

Draft HOME-ARP Allocation Plan for Public Comment

Participating Jurisdiction: State of Illinois (Non-Entitlement)

Date:

References to “the ARP” mean the HOME-ARP statute at section 3205 of the American Rescue Plan Act of 2021 (P.L. 117-2).

Consultation

In accordance with Section V.A of the Notice (page 13), before developing its HOME-ARP allocation plan, at a minimum, a PJ must consult with:

- CoC(s) serving the jurisdiction’s geographic area,
- homeless service providers,
- domestic violence service providers,
- veterans’ groups,
- public housing agencies (PHAs),
- public agencies that address the needs of the qualifying populations, and
- public or private organizations that address fair housing, civil rights, and the needs of persons with disabilities.

State PJs are not required to consult with every PHA or CoC within the state’s boundaries; however, local PJs must consult with all PHAs (including statewide or regional PHAs) and CoCs serving the jurisdiction.

Describe the consultation process including methods used and dates of consultation:

The work to prevent and end homelessness in Illinois requires comprehensive and localized strategies. As the recipient of Illinois’ statewide non-entitlement HOME-ARP allocation, IHDA conducted statewide outreach to a wide range of entities to determine the varied and unique housing needs of the residents of Illinois. This outreach included:

- Continua of Care in Illinois
- Housing and Housing-Related Service Providers
- Public Housing Authorities
- Fair Housing, Policy, and Advocacy Organizations
- Regional Economic Development Organizations
- Illinois Participating Jurisdictions
- State Agencies

Altogether, IHDA received feedback from 71 different entities on needs and recommendations for statewide HOME-ARP funding. Outreach and feedback were conducted via email, phone, meetings, and advocacy letters sent to IHDA. Details on the feedback received from each entity is as follows.

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List the organizations consulted: Continua of Care in Illinois (Outreach Method 1)

Agency/Org Consulted	Type of Agency/Org	Method of Consultation	Feedback
Northwestern Continuum of Care	Continuum of Care	Listening session with the Illinois Department of Human Services on Dec. 6, 2021	<p>Priorities:</p> <ul style="list-style-type: none"> • Create more permanent supportive housing opportunity to folks who have long term barriers • Increasing the housing stock in communities for safe and affordable housing – inspect rental housing to ensure it is safe and decent • Prevent homelessness through diversion programs • Create more new affordable housing – look at different models like tiny houses to get more units • More outreach fundings and mental health programming to reach chronically homeless • Streamline funding and programs between state agencies
Suburban Cook County Continuum of Care	Continuum of Care	Listening session with the Illinois Department of Human Services on Dec. 13, 2021	<p>Priorities:</p> <ul style="list-style-type: none"> • Shelter space to replace shelters lost during COVID – permanent shelters with wrap-around services • More permanent supportive housing • Increase housing stock, find more landlords willing to work with state funding • Make programs more accessible and increase outreach to communities where people are at risk of homelessness – especially for youth in suburbs • Help with transportation and access to services, access to obtaining a state ID • More support providing long-term counseling and care to ensure people do not return to homelessness • Enact rent control to prevent evictions • Better coordination with people leaving the justice system to find immediate housing • Prioritize people leaving domestic violence, because they often cannot stay with friends or family out of safety concerns • Make sure funding for programs is distributed around the state and not clustered in certain areas • Creative housing solutions like shared housing and tiny homes
City of Chicago Continuum of Care	Continuum of Care	Listening sessions with the Illinois Department of Human Services on Dec. 13, 2021 and Dec. 16, 2021	<p>Priorities:</p> <ul style="list-style-type: none"> • Centralize list of people looking for housing so providers can find them • Permanent supportive housing • More shelter access outside of Chicago • Mental health services • Continue temporary housing / hotel stay programs • Shelters do not help people leave homelessness – you need interim housing • Easier access to housing vouchers • Family sized affordable housing units • More affordable housing development and preservation • Address policy issues like rent control and eviction prevention • Housing options for medical respite • Create “care teams” that address housing, mental and physical health care, employment, and more
Will County Continuum of Care	Continuum of Care	Listening session with the Illinois	<p>Priorities:</p>

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		Department of Human Services on Dec. 14, 2021	<ul style="list-style-type: none"> • Available units to place clients – finding landlords to accept clients • Develop more affordable housing units • Funding for support services alongside affordable housing • More fair housing training and enforcement • Transportation in rural areas to connect people with jobs and services • Mental health services • Shelter space available to people of all backgrounds • Emergency housing vouchers, TBRA • Streamline services or hire caseworkers to help people get all their resources in one place • Better coordinate the State Referral Network among state agencies to improve outcomes • More robust diversion and harm reduction programs to keep people out of homelessness
Du Page County Continuum of Care	Continuum of Care	Listening session for this region was combined with the listening session with the Will County Continuum of Care on Dec. 14, 2021	See: Will County Continuum of Care
Continuum of Care for Kane County	Continuum of Care	Listening session for this region was combined with the listening session with the Will County Continuum of Care on Dec. 14, 2021	See: Will County Continuum of Care
Peoria Area Homeless Consortium (Home for All CoC)	Continuum of Care		<p>Priorities:</p> <ul style="list-style-type: none"> • Additional capacity of supportive and transitional housing • Focus on prevention side of homelessness • More unit availability – tiny homes as an option • More permanent supportive housing • Improve the Statewide Referral Network to improve connections between tenants and available housing • More affordable housing in safer and more expensive neighborhoods • Inspections of units where people are being placed to ensure they are livable • More affordable housing, such as tiny home communities • Better access to healthcare and mental health services – both coverage for care and transportation
Urbana/Champaign Continuum of Care	Continuum of Care	Listening session with the Illinois Department of Human Services on Dec. 9, 2021	<p>Priorities:</p> <ul style="list-style-type: none"> • Available affordable housing units • More seamless partnerships with agencies that offer services like health and substance abuse • More shelter space, a women’s shelter • Easier access to resources for people experiencing homelessness – fewer ID and paperwork requirements
West Central Illinois Continuum of Care	Continuum of Care	Listening session with the Illinois	Priorities:

