). If Site control is for property larger than the Site(s), the Site(s) must be delineated on the map.
- Aerial photograph(s) of the Site(s) with the boundaries of the Site(s) clearly delineated, and surrounding uses clearly visible; and
- Evidence of Site control, which can only be demonstrated with Site control documentation for each Site consisting of one of the following:
  - A fee simple interest in the Site in the name of the Sponsor or Owner; or
  - A fully executed, binding agreement with a term ending no sooner than six (6) months after the Application deadline, signed by both the Sponsor or Owner and the seller for the purchase of the Site; or
  - A fully executed, binding agreement with a term ending no sooner than six (6) months after the Application deadline, signed by both the Sponsor or Owner and the seller for the long-term lease of the Site with a lease term of at least ninety-nine (99) years; or
  - A fully executed, binding agreement with a term ending no sooner than six (6) months after the Application deadline, signed by both the Sponsor or Owner and the seller of the Site evidencing land and/or building donation; or

• When the Site is owned by a governmental entity, a letter of intent to the Sponsor or Owner from the governmental entity to sell, donate, or enter into a long-term lease of the Site with a term ending no sooner than six (6) months after the Application deadline.

Site control documentation must include all of the following clearly marked/highlighted:

- 1. Expiration date for purchase option(s), purchase agreement(s), or letter(s) of intent;
- 2. Legal description pursuant to the site control document;
- 3. The sale or lease price of the Site(s). The Project budget in the Common Application for the Project may only include the acquisition costs attributable to the Site. If site control documentation is for property larger than the Site, a detailed narrative and calculation of the Site sale or lease price on a per square footage basis must be submitted.
- 4. Language that complies with the environmental review and voluntary acquisition guideline language outlined in the Site Control Compliance Language example on the Website.

If language is not included in the Site control documentation, evidence of compliance with this section can only be demonstrated by submitting a copy of language notification receipt by seller (e.g., certified mail, return receipt requested) and the date of delivery with countersignature by seller. Without language regarding compliance with environmental review and voluntary acquisition, Sponsors may be precluded from applying to the Authority for federal resources.

#### G. Zoning

The Application must include evidence that all Sites are either currently zoned for the proposed use or will be addressed through an already initiated zoning change or Planned Development or Planned Unit Development ("PUD") process.

#### **1. Zoned Project Sites**

Evidence that Sites are currently zoned for the proposed use can only be demonstrated through:

- A valid building permit; or
- A letter from the local zoning administrator (or chief elected official in localities without a zoning administrator) identifying the Project and containing all of the following:
  - 1) The location of the Site (s) (i.e., address or street crossings); and
  - 2) The current zoning and any special use designations; and
  - 3) A description of the Project (including number of units, proposed use, and whether it is new construction, rehabilitation, or both); and
  - 4) A statement that the current zoning will permit the proposed Project.

#### 2. Sites with Pending Re-Zoning, Variance, or Special Use Applications

The Authority recognizes that a sponsor may need a re-zoning, a variance to existing zoning that does not require a full re-zoning, or a special use permit and will allow for the above as follows. As evidence of the pending re-zoning, variance, or special use permit application, the application must include a letter from the local zoning administrator (or chief elected official in localities without a zoning administrator) identifying the Project and containing all of the following:

1) The location of the Site(s) (i.e., address or street crossings); and

2) A description of the Project (including number of units, proposed use, and whether it is new construction, rehabilitation, or both); and

3) A written explanation of the re-zoning, variance, or special use permit approval process; and

4) Evidence the re-zoning, variance, or special use permit process has been initiated; and

5) Evidence of which stage in the re-zoning, variance, or special use permit approval process the Project has reached; and

6) Evidence that the re-zoning, variance, or special use permitting will be reviewed in a timely manner, including any available dates.

#### 3. PUD Project Sites

In cases where zoning will be addressed through a PUD process, sponsors must indicate whether the PUD already exists or whether it is yet to be established.

If the PUD already exists the application should indicate what, if any, amendments are required.

If the PUD is yet to be established the application should indicate where the PUD stands in the approval process, the additional steps required to complete the approval process, and an estimated timeline for completion.

As evidence of the PUD status, the application must include a letter from the local zoning administrator (or chief elected official in localities without a zoning administrator) identifying the Project and containing all of the following:

1) The location of the Site(s) (i.e., address or street crossings); and

2) A description of the Project (including number of units, proposed use, and whether it is new construction, rehabilitation, or both); and

3) A written explanation of the PUD approval process; and

- 4) Evidence the PUD process has been initiated; and
- 5) Evidence of which stage in the PUD approval process the Project has reached; and

6) Evidence that the PUD will be reviewed in a timely manner, including any available dates.

#### H. PSH Environmental Checklist

The Application must include a completed PSH Environmental Checklist which may be found on the Website. If funded, the Authority will require as a condition of closing a Phase I environmental site assessment covering all Sites completed within one (1) year prior to the Application deadline according to the Authority's Standards for Environmental Reviews and Professionals available on the Website, including all appendices. If a Phase II is available, it may be submitted along with the Phase I. In addition, a narrative explanation of any identified Recognized Environmental Condition (REC) should be submitted. The explanation must include how these conditions will be addressed and a breakdown of any associated costs. Any associated costs must be included in development budget. The Authority reserves the right to require an environmental contingency as well as modify the construction scope based on a review of the explanation.

#### I. Site Physical Information

# 1. 1% Floodplain or Floodway

The Application must include a Federal Emergency Management Agency ("FEMA") floodplain map covering the Project area with the boundary of all Sites clearly delineated. FEMA floodplain maps can be obtained from the FEMA website at <u>https://msc.fema.gov/portal/home</u>.

If any portion of a Site is located within the 1% floodplain or floodway, the Application must include one or both of the following as applicable:

#### a. Rehabilitation

Projects proposing the rehabilitation of existing buildings on Sites within the 1% floodplain or floodway must submit a site plan that clearly indicates all of the following:

- Historic frequency of flooding and flood-related repairs;
- The FEMA determined elevation of the floodplain or floodway; and
- The elevation of the lowest floor level in the existing buildings; and
- The location of the existing buildings; and
- Evidence that the Site is enrolled or is eligible to enroll in the National Flood

Insurance Program.