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		Department of Human Services on Dec. 9, 2021	<ul style="list-style-type: none"> • Better wrap-around services for people in shelters, with less paperwork and red tape • Housing options for people with criminal history and on sex offender registry • More coordination between State and CoCs • Support for mental health and substance abuse • Expand supportive housing and rapid housing • Homelessness diversion and prevention programs
Heartland Continuum of Care (Sangamon County)	Continuum of Care	Listening session for this region was combined with the listening session with the West Central Illinois Continuum of Care on Dec. 9, 2021	See: West Central Illinois Continuum of Care
Homeless Action Council Continuum of Care (St. Clair County)	Continuum of Care	Listening session with the Illinois Department of Human Services on Dec. 8, 2021	<p>Priorities:</p> <ul style="list-style-type: none"> • More shelter space • Huge issues with mental illness and domestic violence • More affordable housing for extremely low-income households • Temporary housing for people receiving case management • Longer-term temporary shelter with privacy for residents – non-congregate shelter
South-Central Illinois Continuum of Care	Continuum of Care	Listening session with the Illinois Department of Human Services on Dec. 8, 2021	<p>Priorities:</p> <ul style="list-style-type: none"> • More consistent state funding for services and programming, e.g. for mental health • Re-entry support for those leaving institutions • More prevention models before it gets to eviction and homeless • Make it easier for people to access services – streamlined agencies, single location to access multiple services • Rural-focused services are needed – better transportation, access to jobs, services that don't require internet
Southern Illinois Continuum of Care	Continuum of Care	Listening session with the Illinois Department of Human Services on Dec. 8, 2021	<p>Priorities:</p> <ul style="list-style-type: none"> • Housing support for veterans and people with criminal records • More shelter capacity – severe need • More available affordable housing and landlords that will work with service providers • Affordable housing for people with disabilities, to keep them out of nursing homes • Rural transportation and employment access

Summarize feedback received and results of upfront consultation with these entities:

In December 2021, the Illinois Department of Human Services (IDHS) conducted a series of listening sessions with each Continuum of Care across the State to gather input for the Illinois Plan to End Homelessness. IDHS and IHDA regularly work in partnership to address statewide housing needs and priorities. IDHS shared the full notes and transcripts from these listening sessions with IHDA to help IHDA determine the CoCs perspectives on persistent needs and top priorities for around homelessness in Illinois, to help guide CoC input for statewide HOME-ARP funds.

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The outreach illuminated several key themes and highest priority needs from CoCs of different sizes and across geographies. The eight key needs in the work to end homelessness, reiterated by multiple CoCs, are:

- More shelter capacity, especially non-congregate and long-term shelter space
- More affordable housing development, especially permanent supportive housing
- Better quality affordable housing and more oversight of landlords providing housing to ensure quality and livability
- Shelter and housing for people with criminal records or who are leaving the justice system
- Family-sized affordable housing units (2+ bedrooms)
- Creative solutions to build more housing units, such as tiny home communities
- More supportive service programming, especially for mental health, addiction and substance abuse support, and administrative assistance with tasks such as obtaining a government identification
- More homelessness prevention services, better access to employment and transit—especially in rural areas—to prevent homelessness

List the organizations consulted: Continua of Care (Outreach Method 2)

Agency/Org Consulted	Type of Agency/Org	Method of Consultation	Feedback
Healthcare Alternative Systems, Inc.	Behavioral care and social service agency based in Chicago, IL	Email survey	<p>Community gaps:</p> <ul style="list-style-type: none"> • The lack of Recovery Home services for women and Recovery Home services for Women with Children • Adult males with backgrounds have a harder time finding housing opportunities. • The lack of services for Spanish Speaking Individuals and those individuals who are undocumented • The HUD flow chart keeps a lot of people from being housed because they don't meet the definition of chronic homelessness. <p>Advice on state HOME-ARP funds:</p> <ul style="list-style-type: none"> • Development of Affordable Rental Housing: 25% • Acquisition/Development of Non-Congregate Shelter Units: 25% • Tenant-Based Rental Assistance: 0% • Supportive Services [transitional housing, housing counseling, and homeless prevention services]: 50%
DuPage County Continuum of Care	Continuum of Care	Email survey	<p>Community gaps:</p> <ul style="list-style-type: none"> • Rental Housing: Affordable rental housing for persons that meet the qualifying population. • TBRA: Assistance for eligible persons to subsidize their housing. • Supportive Services: Funding is for new clients only, cannot be used for existing clients. HUD guidance is still coming in, need more clarity on whether it can be used to support clients for long-term case management. • Shelter: Fixed site shelter location/s to address lack of transportation to shelter and provide a safe haven concept especially for persons with mental health conditions. • Lack of capacity to address ongoing operations and regulatory compliance.