Note: Projects involving the rehabilitation of existing buildings on Sites located in the 1% floodplain or floodway will only be permitted if the lowest existing floor elevation of each building in the floodplain is at least six (6) inches above the FEMA designated floodplain elevation.

#### b. New Construction

Projects proposing new construction on Sites within the 1% floodplain or floodway must submit a site plan that clearly indicates all of the following:

- The FEMA determined elevation of the floodplain or floodway; and
- The elevation of the lowest floor level in the proposed buildings; and
- The location of the proposed buildings.

Buildings must be situated outside the floodplain and any Project contemplating additional federal resources will be required to subdivide the Project Site from the affected land or obtain a Conditional Letter of Map Amendment or Revision from FEMA demonstrating the Site is eligible for reclassification out of the floodplain.

# 2. Wetlands

The Application must include a U.S. Fish and Wildlife Service ("USFWS") National Wetlands Inventory map for the Project area with the boundary of all Sites clearly delineated.

USFWS wetlands inventory maps can be obtained from the USFWS website at <u>https://www.fws.gov/wetlands/data/mapper.html</u>.

If any portion of a Site contains wetlands, or if the Project may impact wetlands, the Application must include one of the following:

- A Letter of No Objection from the U.S. Army Corps of Engineers, or
- A wetlands permit from the U.S. Army Corps of Engineers

# 3. Mining

The Application must include an Illinois State Geological Survey ("ISGS") mining map for the Project area with the boundaries of all Sites clearly delineated.

ISGS mining maps can be obtained from the ISGS website at <u>https://prairie-</u> <u>research.maps.arcgis.com/apps/webappviewer/index.html?id=e38e9769e1c04ec29e41</u> dd5ba1c59bd7.

If any Site is in or near an area the ISGS identifies as affected by mining, the Application must include the following:

- The quadrangle study (if available) or the county mine map completed by the ISGS for the area in which the Site is located with the boundary of the Site clearly delineated; and
- Information indicating the depth of the mine, the type of mining that was performed, and the year that mining ceased; and
- An opinion from a qualified geotechnical engineer as to whether or not the Site will be impacted by the mining; and
- If the Site will be impacted by mining, evidence of the Project's ability to obtain mine subsidence insurance.

# 4. Seismic

The Application must include a seismic zone map for the Project area with the boundaries of all Sites clearly delineated.

Seismic zone maps may be obtained from the U.S. Geological Survey ("USGS") website at <u>https://earthquake.usgs.gov/earthquakes/map</u>

The map must identify any natural hazards located on, adjacent to, or nearby the site such as steep slopes, geological faults, or hazardous terrain features.

# J. Architectural Requirements

All Projects must meet the requirements contained in the Authority's Standards for Architectural Planning and Construction. The Standards for Architectural Planning and Construction are available on the Website.

#### 1. Architectural Standards, Universal Design, and Amenities Certification

The Application must include the Architectural Standards, Universal Design, and Amenities Certification signed by a licensed architect acting as the Project's Architect of Record. The Certification provides written confirmation of accessibility codes and Fair Housing Act requirements (if any) applicable to the Project. The Certification also provides written confirmation and identification of specific Project features which meet minimum code requirements.

#### a. Architectural Standards

All Projects must comply with the Authority's Standards for Architectural Planning and Construction (available on the Website).

# b. Universal Design

Universal Design, as defined by the Center of Universal Design, is "the design of products and environments to be usable by all people, to the greatest extent possible, without the need for adaptation or specialization." The Authority recognizes the need to create housing including Universal Design features while maintaining aesthetics and affordability.

The Authority views Universal Design not as a building code or standard, but rather as a set of features that should integrate seamlessly into the design of a dwelling unit, providing market appeal and possibility for residents to age in place. Whether applied to standard units or units designed under an accessibility code, the challenge of Universal Design is to produce as normal and appealing an outcome as possible.

Universal Design is not a safe harbor for other required accessibility codes but it should be utilized as a supplement to any code requirements. To truly award Projects willing to provide Universal Design elements above the code, the Authority requires each Application to first identify all code required elements and provide ten additional items not required by code in 100% of the units. As such, the Application must identify any and all Universal Design principles to be integrated into the unit design. Any Applications seeking an exception to this requirement must provide a detailed narrative discussing why Universal Design features cannot be provided. The Authority will review the submitted narrative and approve or deny it at its sole discretion.

#### c. Amenities

The Application must include Project amenities as specified in the Standards for Architectural Planning and Construction Section 7.00 – Design and Planning. In addition, a minimum of five (5) additional amenities selected from the list below must be incorporated in the Project and identified on Architectural Standards, Universal Design, and Amenities Certification; a minimum of three (3) of the five (5) shall be from First Priority categories.

The Authority encourages creativity and dual function design and, therefore, it is possible for a single amenity to qualify as more than one option in the following list.

Health and Safety	Community Spaces	Sustainability
First Priority	First Priority	First Priority
Free internet access per unit	Computer room equipped with one (1) computer for every three (3) units	All appliances in the unit meet the Energy Star rating
Residential studio units are 15% larger than the minimum requirement	Exercise / fitness center with at least one (1) machine per five (5) units	Dedicated recycling area within the Project
The project meets HUD's definition of smoke free housing	Garden plots / designated community garden area with a combined minimum of 200 square feet	Green Roof with available seating or other community activity area available on the roof
Washer and dryer in every unit	Secured bicycle parking (minimum of eight (8) slots per twenty five (25) units)	Upgraded landscaping, including one tree planted on-site for every ten units. 100% native and adaptive plantings / landscaping
Second Priority	Second Priority	Second Priority
Facility wide security camera system	An equipped sports court (e.g., volleyball, tennis, basketball, etc.)	On-site car sharing

Looped walking paths or connected sidewalks through the entire Project	At least one common room (e.g., community room, community kitchen, library, hair salon, billiards room, arts & crafts room, game room, dining room, etc.)	Screen doors on all exterior unit doors
Microwave oven in every unit	Outdoor entertainment space such as an outdoor theater and gazebo with	Trash and / or recycling disposal chutes or other refuse collection
Porch, patio, or balcony for each unit	available seating	system

# 2. Preliminary Architectural Plans and Specifications

The Application must include preliminary architectural plans and specifications that include all of the following:

- Cover sheet with Project title, development team, drawing index, building areas and code information; and
- Dimensioned floor plans, including square footage, for all unit and building types, with room designations and proposed finishes; and
- Typical wall sections; and
- Exterior elevations for all building types with material notations matching those defined within the scoping document discussed below; and

- A Site plan showing the placement and orientation of buildings, parking areas, sidewalks, easements, setbacks, trash dumpsters, buffers, storm water detention, required site amenities, and significant natural features; and
- Preliminary landscape plan; and
- Certification of Project Scope signed by the Architect and Sponsor.

The Certification of Project Scope must include a written description of the full Project scope. Items to be included, but not limited to, in this document are:

- Outline specifications indicating all materials selected and/or defined performance criteria (e.g., windows, doors, hardware, drywall, exterior materials, floor and wall finishes, etc.);
- Definition of structural systems to be modified/installed as part of the Project;
- Programmatic description of the proposed furniture, fixtures, and equipment items;
- Definition of the Project's sustainability strategy in the form of a certification checklist, energy model or detailed description of elements provided and their expected impact consistent with the level of points requested in the Application;
- Written description of HVAC system to be installed; and
- Definition of any/all other unique scoping items included in the Project.

# 3. Projects Involving Rehabilitation

All Projects involving any rehabilitation of existing structures must comply with the following requirements.

#### a. Physical Needs Assessment

The Application must include a Physical Needs Assessment ("PNA") completed according to the Authority's Standards for PNA and based on the existing conditions of the property.

#### b. Minimum Rehabilitation Standards

At a minimum, the proposed rehabilitation work must address all items identified as "Critical" or "Immediate" in the PNA.

Items identified in the PNA as five (5) to seven (7) year needs in current rehabilitation work may be completed as part of the current construction scope of work, or adequate reserves may be budgeted to ensure these items will be completed within timeframes identified in the PNA. The Application must include a detailed explanation of any and all construction cost variances existing between the development budget and PNA. The Authority reserves the right to modify the construction scope based on a review the explanation.

#### K. Historic Preservation Checklist

All Projects must meet the requirements of the National Historic Preservation Act and the Illinois State Historic Resources Protection Act as determined by the Illinois Historic Preservation Agency ("IHPA"). Note that this requirement is required by State Statute and applies to <u>ALL</u> Projects regardless of their Project type, location, or historic nature. The Application must include the Historic Preservation Checklist found on the Website and all required attachments OR an IHPA review letter specific to the Project and inclusive of all sites for multisite projects.

#### L. Construction Cost Breakdown

The Application must include:

- The Construction Cost Breakdown forms completed by a qualified contractor, Architect of Record, or construction cost consultant. Construction Cost Breakdown form is located in the Common Application, available on the Website.
- A detailed explanation of all construction cost variances existing between the Construction Cost Breakdown and Physical Needs Assessment ("PNA"), if applicable.

In cases where there is an Identity of Interest between a Sponsor and Project general contractor; between a Sponsor and the Project architect; or between the Project architect and Project general contractor; the Construction Cost Breakdown must be completed by an independent third-party construction cost estimation firm according to the Authority's Standards for Construction Cost Estimating available on the Website.

For rehabilitation Projects, Construction Cost Breakdown will be evaluated along with the PNA to ensure that all necessary items are addressed. If the scope of work is deemed insufficient by the Authority, the Application may fail the mandatory review.

#### M. Market Analysis

Because there are different levels of Site and Market Study / Market Analysis required by the various funding sources that could be used to fund a Permanent Supportive Housing development under this RFA, IHDA recommends that a Market Study that meets all published Site and Market Study Standards (available on the Website) be completed upon application. This method will leave the most funding options open to each applicant. However, in the interest of process simplification, IHDA also will allow the submittal of a Market Analysis Form with application. This form is published on the IHDA website and should be filled out by the applicant or a third party only. This form will satisfy the Market Analysis requirements of HOME, national Housing Trust Fund, and Illinois Affordable Housing Trust Fund sources only and Applicants choosing this path would only be eligible for these funding sources.

# N. Development Team Capacity

The Authority will evaluate the Development Team's capacity to successfully complete and manage the Project.

Applications must include the following for the Authority to evaluate the experience and capacity of the development team:

# 1. Development Team Certifications

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 may be found on the Website.

# 2. 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 Projects 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.
- 2. 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.
- 3. A Participant (including any affiliates) has declared bankruptcy over the past three (3) years.
- 4. A Participant (including any affiliates) has a mortgage default or arrearage of three months or more within the last three (3) years.
- 5. 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.
- 6. Any liens, judgements, or other claims exist against property owned by Owner (including any affiliates) for which the Owner has failed to resolve a public filing.
- 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.
- 8. A Participant that has materially misrepresented facts on any request for Authority resources.

# O. Financial Feasibility

All Applications must demonstrate that the Project is financially feasible. The following is a description of the areas, along with expected limits, which will be evaluated in order to determine financial feasibility.

# 1. Overall Limits

# a. General Contractor Fees

The general conditions, overhead, and profit in a general contractor's budget are limited to a combined fourteen percent (14%) of trade payments and Site work as calculated in the Authority's Common Application.

#### b. Architect and Civil Engineering Fees

Fees for architectural services and civil engineering are subject to the limits contained in the Authority's Standards for Architectural Planning and Construction, as amended and found on the Website.

#### c. Development Costs

The Authority will evaluate the acquisition and construction costs for reasonableness taking into consideration the project type, location, and scope of work based on the Authority's past experience with comparable projects and similar locations. All successful Applicants may be required to submit an appraisal prior to funding consideration by the Members of the Authority's Board.