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			<p>Advice on state HOME-ARP funds:</p> <ul style="list-style-type: none"> • PSH is a better use of resources than shelter – the end goal is permanent housing • The general sense is the greatest gap is permanent affordable housing with an equal need for supportive services for those who are low and/or fixed income.
Collaborative on Child Homelessness – Illinois	Multi-disciplinary coalition focused on health and fair housing access for children, families, and pregnant persons.	Email survey	<p>Community gaps:</p> <ul style="list-style-type: none"> • Stabilization of housing for pregnant persons before the critical second trimester to avoid newborn complications like low birth weight and prematurity and also to prevent epigenetic changes to the fetus that are multi-generational. • Connection of pregnant persons, infants, and preschoolers to appropriate medical care and early childhood services. • Extremely low-income families, especially those with young children, need access to suitable and affordable housing. • More affordable housing needs to be available with enough bedrooms for families. <p>Advice on state HOME-ARP funds:</p> <ul style="list-style-type: none"> • Affordable rental housing and supportive housing services, which are essential to prevent homelessness for pregnant persons and families with young children. • Funding for supportive services and housing counseling to avert future re-entry into shelter and evictions.
Massac County Mental Health & Family Counseling Center	Mental and family health social services agency based in Metropolis, IL	Email survey	<p>Community gaps:</p> <ul style="list-style-type: none"> • Massac County lacks available shelters for men and families • Lack of resources to connect households with available low-income housing • Large population of unsheltered homeless residents • Primary and preventive health care for homeless residents <p>Advice on state HOME-ARP funds:</p> <ul style="list-style-type: none"> • Development of Affordable Rental Housing: 30% • Acquisition/Development of Non-Congregate Shelter Units: 10% • Tenant-Based Rental Assistance: 30% • Supportive Services [transitional housing, housing counseling, and homeless prevention services]: 30%
Connections For the Homeless	Housing social services agency based in Evanston, IL	Email survey	<p>Community gaps:</p> <ul style="list-style-type: none"> • Approximately 2,000 people in north suburban Cook County experience homelessness annually • People experiencing homelessness and housing instability are overrepresented by Black, Indigenous, and people of color, and these disparities are the result of ongoing systemic and institutional racism. In the last year, 81% of the people served were BIPOC • Long-term strategy and ongoing resources needed to stop evictions and foreclosures and keep people out of homelessness • Long-term expanded shelter capacity, including daytime shelters and fixed site permanent shelters to significantly decrease non-congregate shelter operating costs • Shelter that can serve the medically vulnerable and people transitioning out of hospitals who need medical respite, and crisis housing for big families that are not well served or well suited for non-congregate shelter (e.g. private hotel rooms) • Short-and long-term operating dollars for supportive services and case management to help people transition from shelter to housing and to support daytime shelter services

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			<ul style="list-style-type: none"> • More permanent supportive housing <p>Advice on state HOME-ARP funds:</p> <ul style="list-style-type: none"> • Development of Affordable Rental Housing: 0% • Acquisition/Development of Non-Congregate Shelter Units: 75% - we have a unique opportunity to permanently expand shelter capacity with one-time funds and decrease operating costs for non-congregate shelter through development & acquisition • Tenant-Based Rental Assistance: 0% • Supportive Services [transitional housing, housing counseling, and homeless prevention services]: 25% - Some funds dedicated for current shelter operating costs as agency's build their fundraising capacity to sustain operating costs long-term
Advocates for Access	Disability access service agency	Email survey	<p>Community gaps:</p> <ul style="list-style-type: none"> • Independent Living Skills training • Homeless prevention assistance • Community education <p>Advice on state HOME-ARP funds:</p> <ul style="list-style-type: none"> • Development of Affordable Rental Housing: 25% • Acquisition/Development of Non-Congregate Shelter Units: 25% • Tenant-Based Rental Assistance: 0% • Supportive Services [transitional housing, housing counseling, and homeless prevention services]: 50%
Life Links	Mental health social service agency based in Mattoon, IL	Email survey	<p>Community gaps:</p> <ul style="list-style-type: none"> • Shelter beds • Mental health case management <p>Advice on state HOME-ARP funds:</p> <ul style="list-style-type: none"> • Ranking in order of preference: <ol style="list-style-type: none"> a. Development of Affordable Rental Housing - 1 b. Tenant-Based Rental Assistance - 2 c. Supportive Services [transitional housing, housing counseling, and homeless prevention services] - 3 d. Acquisition/Development of Non-Congregate Shelter Units - 4
Association House of Chicago	Social service agency that provides wraparound housing services in English and Spanish, based in Chicago, IL	Email survey	<p>Community gaps:</p> <ul style="list-style-type: none"> • New PSH and CILA units • Funding for deferred maintenance in existing CILA units <p>Advice on state HOME-ARP funds:</p> <ul style="list-style-type: none"> • Acquisition/Development of Non-Congregate Shelter Units • Supportive Services [transitional housing, housing counseling, and homeless prevention services] • We selected the above because the shortage of units for CILA's and other PSH can be accomplished by acquiring naturally occurring affordable housing, but there are no extra funds to do so up front and when we do have the housing, the resources for extra staffing would go a long way to supporting the residents and the units
Embarras River Basin Agency (ERBA)	Community Action Agency based in east central Illinois	Email survey	<p>Community gaps:</p> <ul style="list-style-type: none"> • Emergency shelter beds • Rural transportation • Rental assistance to avoid eviction • Rapid rehousing rental assistance • Continued financial assistance for recently rehoused households <p>Advice on state HOME-ARP funds:</p>