#### d. Construction Contingency

Development budgets must include hard cost construction contingencies to cover unforeseen construction cost increases. The contingency **must** be sized as a percentage of the construction contract, as calculated in the Authority's Common Application, according to the following:

- New-Construction: 5%
- Rehabilitation (vacant residential, adaptive reuse, or modifications): 10%

#### e. Total Award

Up to \$9,000,000 or 90% of the total Project cost, whichever is less may be requested per Project; however, the amount of PSH Development Program funding to be allocated will not exceed the amount necessary to make the project financially feasible, as determined by the Authority.

#### f. Developer Fee

A Project's developer fee may not exceed the lesser of one million dollars (\$1,000,000) or twelve percent (12%) of the Project's total development cost net of the following: total developer fee, reserves, syndication costs, and interim costs, as calculated in the Common Application.

Developer fee includes all of the following which shall not appear elsewhere in the Project budget:

- Consultant fees
- Construction management fees
- Architectural and civil engineering fees in excess of the Authority's fee limits
- Developer overhead fees
- Any additional fees related to direct assistance provided to the Sponsor or Owner in conjunction with the completion of the Application or construction of the Project.

Developer fees are limited to the amount contemplated at the time of a conditional award. Developer fee will be paid by the Authority on the following schedule:

- 20% at initial closing
- 20% at 50% construction completion
- 40% at Certificate of Occupancy
- 20% at Final Closing

# 2. Project Income

#### a. Unit Rents

The proposed gross residential unit rents for the Project, including any utility allowances, must be reasonable for the market area and must not be in excess of ninety-five percent (95%) of any rent limits imposed by any committed or proposed financing source, program, or other requirement. Rent and income limits for 2022 may be found on the Authority's Website. Units with project based rental assistance may use the full value of the rental assistance for underwriting.

#### b. Rental Assistance

Any Project that includes residential income generated as a result of a rental or operating assistance contract must clearly identify the portion of the rent paid by the tenant. All assumptions regarding the funding and renewal of rental assistance contracts must be clearly identified. The Authority will review and determine the suitability of all assumptions regarding the funding and renewal of races by-case basis. In the event a rental assistance contract pays a rent in excess of 95% of the gross unit rent limit, the Application must demonstrate how the Project will remain financially feasible throughout the 30-year compliance period in the event the rental assistance contract is terminated.

#### c. Additional Residential Income

Additional sources of residential rental income are limited to laundry and vending income. Applications reflecting income from these sources must describe all assumptions regarding the calculation of this income.

#### d. Commercial Income

Applications that include any sources of commercial income must include a detailed description of any assumptions related to the commercial income and copies of any existing leases or letters of intent to occupy commercial space. The Authority will review and determine the suitability of all assumptions regarding commercial income on a case-by-case basis. Commercial income will be underwritten at a fifty percent (50%) vacancy rate. PSH Development Program funds may not be used to pay for construction or operation of commercial space, so these costs must be broken out separately in the development and operating budgets.

# 3. Utility Allowances

All Projects that include tenant-paid utilities must submit current documentation fully detailing the average per-unit utility expenses incurred by utility type on a monthly basis. The utility allowance must be appropriate for the unit size, utilities covered, and Project location.

Projects that include gas or electric heat must differentiate heating expenses from other gas and electric expenses. Non-essential utilities including telephone, cable television, internet access, etc., are excluded from the utility allowance.

Current utility allowance information **must** be provided by the governing public housing authority for the county where the Project is located or through the submission of a utility survey covering one (1) full year that is representative of each unit type within the Project.

# 4. Debt Service Coverage Ratio

Applications must demonstrate the Project can maintain a 15 year average minimum debt service coverage ratio (the ratio of a Project's net operating income to its total debt service) of 1.15, excluding cash flow notes.

Projects whose 15 year average debt service coverage ratio is less than 1.15 must capitalize operating or debt service reserves and detail how payouts from these reserves will maintain the minimum ratio through a cash flow statement reflecting annual payouts from the reserve.

# 5. Cash Flow

All Applications must demonstrate the Project can maintain a 15 year average annual cash flow (after debt service, if applicable) of at least \$100 per unit per year for a minimum of fifteen years.

# 6. Third Party Studies

Projects must budget \$20,000 to \$30,000 for third party studies. At the Authority's sole discretion, any or all of the following will be required: a construction cost estimate, environmental studies beyond a Phase I, a cost certification, and such other third-party studies as the Authority may require. All Projects will require a Market Study at application, a Phase 1 Environmental Assessment between award and closing, and an appraisal between award and closing.

# 7. Environmental Remediation

If it is expected that a Project Site(s) will require remediation, the development budget must include both an environmental remediation line item to cover the scope of the remediation, and an environmental remediation contingency line item in the amount of ten percent (10%) of the remediation costs.

# 8. Reserves

The Authority will review the Project's reserves to determine its long-term viability. Project reserves must be reflected in the Application and a narrative must be provided to explain assumptions regarding the calculation of the following:

# a. Replacement Reserves

All Applications must capitalize a replacement reserve of \$1,500 per unit in the development budget and fund ongoing annual replacement reserve contributions of \$450 per unit from operations, which shall trend up at three percent (3%) per annum.

#### b. Real Estate Tax Reserves

All Applications must capitalize a real estate tax reserve to pay real estate taxes during the construction period plus an amount equal to fifty-five percent (55%) of the estimated annual real estate taxes in the first year of Project operations. Additionally, the operating pro forma must include the anticipated annual real estate tax expense.

All Applications must include evidence of how construction period real estate taxes and operations period real estate taxes were determined.

All Applications assuming a real estate tax abatement for any period of time must submit an attorney opinion letter which details any assumptions associated with the abatement including all of the following: the calculation of real estate taxes before, during, and after the abatement; and the anticipated date the abatement becomes effective; and the length of the abatement.

#### c. Insurance Reserves

All Applications must budget an adequate insurance reserve to pay insurance during the construction period plus an amount equal to one hundred five percent (105%) of the estimated annual insurance expenses in the first year of Project operations. Additionally, the operating pro forma must include the anticipated annual insurance expense.

#### d. Operating Reserves

All Applications must include an operating reserve sufficient to cover all Project operational costs including administrative, management, payroll, maintenance, utilities, taxes, insurance, and debt service payment for at least six (6) months.

#### e. Other Reserves

The Authority will review all other Project reserves including, but not limited to, marketing/leasing, debt service, operating, and furniture, fixtures and equipment to evaluate

their sufficiency and reasonableness. Projects including these reserves must also include a description with all of the following:

- 1. How the Project will benefit from the reserves;
- 2. Why the reserves are necessary;
- 3. Who (if anyone) is requiring them;
- 4. Who will hold them;
- 5. What is the process for releasing the reserves;
- 6. Is there a requirement the reserves be replenished; and
- 7. If there is a requirement that reserves be replenished, what is the source of funds for replenishment.

The Authority does not allow supportive service reserves to be funded through this RFA. Supportive service reserves may be reflected in the development budget if capitalized by another source.

# 9. Operating Expenses

Annual per unit operating expenses must be adequate and reasonable for the Project type, location, and population served.

Per unit annual operating expenses, excluding taxes, reserves, resident services, and debt service, as calculated by the Common Application, are expected to fall within the ranges found on the Website by Project type and Set-Aside.

In order to substantiate a deviation from the expected ranges the Application must include supplemental documentation with additional detail about specific expenses. The Authority will review and determine the suitability of operating expenses outside of expected ranges on a case-by-case basis.

Projects under this RFA shall not request a property management fee above 7% of gross income.

# 10. Trending Factors

The Project must demonstrate it remains financially feasible for a minimum of fifteen (15) years utilizing the following cash flow trending factors:

• Annual Increase in real estate taxes: 4%

- Annual Increase in operating expenses: 3%
- Annual Increase in income: 2%

In order to substantiate a deviation from the listed trending factors, the Application must include supplemental documentation such as an approved real estate tax abatement. The Authority will review and determine the suitability of trending factors outside the expected ranges on a case-by-case basis.

# **11. Residential Vacancy Rates**

The Project must demonstrate it remains financially feasible for a minimum of fifteen (15) years utilizing an annual economic vacancy rate for the residential portion of the Project of 10%.

In order to substantiate a deviation from the required vacancy rate, the Application must include supplemental documentation. The Authority will review and determine the suitability of any other vacancy rates on a case-by-case basis.

# 12. Evidence of Project Financing

All Applications must reflect adequate sources of financing in order to complete the Project, including any contemplated grant or loan financing from the Authority. Any Application that does not reflect adequate sources will fail the mandatory review.

All Applications must evidence all Project financing sources including debt, grants, and tax credit equity through executed acknowledgment letter(s) from all lender(s) and/or grantor(s). Each acknowledgment letter must contain evidence that, as of the Application deadline date, the Application is either still under consideration or has been approved.

If, during the Authority's review of the Application, the Applicant is notified that another Project financing source has been denied, the Applicant will be allowed fourteen (14) business days from the date of the denial notice to provide a revised financing plan. If not provided, the Application will be determined to be financially infeasible and will fail the mandatory review.

All Applications must demonstrate that Project underwriting is in compliance with the requirements associated with all Project financing sources.

#### a. Debt Sources

For any debt source, the executed acknowledgment letter(s) must contain the following terms:

- 1. The amount of the loan,
- 2. The length of the loan term, which must be at least fifteen (15) years,
- 3. The amortization period of the loan,
- 4. The interest rate (and any terms and conditions regarding adjustments),
- 5. The expected monthly or annual debt service payment, and
- 6. Any financing fees associated with the debt source.

If debt financing is to be obtained through a mortgage broker or banker, the executed acknowledgment letter must be from the actual lender.

#### b. Grant Sources

For any grant source, the executed acknowledgment letter(s) must contain the amount of the grant, when the grant will be available as a source to the Project, and any outstanding requirements to be met prior to grant availability.

#### c. Tax Credit Equity Sources

For any tax credit equity source, the executed acknowledgment letter(s) must contain the amount of tax credit equity available to the Project, the proposed net cent rate per tax credit dollar, and the proposed equity pay-in schedule.

Category	Points	Category Weight
Leveraging Other Sources of Funding	15	15%
Firm Commitment of Operating or Rental Assistance	20	20%
Universal Design Beyond Code Requirements	10	10%
Green Design and Energy Efficiency	10	10%
Access to Transportation	10	10%
Coordination with DCFS	5	5%
Coordination with IDOC	5	5%
Coordination with DHS for IDD	5	5%
Coordination of Services (with community-based provider)	5	5%
Neighborhood Assets	10	10%
Development Team Characteristics	5	5%
Totals	100	100%

# Section 4: Application Scoring Criteria

Projects that pass all mandatory application requirements will be scored on the following items and ranked according to total score. Points will be awarded based solely on the information submitted in the Application. The Authority reserves the right to verify information submitted in the Application.

The Authority may deny points if the correct forms or required information for each scoring category are not submitted, or if information available to the Authority negates a claim for points. The Applicant's commitment to various scoring criteria shall, at the sole discretion of the Authority, be binding and shall be incorporated into a Regulatory Agreement. All Applications must include a completed Permanent Supportive Housing Development Program Self Scoring Form which is available on the Website.

# A. Leveraging Other Capital Funding Sources

Projects that leverage Authority resources will be awarded up to fifteen (15) points based on the amount of leveraged resources as a percentage of total funding sources in the Project's development budget.

Leveraged resources under this category are defined as funds provided by a non-Authority source. Leveraged resources do not include deferred developer fees; the equity generated from the sale of Authority-allocated Illinois Affordable Housing Tax Credits (also known as state donation tax credits); equity bridge loans; or any non-market rate Authority-administered sources, such as HOME funds or Affordable Housing Trust Funds.

All leveraged resources must be reflected in the Project budget and be available during the

Project's construction period to pay for expenses reflected in the development budget. Only sources allocated to uses that fall within the Project's Site boundaries will be considered for financial leveraging.

In Projects where the leveraged resource is a contribution of direct financial assistance from an area employer that is otherwise not participating in the development of the Project, the assistance must be in the form of an unsecured loan giving no foreclosure rights to the employer or a grant giving no recapture rights to the employer.

In Projects where the acquisition is financed in whole or in part through a seller's note, the amount of the seller's financing will not be considered a leveraged resource under this category. At its sole discretion the Authority may allow seller's notes from health and hospital systems to qualify for points under this category.