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			<ul style="list-style-type: none"> Development of affordable rental housing and supportive services would make the most impact
Illinois Mental Health Task Force	Interdisciplinary task force formed by the Illinois Supreme Court	Email survey	<p>Community gaps:</p> <ul style="list-style-type: none"> Housing First Models Permanent Supportive Housing Models Access to safe and affordable housing for justice-involved individuals and individuals with criminal records, credit issues, etc. Housing + Services and Supports <p>Advice on state HOME-ARP funds:</p> <ul style="list-style-type: none"> Housing First and Permanent Supportive Housing Models
Home for All Continuum of Care	Continuum of Care for Peoria, Tazewell, Woodford, and Fulton Counties	Email survey	<p>Community gaps:</p> <ul style="list-style-type: none"> Shelter for individuals with sex offense on their background shelter for LGBTQ and youth specific populations (our shelters do not exclude but are not built specifically for these populations) Non-congregate shelter Permanent supportive housing Mental health services that are focused on meeting the client where they are Services for individuals who use substances that meet them where they are Communitywide approach to ending disparities and addressing issues that lead to disproportionate numbers of people of color entering homelessness <p>Advice on state HOME-ARP funds:</p> <ul style="list-style-type: none"> Development of Affordable Rental Housing - THAT RECEIVE CLIENTS FROM COORDINATED ENTRY Acquisition/Development of Non-Congregate Shelter Units - ONLY IF HOME DOLLARS WORK WELL TO SUPPORT NON-CONGREGATE SHELTER Supportive Services [transitional housing, housing counseling, and homeless prevention services] - WAGES THAT RETAIN STAFF
Children's Home of Illinois	Community support services agency based in Peoria, IL	Email survey	<p>Community gaps:</p> <ul style="list-style-type: none"> More shelter beds for youth 18 to 24 More housing units Employment programs, vocational and educational training, financial assistance programs <p>Advice on state HOME-ARP funds:</p> <ul style="list-style-type: none"> Development of Affordable Rental Housing: 25% Acquisition/Development of Non-Congregate Shelter Units: 35% Tenant-Based Rental Assistance: 10% Supportive Services [transitional housing, housing counseling, and homeless prevention services]: 30%
Centerstone	Nonprofit mental health and substance abuse treatment agency	Email survey	<p>Community gaps:</p> <ul style="list-style-type: none"> Lack of availability in current shelters, especially for adult men Difficulties getting people into shelters Available affordable housing If an individual is evicted from a HUD based unit, they do not qualify to live in these units in the future Additional barriers to stability for people with mental health issues Landlords not maintaining affordable properties <p>Advice on state HOME-ARP funds:</p> <ul style="list-style-type: none"> Development of Affordable Rental Housing Easier and more efficient process for HUD in the area/county.

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			<ul style="list-style-type: none"> • Increase in rental assistance programs, or broader qualifications • More transitional or permanent supportive housing resources. • Increase in Shelters or capacity of shelters
Pathway of Hope – The Salvation Army	Social Services Agency	Email survey	<p>Community gaps:</p> <ul style="list-style-type: none"> • Earning a living wage • Lack of safe and affordable housing • More consequences for landlords and property managers who do not maintain their properties • More non-congregate shelter for single men • More mental health and substance abuse services • More free / affordable legal services to low-income households <p>Advice on state HOME-ARP funds:</p> <ul style="list-style-type: none"> • Development of Affordable Rental Housing: 30% • Acquisition/Development of Non-Congregate Shelter Units: 40% • Tenant-Based Rental Assistance: 20% • Supportive Services [transitional housing, housing counseling, and homeless prevention services]: 10%
AMITA Health Housing and Health Alliance	Housing, health, and social services agency based in Chicago, IL	Email survey	<p>Community gaps:</p> <ul style="list-style-type: none"> • Safe and affordable subsidized housing • More locations and access for health services • More supportive services, especially case management occupational therapy, drop-in centers, and job readiness programs • Better public transportation outside of Chicago • More shelters <p>Advice on state HOME-ARP funds:</p> <ul style="list-style-type: none"> • Development of Affordable Rental Housing: 20% • Acquisition/Development of Non-Congregate Shelter Units: 25% • Tenant-Based Rental Assistance: 20% • Supportive Services [transitional housing, housing counseling, and homeless prevention services]: 35%
Macon County Continuum of Care	Continuum of Care	Email survey	<p>Community gaps:</p> <ul style="list-style-type: none"> • Affordable single units • PSH units • Supportive services to help individuals sustain housing, especially employment services <p>Advice on state HOME-ARP funds:</p> <ul style="list-style-type: none"> • Development of Affordable Rental Housing: 60% • Acquisition/Development of Non-Congregate Shelter Units: 20% • Tenant-Based Rental Assistance: 10% • Supportive Services [transitional housing, housing counseling, and homeless prevention services]: 10%
Genesis Garden	Housing social service agency based in Macomb, IL	Email survey	<p>Community gaps:</p> <ul style="list-style-type: none"> • ADA shelter beds • Transitional and re-entry housing • Affordable housing units for multi-person households • Access to Medicaid providers for mental healthcare • Rental payment assistance • Employment support services <p>Advice on state HOME-ARP funds:</p> <ul style="list-style-type: none"> • Affordable housing • Asset-based social services
Casa Michoacán	Community services agency	Email survey	<p>Community gaps:</p> <ul style="list-style-type: none"> • Shelter beds