Projects will be awarded points based on the following criteria:

Leveraged Resources as Percentage of Total Project Costs	Points
20.1% or more	15
15.1-20%	10
12-15%	6

# B. Firm Commitment of Operating or Rental Assistance

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. Rental assistance will be considered project-based if it is tied to the units rather than to the tenants. Points will only be awarded if the rental assistance ensures tenants pay no more than thirty (30%) percent of their income toward rent and utility expenses combined.

Sponsors seeking points in this category must submit documentation evidencing a current rental assistance contract or a commitment to provide rental assistance. Projects with a current rental assistance contract must submit a copy of the fully executed contract in the Application.

Projects with a rental assistance commitment must provide a commitment letter in the

Application that includes all of the following: a) the maximum household income; b) the total number of units assisted; and c) the length of the rental assistance contract.

When the U.S. Department of Housing and Urban Development (HUD) is providing the rental assistance, the commitment letter must be from HUD. Illinois Division of Mental Health Bridge Subsidy Program commitment letters must be from the Illinois Department of Human Services or the Illinois Division of Mental Health, and Project Based Housing Choice Voucher Conversion and Public Housing Authority

Annual Contribution Contracts must be from the executive director of the relevant Public Housing Authority. Developer-funded rental assistance is not eligible for points under this category. However, rental assistance from a Health and Hospital System may at the Authority's sole discretion be eligible under this category, even if the Health and Hospital System is the Sponsor or part of the sponsorship entity.

The Authority understands the Continua of Care (CoC) that are recipients of Hearth Act funding (formerly known as McKinney Vento) are unable to commit rental assistance for periods of five (5) years or longer. In recognition of this, and the Authority having a desire to work more closely with the CoCs of Illinois, points have been added in this RFA for rental assistance funded by CoCs which may not meet the Authority's traditional requirement that Rental Assistance Contracts be for a minimum of five (5) years.

For Projects with a Rental Assistance Contract points will be awarded as follows:

Percentage of Units Assisted	Points for 10+ Year Commitment	Points for 5 Year to 9 Year and 11 Month Commitment	Points for CoC funded Rental Assistance
75.1% or more units	20	10	7
50.1-75% of units	15	7	5
10.1-50% of units	10	5	3
1-10% of units	5	3	1

# C. Universal Design

Projects identifying Universal Design elements to be provided within the architectural design in excess of code required Universal Design features plus ten additional items defined in the Mandatory Section, as evidenced through submission of the Architectural Standards, Universal Design and Amenities Certification available on the Website, may earn up to ten (10) points as follows:

Universal Design Features Beyond Code Requirements	
Projects that select ten (10) additional Universal Design items beyond code requirements and beyond Mandatory requirements (for a total of 20 items) in 100% of units	10

#### D. Green Design and Energy Efficiency

Projects whose architectural design and construction meet or exceed energy efficiency and green criteria may earn up to ten (10) points in the application by certifying to the following standards:

Two Points (2)	Three Points (3)	Six Points (6)	Eight Points (8)	Ten Points (10)
Net zero energy ready AND	LEED v.4 Certified OR	LEED v.4 Silver or Gold (HERS ~50s)	LEED v.4 Platinum	Living Building Challenge Certification (Living Future Institute)
HERS score 85 or lower	NGBS Bronze OR	NGBS Silver or Gold	NGBS Emerald	Passive Housing Institute US (PHIUS) + 2015 Project Certificatio (HERS ~30s)
	Meet all mandatory Enterprise criteria OR	Energy Star Certification (HERS 55-75)	Enterprise 2020 Community Certification	Net Zero Energy Certification (Livin Future Institute)

#### E. Access to Transportation

Projects may earn up to ten (10) points for access to transportation. *Points in this category are cumulative.* 

Projects will be awarded five (5) points for transit-oriented development if the proposed Project is located in close proximity to fixed-route public transportation, excluding inter-city transportation. "Close proximity" is defined as being within a half (.5) mile radius. Transportation routes and distance to the Project Site must be identified on a map submitted with the Application along with a current schedule for the routes being considered.

Projects will be awarded five (5) points if served by publicly available Dial-A-Ride modes of transportation that are at a minimum available between Monday and Friday from 8:00 a.m. to 5:00 p.m. The Applicant must include a letter from the Dial-A-Ride provider stating all of the following:

- 1. The Project is located within the service area of the Dial-A-Ride; and
- 2. The Dial-A-Ride service is, at a minimum, available between the hours of 8:00 a.m. and 5:00 p.m. Monday through Friday.

# F. Coordination with the Illinois Department of Children and Family Services (DCFS) or a Grantee of the Illinois Department of Children and Family Services to House Youth Aging out of DCFS Care

In Illinois, youth generally age out of DCFS systems at age 21 and many need a range of supportive housing interventions. All persons housed under this RFA must be of legal age to rent an apartment, although having co-signers of leases is acceptable, as is a master lease model, so long as the tenants are all at least 18 years of age. Housing may not be time limited and there can be no age restrictions on the housing but a preference for the intended population must be appropriately referenced in the Tenant Selection Plan. Projects may earn points under this category as follows:

Points	Scoring Threshold
3.5	Letter of support from DCFS funded organization willing to make referrals to the housing
5	Letter of support from DCFS funded organization willing to make referrals to the housing -AND- a plan for how services will be delivered once the youth has graduated from DCFS funded services

# G. Coordination with Illinois Department of Corrections (IDOC) Re-Entry program

Projects providing housing which is coordinated with IDOC may earn up to five (5) points as follows:

Points	Scoring Threshold
3.5	Coordination with IDOC
5	Coordination with IDOC
	-AND- commitment of social services to further individual post-release plans

Evidenced through submission of all the following:

- 1. Written confirmation from IDOC:
  - a. How coordination will occur with Project; and
  - b. What services are provided; and
  - c. What funding source is used to pay for these services; and
  - d. The capacity of the organization to provide services to any Project tenants.

A preference for the intended population must be appropriately referenced in the Tenant Selection Plan. Applications for Projects that are unable to obtain written confirmation from IDOC but have made efforts to obtain such written confirmation should include a description of the efforts used to obtain referrals for the Project. The Authority will review the documentation and may award points to Projects that have made best efforts.

# H. Coordination with Illinois Department of Human Services, Division of Developmental Disabilities

Projects providing housing which is coordinated with DHS and/or a DHS funded Independent Service Coordination agency or other DHS funded organization for adults with Intellectual or Development Disabilities may earn up to 5 points as follows:

Points	Scoring Threshold
3.5	Coordination with DHS, DHS-funded Independent Service Coordination agency or other DHS funded organization
5	Coordination with DHS, DHS-funded Independent Service Coordination agency or other DHS funded organization -AND- commitment of social services to support individual Personal Plans

A preference for the intended population must be appropriately referenced in the Tenant Selection Plan. Applications for Projects that are unable to obtain written confirmation from DHS but have made efforts to obtain such written confirmation should include a description of the efforts used to obtain referrals for the Project. The Authority will review the documentation and may award points to Projects that have made best efforts.

# I. Coordination of Services

Projects that establish a Memorandum of Understanding (MOU) or other legally binding agreement with a community-based service provider, which may or may not be the Sponsor organization, to provide support services on-site in a dedicated space may earn five (5) points. Projects must submit the MOU and a service plan that outlines the services offered to residents, number of proposed staff, and the size and location of the service office. Services at minimum must include case management, tenancy support services, and access to behavioral health services (which includes substance use and mental health services).

# J. Neighborhood Assets

Up to ten (10) points may be awarded in this section based on the proximity of neighborhood assets to the Project Site. Proximity thresholds are based on Geographic Set-Aside (see Section 1: Definitions).

Points will be awarded for each asset in excess of the two (2) neighborhood assets as follows:

Proximity Radius by Set-Aside		
City of Chicago	.25 miles	
Chicago Metro	.5 miles	
Other Metro	.75 miles	
Non-Metro	1 mile	

Category	Points
Health Services	4
Food Access	2
Civic/Recreation	2
Education/Job Training	2

Only one establishment will count for each category. For example, a community college and a job training center are each Education / Job Training establishments. The applicant may only take points for one asset. Conversely, a large grocery store with a pharmacy may score under both Health Services and Food Access.

The two (2) neighborhood assets/establishments used to meet the Mandatory requirement in Section 3 E will be excluded from the scoring under this section. Additional neighborhood assets, above the two (2) utilized to meet the Mandatory requirement, can be considered for scoring under this section.

Assets must meet the following threshold criteria:

**Health Services** 

• All sites are located within the proximity radius of a county health clinic, urgent care clinic, pharmacy, federally qualified health center, or hospital system.

Food Access

• All sites are located within proximity radius of a supermarket, supercenter, full-service grocery store or other food store with produce.

#### Civic / Recreation

• All sites are located within the proximity radius of a public library, public park / park district territory that is open to the public.

#### Job Training

- All sites are located within the proximity radius of a workforce investment center or job training center.
- Please review the Economic Development Resource Directory guide on the Authority's Website for a list of approved centers.

#### Education

• All sites are located within the proximity radius of a public K-12 school, community college, or continuing education facility offering a full set of classes. Tuition based schools and selective enrollment schools do not qualify.

Assets must be evidenced through submission of all of the following:

- 1) Map(s) clearly delineating all Sites and distance to the neighborhood asset(s).
- 2) The applicable proximity radius around the Site.
- 3) A table referencing each neighborhood asset identified on the map(s).

Documents provided to meet this criteria can also be used to meet the Mandatory requirement in Section 3 E.

#### K. Development Team Characteristics

Projects whose Participants are certified as Minorities, Females, and/or Persons with Disabilities may earn up to five (5) points.

Points	Scoring Threshold
3	One Participant of the development team is appropriately certified
5	Two or more Participants of the development team are appropriately certified

Current certification(s) from one or more of the following entities must be provided as evidence: City of Chicago, IL; Chicago Minority Supplier Development Council; Chicago Transit Authority; Cook County, IL; Illinois Department of Central Management Services – Business Enterprise Program for Minorities, Females, and Persons with Disabilities; Illinois Department of Transportation; Metra; Mid-States Minority Supplier Development Council; Pace Suburban Bus; City of St. Louis, MO; or Women's Business Development Center.

# **Section Five: Post-Award Requirements**

If the Members of the Authority approve the Application, a conditional commitment letter ("Commitment") will be issued to the Applicant specifying the terms and conditions upon which the Authority will award and fund the Project. If the Applicant does not satisfy the terms and conditions of the Commitment in the Authority's sole and absolute discretion within the time frame specified therein the funds will not be awarded and will be withdrawn. If the Applicant satisfies the terms and conditions of the Commitment in the Authority's sole and absolute discretion within the time frame specified therein the funds will be awarded as provided in the Commitment.

Among the requirements in the Commitment will be signature and delivery by the Applicant of the following documents to be provided by the Authority, including without limitation:

(i) Funding Agreement, (ii) Regulatory Agreement, (iii) Recapture Agreement, and in cases where national Housing Trust Fund is the source of funds, (iv) a certification that the Sponsor shall comply with all national Housing Trust Fund Regulations.

Aside from certain costs associated with preparing a successful Application (for example, physical needs assessments), no Project costs may be incurred prior to closing of the award and funding of the Project. Closing shall be at such time as the applicant satisfies the terms and conditions of the Commitment as determined by the Authority in its sole and absolute discretion.

Applicants must agree to comply with all applicable federal and State of Illinois requirements. Such requirements may have significant impact on the costs and complexity of the Project.

Applicants are expected to be familiar with the full range of all legal and statutory compliance requirements applicable to the funds awarded and to obtain all necessary information and advice so that they can comply with such requirements. The following is a non-exhaustive summary of certain aspects of the major compliance requirements.