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	based in Chicago, IL		<ul style="list-style-type: none"> • Available affordable housing units • Barriers to accessing services, such as ID requirements • Subsidized housing in gentrifying areas to prevent displacement <p>Advice on state HOME-ARP funds:</p> <ul style="list-style-type: none"> • Development of Affordable Rental Housing: 40% • Acquisition/Development of Non-Congregate Shelter Units: 20% • Tenant-Based Rental Assistance: 20% • Supportive Services [transitional housing, housing counseling, and homeless prevention services]: 20%
Veterans Assistance Commission of Will County	Emergency assistance agency for veterans based in Will County	Email survey	<p>Community gaps:</p> <ul style="list-style-type: none"> • Supportive services that pay staff a living wage • Affordable housing units that remain affordable <p>Advice on state HOME-ARP funds:</p> <ul style="list-style-type: none"> • Development of Affordable/SUSTAINABLE Rental Housing: YES • Acquisition/Development of Non-Congregate Shelter Units: YES • Tenant-Based Rental Assistance: YES • Supportive Services [transitional housing, housing counseling, and homeless prevention services]: YES – specifically services that assist a wider range of income guidelines

Summarize feedback received and results of upfront consultation with these entities:

In the course of IHDA’s HOME-ARP engagement process, IHDA requested survey responses from a statewide listserv of continuum of care organizations and their housing and health service providers. The feedback received from those CoCs and their partner organizations, detailed above, provided great additional insight into housing needs and priorities from CoCs and communities across the state, and helps to round out IHDA’s CoC outreach and feedback.

Some survey respondents provided recommended allocation percentages for the four approved HOME-ARP uses, which IHDA then averaged to find the consensus. The combined recommended allocation for IHDA’s HOME-ARP funding is:

- Acquisition/Development of Non-Congregate Shelter: 31%
- Supportive Services: 29%
- Development of Affordable Rental Housing: 28%
- Tenant-Based Rental Assistance: 12%

Other survey respondents offered rankings or priorities for the four approved uses, which IHDA categorized and summarized to find the overall ranked recommendation. The overall ranking for funding priorities is:

1. Development of Affordable Rental Housing
2. Supportive Services
3. Acquisition/Development of Non-Congregate Shelter
4. Tenant-Based Rental Assistance

Overall across both outreach methods, the CoCs and their partner agencies consistently pointed to the urgent need for more permanent shelter space in all regions of the state. The development and

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preservation of affordable housing, and the need for more affordable housing units is another desperate need in all areas of the state, in urban, suburban, and rural areas alike. Many agencies argued for new PSH housing, as a model that houses people at very low AMIs and includes supportive services to tenants. More funding for supportive services is needed to provide the wrap-around services to people that help keep them from experiencing or falling back into homelessness. Overall, tenant-based rental assistance was ranked lowest in priority for HOME-ARP funding and was generally not mentioned by the CoCs or their partner agencies as a pressing need.

List the organizations consulted: Housing and Housing-Related Service Providers (Domestic Violence, Veterans, etc.)

Agency/Org Consulted	Type of Agency/Org	Method of Consultation	Feedback
Anew South Suburban Family Shelter	DV/Homeless Transitional Housing	Survey and/or Phone Consultation	The greatest needs are landlord engagement and tenant-based rental assistance with low barriers to funding access. The greatest gap is the lack of affordable housing. Supportive Services –40% Tenant-Based Rental Assistance –40% Affordable Rental Housing –10% Non-Congregate Shelter –10%
Midwest Shelter	Homeless Veterans Services	Survey and/or Phone Consultation	The greatest need is housing for clients with criminal records or poor credit scores. The largest gap is affordable housing. Affordable Rental Housing - 50% Tenant-Based Rental Assistance - 25% Supportive Services -15% Non-Congregate Shelter -10%
DuPage County Continuum of Care	Continuum of Care Homeless Veterans	Survey and/or Phone Consultation	Combined response with Midwest Shelter
South Suburban PADS	Homeless Housing Services	Survey and/or Phone Consultation	Non-Congregate Shelter <ul style="list-style-type: none"> • \$3 million/year to provide hotel rooms for people experiencing homelessness. • Create (\$80,000/bed) and sustain (\$15,000/bed/year) 200 fixed-site emergency shelter beds for homeless individuals to replace church-based shelter/private hotel; • Create (\$150,000/apt) and sustain (\$15,000/apt/year) 15 transitional housing for homeless families’ children; Affordable Rental Housing <ul style="list-style-type: none"> • Create and sustain at least 100 additional permanent supportive housing units; Tenant-Based Rental Assistance <ul style="list-style-type: none"> • Need for 24,000 Section 8 vouchers per year to stabilize housing for people who are extremely rent burdened. Supportive Services <ul style="list-style-type: none"> • There is a need for greater access to mental health and addiction services.
Alliance to End Homelessness in Suburban Cook County	Continuum of Care Homelessness Interventions/Preventions/Crisis Housing	Survey and/or Phone Consultation	Achieving housing stability requires that we: <ul style="list-style-type: none"> • reduce inflow into homelessness by providing targeted homeless prevention assistance to help households remain stably housed, • provide accessible emergency shelter options with housing-focused case management services to quickly move households out of their crisis and into long-term housing, and