# A. Approval of Final Plans and Specifications

The Authority's Architectural & Construction Services Department must approve the complete final architectural plans and specifications for the Project. The complete plans and specifications must incorporate all mandatory requirements as well as any scoring criteria for which the Project received points. In addition to the Project plans and specifications, the following documents will be required:

- A copy of the Illinois Architectural Registration Certificate for the design firm and/or the sole proprietor; and
- An Architect's Error and Omissions Certificate of Insurance; and
- The ALTA/ACSM Land Title Survey; and
- If determined by the Authority to be applicable, a soils boring report describing the subsurface exploration, analysis relative to mining hazards, and geotechnical recommendations for the Site or a Site-specific certified letter from the architect regarding the suitability of soils.

#### B. Environmental Assessment

Unless federal funds are present, the Authority will determine in its sole discretion the scope of the environmental studies and, if applicable, the scope of remediation that may be required for one or more of the Projects. If a Project Site(s) will require remediation, the development budget must include both an environmental remediation line item to cover the scope of the remediation and an environmental remediation contingency line item in the amount of ten percent (10%) of the remediation costs.

If federal funds are awarded, a determination will be made as to whether an environmental clearance from HUD will be required. If such clearance is required, the Applicant may not undertake, or commit any funds to, physical or choice-limiting actions, including property acquisition, demolition, tenant relocation, rehabilitation, conversion, repair, or construction prior to receipt of environmental clearance from HUD.

# C. Excluded Parties

The Excluded Parties List System (EPLS) includes information regarding entities that have been debarred, suspended, proposed for debarment, excluded, or disqualified under the non-procurement common rule, or otherwise declared ineligible from receiving federal contracts, certain subcontracts, and certain

federal assistance and benefits. The Authority will check all names of all Participants against the EPLS found at <u>www.epls.gov</u>. The Authority may rescind a conditional approval of a funding award if a Participant appears on EPLS.

#### D. Labor Standards

The Authority will implement labor standards on demolition, construction, and rehabilitation Projects. In instances when a Project utilizes only non-federal funds, the Authority must ensure the Project abides by the Illinois Prevailing Wage Act (820 ILCS 130/0/.01). In instances where the Project utilizes federal funds from the Authority, the Authority must ensure the Project complies with Davis Bacon and Related Acts (DBRA). Federal Regulations can be found in part from the Code of Federal Regulations (Title 29 CFR, parts 1,3,5,6 and 7). If a loan or grant from another source requires a Project to comply with the Davis-Bacon Act, 40 USC 276a et seq., the requirements of the other source will prevail.

#### E. Fair Housing

Fair housing is otherwise known as equal housing opportunity. Federal, state, and various local laws legally define fair housing and identify specific protected classes based on documentation of past patterns of discrimination.

# 1. Fair Housing Act of 1968 as amended in 1988 ("Fair Housing Act")

Title VIII of the Civil Rights Act of 1968, also known as the Fair Housing Act, prohibits discrimination based on race, color, religion, national origin, sex, familial status, or disability and requires landlords to make reasonable accommodations and modifications for tenants with disabilities.

The Fair Housing Act requires the Secretary of HUD to administer housing and development programs and activities that "affirmatively further" (actively support and encourage) fair housing. Participants must undertake specific activities to affirmatively further equal opportunity and fair housing and must assure all activities and services are accessible to persons with disabilities.

# 2. Section 504 of the Rehabilitation Act of 1973 ("Section 504")

Section 504 prohibits discrimination in federally funded programs. For a federally assisted new construction housing Project, Section 504 requires five percent (5%) of the dwelling units, or at least one unit, whichever is greater, to meet Uniform Federal Accessibility Standards (UFAS) or a standard that is equivalent or stricter, for persons with mobility disabilities. An additional two percent (2%) of the dwelling units, or at least one unit, whichever is greater, must be accessible for persons with hearing or visual disabilities.

For federally financed housing rehabilitation Projects that result in substantial alteration, the new construction provisions of 24 CFR 8.22 (equivalent to that described above) will apply. Alterations are considered substantial if they are undertaken to a property that has fifteen (15) or more units and the cost of the alterations is 75% or more of the replacement cost of the completed facility.

If the subject property has fewer than fifteen (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 project accessible to and usable by individuals with disabilities, then the requirements of 24 CFR 8.23(b) - Other Alterations apply.

# 3. The Americans with Disabilities Act of 1990 ("ADA")

The ADA prohibits discrimination on the basis of disability in government-funded programs, including housing programs (Title II), as well as public accommodations (Title III) which means that rental offices, homeless shelters, and other on-site business locations used by the public, including common areas of public/assisted housing, must be accessible to persons with disabilities.

# 4. Olmstead v. L.C., 527 U.S. 581 (1999)

Olmstead v. L.C. found that persons with disabilities have a right to receive their services in the most integrated setting according to their needs and desires. The following Guidance on

Olmstead and how it relates to housing has been released by HUD and the U.S. Department of Justice:

http://portal.hud.gov/hudportal/documents/huddoc?id=OlmsteadGuidnc060413.pdf

http://www.ada.gov/olmstead/q&a\_olmstead.htm

# 5. Illinois Human Rights Act

The Illinois Human Rights Act provides equal access to residential housing choices regardless of race, color, religion, national origin, sex, familial status, disability, pregnancy, marital status, age (40 and over), order of protection status, ancestry, military status, unfavorable military discharge, and sexual orientation (including gender-related identity).

# F. Section 3 and Minority- and Women-Owned Business Enterprises

Projects will comply with Section 3 of the Housing and Urban Development Act of 1968 if an awarded loan or grant from a funding source triggers such requirement. In addition, hiring practices shall comply with any applicable Illinois or Federal requirements, including but not limited to the Business Enterprise for Minorities, Females, and Persons with Disabilities Act (30 ILCS 575).

# G. Management Documents

All Projects will prepare a tenant selection plan, management plan, management agreement, affirmative fair housing marketing plan, and sample lease to be reviewed and approved by the Authority. At the Authority's discretion, some Projects may be required to provide a marketing plan and marketing agreement, and, if the Project involves the acquisition of existing condominiums or homes, a plan to engage and gain the support of any existing condominium or homeowner associations.

# H. Regulatory Period

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.

# I. Reporting and Monitoring

The Authority will assess property and unit condition, compliance with affordability and targeting requirements, and financial stability through submission of audits.