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			<p>•provide affordable housing with on-going housing stability services tailored to meet individual and households needs.</p> <p>Affordable Rental Housing – 50% Non-Congregate Shelter Units – 50% Tenant-Based Rental Assistance -0% Supportive Services -0%</p>
Women in Need Recovery Dba WIN Recovery	Transitional & Permanent Recovery Housing & Services formerly incarcerated women and individuals/At Risk of Homelessness	Survey and/or Phone Consultation	<p>Stable housing is conducive to individuals that are struggling with drug addiction. An increase in transitional houses and recovery homes after being discharged from inpatient treatment will determine if they will be re-admitted in the future for relapses along with the support services and housing to support severe behavioral and mental disorders.</p> <p>-The needs are programs and housing available to populations that are exiting prison or formerly incarcerated women</p> <p>- The needs are to achieve housing stability without the barrier of criminal background and providing support services to identify housing that will housing vouchers</p> <p>Supportive Services- 50% Rental Housing-50% Non-Congregate Shelter Units – 0% Tenant-Based Rental Assistance -0%</p>
Access Living of Metropolitan Chicago	Persons w/ Disabilities	Survey and/or Phone Consultation	<p>The biggest gap for the disability community is the lack of affordable, accessible housing for people with disabilities.</p> <p>Inaccessibility in shelter systems leaves people with disabilities with few options when facing eviction and homelessness.</p> <p>- Need for available stock of accessible and affordable housing</p> <p>- Enhanced supportive services such as housing counseling and financial literacy, as well as rental assistance programs</p> <p>Affordable Rental Housing – 50% Supportive Services - 25% Tenant-Based Rental Assistance -25% Non-Congregate Shelter -% 0</p>
La Casa Norte	Homeless/At risk Youth and Families services	Survey and/or Phone Consultation	<p>Our communities need more permanent supportive housing, transitional housing (especially for Black and Brown youth), and rental assistance. Within supportive services, more robust mental health resources for youth experiencing homelessness are desperately needed. Prior to the pandemic, 13,663 people experiencing homelessness were single, unaccompanied youth.</p>
Chicago Urban League	African American social and economic empowerment organization	Survey and/or Phone Consultation	<p>The City of Chicago reported that in January 2019 the Department of Family and Support Services provided assistance for the Homeless and that the average homeless client’s length of stay at a shelter was 111 days and only 39% of households exited to permanent destinations such as their own rental unit or moving in with family, which of course is still homelessness. This statement alone supports what most housing agencies experience, and that is the lack of shelters that provides support services to the homeless.</p> <p>Supportive Services -50% Affordable Rental Housing- 30 % Non-Congregate Shelter -20% Tenant-Based Rental Assistance -0%</p>
Association for Individual Development (AID)	Serves individuals with developmental, intellectual, physical, mental health challenges, and those who have suffered a trauma and at risk	Email Survey	<p>Needs include deeply affordable housing plus ongoing services and supports are required for homeless population that we support (people with disabilities, physical health conditions, addictions, and long-term experience on the streets). More supportive housing and non-congregate low-demand emergency shelter are desperately needed.</p> <p>Affordable Rental Housing - 50% Non-Congregate Shelter Units-25%</p>

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			Tenant-Based Rental Assistance -25% Supportive Services - 0%, there is service money available through other state programs and Medicaid.
Phoenix Community Development Services	Homeless/At risk Social service agency serving Central Illinois	Email Survey	No Response
Kankakee County Housing Authority Corporation	Kankakee County Housing Authority oversees both public housing and voucher programs	Email Survey	No Response
Helping Hands of Springfield	Provides housing, shelter, and support services to people experiencing homelessness in Central Illinois	Email Survey	No Response
Rock Island County Housing Finance Corporation	Provide Housing for low-income persons/families in Moline and East Moline, IL (Eastern IL).	Email Survey	No Response

Summarize feedback received and results of upfront consultation with these entities:

In accordance with requirements of the PJs, from December 2021 through February 2022, IHDA outreached to consult with homeless and domestic service providers, veterans’ groups, public/private agencies, and organizations, serving the qualifying homeless populations, other vulnerable populations including persons with disabilities, to supplement findings from other outreach efforts. The goal was to provide a diverse geographic perspective on the unmet needs and gaps in housing or service delivery systems for the qualifying populations.

Fourteen organizations throughout Illinois were contacted by email and/or phone to participate in a survey. Ten organizations provided responses. The feedback received during outreach are included in a summary in the table above.

Information gathered was ranked according to need; provider/organizations identified the following, 1) development of affordable housing units as the highest priority, followed by 2) supportive services, 3) development of non-congregate shelter, with little desire for 4) tenant based rental assistance.

- **South Suburban Cook County** - In 2019 in south suburban Cook approximately 12,000 people experience homelessness each year, including 3,000 students; and 24,330 people are extremely rent burdened. While south suburban Cook County has 50% of suburban Cook’s homeless total, it receives only 19% of the region’s HUD permanent supportive housing support. In addition, municipalities are unable to provide shelter, housing, and other social service assistance because their revenue is based on an inadequate property tax base. Finally, the region receives little philanthropic support. As a result of a lack of funding, there is very little permanent supportive housing and emergency shelter has been provided by volunteers operating out of church facilities. This inequality is both geographic and racial. 75% of the

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clients served by South Suburban PADS are African American and another 15% are other minorities (mixed, Latino, other).

- Suburban Cook County (North, West, etc.)**– In 2021, 1,162 people in suburban Cook County were experiencing homelessness (2021 Point in Time Count). This includes 1,044 individuals staying in emergency shelter or temporary transitional housing and 118 individuals experiencing homelessness outside, on the train, or other locations not meant for habitation. Of the 1,162 people experiencing homelessness, 23% are chronically homeless and 44% are households with children.
- Chicago Urban League** - Chicago Rents jumped about 8.5% in the past 12 months, this amount is half the national 16% rate and still behind 10% for the State of Illinois. Utilizing our rental statistics, 558 were experiencing or at a risk of homelessness, and the average person’s income is less than 30% of AMI.
- La Casa Norte** - Investing in additional transitional housing and permanent supportive housing units, supportive services accompanying them, and direct cash transfers will help (i) stabilize our most in-need Black and Brown communities, (ii) sustainably house people experiencing homelessness or position them to secure long-term housing, and (iii) unlock the potential of other social service programs (e.g., education, workforce) where stability is a prerequisite for participation.
- Supportive Housing Providers Association (SHPA)** –Illinois has an overall need of 10,749 crisis beds in order to appropriately respond to the public crisis of homelessness. In some areas, adequate facilities already exist. However, in many areas of the state, there are no fixed-site emergency shelters for people who are experiencing homelessness. In these areas, places of worship have worked to fill the breach by providing emergency shelter on a rotating basis on basement and gym floors. Recommendation to utilize emergency relief funding for the development of non-congregate emergency housing with supportive services.
- Corporation for Supportive Housing, (CSH)** – Based on CSH National Supportive Housing Needs Assessment, there are approximately 40,750 households in Illinois in need of supportive housing. Greatest need by group Justice-Involved -18%, Aging - 27%, Intellectually or Developmentally Disability - 38%. Supportive housing pairs affordable housing with tenancy support services that help people get housed and stay housed. While HOME-ARP can technically be used to fund the capital, operating, and services budget for a single project, we recommend braiding it with other financial resources to maximize its use.

List the organizations consulted: Public Housing Authorities

Agency/Org Consulted	Type of Agency/Org	Method of Consultation	Feedback
Jackson County Housing Authority	Public Housing Agency	Survey	<ul style="list-style-type: none"> There are gaps in connections to supportive housing for homeless populations

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			<ul style="list-style-type: none"> • Great need for rental assistance • Lack of access to emergency rental assistance for those impacted by Covid is exacerbating housing need – as evictions are increasing.
Lake County Housing Authority	Public Housing Agency	Survey	<ul style="list-style-type: none"> • Housing affordability is a major obstacle to housing homeless populations • There is a lack of emergency housing for those most at-risk of homelessness • Even with vouchers and emergency rental assistance, there are not enough units to house those most in need in Lake County • Demand for rental assistance has skyrocketed and there are not enough resources to meet the need.

Summarize feedback received and results of upfront consultation with these entities:

IHDA consulted with Public Housing Agencies to supplement findings from housing providers, COCs and other service providers. The goal was to provide a diverse geographic perspective on broader need relating to at-risk populations, housing instability, healthcare, supportive services, etc.

Ten Public Housing Agencies throughout Illinois were contacted and asked to participate in an electronic survey. Two agencies provided responses.

Among the findings:

- 1.) Both PHAs provide EHV and HCV vouchers. While Lake County Housing Authority has been providing direct emergency rental assistance and partners with area homelessness assistance providers to distribute funds, they also house those in need in permanent units and create stability.
- 2.) Jackson County Housing Authority cited connections for homeless populations to housing services as a gap in their community while Lake County Housing Authority cited housing affordability and the lack of resources and units to meet the needs of those most in need of safe and affordable housing.
- 3.) Both PHAs cited the need for more rental assistance to address “skyrocketing” housing costs. Additional economic effects from COVID-19 and the need to reduce and prevent evictions is becoming a larger issue and have largely exacerbated already existing barriers to keeping people housed.

Jackson Housing Authority cited ‘Tenant-Based Rental Assistance’ as the most preferred use of HOME-ARP funds (50 percent). ‘Supportive Services’ was the second preferred use (20 percent) followed by ‘Development of Affordable Rental Housing’ and ‘Acquisition/Development of Non-Congregate Shelter Units’ at 15 percent.

List the organizations consulted: Fair Housing, Policy, and Advocacy Organizations

Agency/Org Consulted	Type of Agency/Org	Method of Consultation	Feedback
Housing Action Illinois	Fair Housing Organization	Survey	<ul style="list-style-type: none"> • A relatively small amount of tenant-based rental assistance for reentry and refugee populations would have a significant impact.

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			<ul style="list-style-type: none"> • There may be a need to set aside a portion of funds for “Fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking.” • Development of non-congregate shelter should be the highest priority, as funding for this need is very limited and it helps respond to public health needs related to the COVID-19 pandemic. • For the development of affordable rental housing, funding should prioritize helping create affordable rental housing for extremely low-income households. • For supportive services, homeless prevention should be a prioritized expense • IHDA should explore whether HOME-ARP rules allow funding to target funding for reentry and refugee populations under the qualifying population
Legal Aid Chicago	Fair Housing Organization	Survey	<ul style="list-style-type: none"> • Lack of community flexibility to respond to emergency conditions • There needs to be more investment in outreach teams • There needs to be more investment in the Chicago Continuum of Care’s capacity to internally coordinate providers and effectuate a system to match homeless client preferences to available housing.

Summarize feedback received and results of upfront consultation with these entities:

IHDA consulted with fair housing organizations to supplement findings from Public Housing Agencies, housing providers, COCs and other service providers. The goal was to provide a diverse geographic perspective on broader need relating to at-risk populations, housing instability, healthcare, supportive services, etc. Ten fair housing organizations throughout Illinois were contacted and asked to participate in an electronic survey. Two agencies provided responses.

Among the findings:

- 1.) Legal Aid Chicago cited several existing gaps in serving homeless populations in Illinois, including a lack of community flexibility to respond to emergency conditions and a need for increased investment in outreach teams. Legal Aid Chicago also identified the need for increased investments in the Chicago Continuum of Care’s capacity to internally coordinate providers and improve implementation of a system that better matches homeless client preferences to available housing.
- 2.) Housing Action Illinois cited the development of non-congregate shelter as the highest funding priority due to high need, current resource limitations, and the public health needs related to the COVID-19 pandemic. Additional areas of funding priority included tenant-based rental assistance for households who are homeless or at risk of homelessness and funding for homeless prevention through supportive services. Housing Action Illinois also suggested use of funds for individual fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking and as well as a relatively small amount of tenant-based rental assistance specific for reentry and refugee populations.

List the organizations consulted: Regional Economic Development Organizations

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Agency/Org Consulted	Type of Agency/Org	Method of Consultation	Feedback
Blackhawk Hills Regional Council (BHRC)	Regional Planning & Economic Development	Survey	<ul style="list-style-type: none"> Tenant-based rental assistance identified as top need to support at-risk populations, followed by development of affordable housing units.
Two Rivers Regional Council of Public Officials	Regional Planning & Economic Development	Survey	<ul style="list-style-type: none"> Emergency shelter facilities in their region are inadequate. Acquisition and development of non-congregate shelters was identified as their top need, followed by tenant-based rental assistance to support these populations.
McLean County Regional Planning Commission (MCRPC)	Regional Planning & Economic Development	Survey	<ul style="list-style-type: none"> Development of affordable housing identified as top need, followed by acquisition and development of non-congregate shelter. There is a gap for homeless support services in their area.
North Central Illinois Council of Governments	Regional Planning & Economic Development	Survey	<ul style="list-style-type: none"> Tenant-based rental assistance identified as top need in the region, followed by supportive services for homeless populations.
Champaign County Regional Planning Commission	Regional Planning & Economic Development	Survey	<ul style="list-style-type: none"> Year-round emergency shelter beds and affordable housing units for persons with mental illness, substance use, and physical disabilities are top needs, as well as homeless support services.

Summarize feedback received and results of upfront consultation with these entities:

IHDA consulted with regional planning and economic development entities to supplement findings from Public Housing Agencies, housing providers, COCs and other service providers. The goal was to provide a diverse geographic perspective on broader need relating to at-risk populations, housing instability, healthcare, supportive services, etc. Nineteen regional organizations throughout Illinois were contacted and asked to participate in an electronic survey. Five organizations provided responses.

Among the findings:

- When ranked according to need, regional planning organizations identified development of affordable housing units as the primary need, followed by development of non-congregate shelter beds, and homeless support services.
- Recommended prioritization for HOME-ARP spending in order of highest to lowest priority was mixed across the regional organizations:
 - Development of affordable rental housing 3/5 prioritized;
 - Tenant-based rental assistance 3/5 prioritized;
 - Supportive services 3/5 prioritized;
 - Non-congregate shelter development 2/5 prioritized
- Champaign Regional Planning Commission reported a considerable need for single person, non-senior housing units to support "Moving On" from homelessness.

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- Two Rivers Regional Council indicated there is currently no shelter in Quincy which served Adams, Brown, Pike, & Schuyler Counties. The previous location was closed. As a result, the top identified need is development of non-congregate shelter facilities.
- McClean County Regional Planning reported there has been a strain on the affordable housing stock due to a growing job market that has caused much of their income-restricted and naturally occurring housing stock to be rented out to residents with a higher income. Their primary need is development of affordable housing units.

List the organizations consulted: Illinois Participating Jurisdictions

Agency/Org Consulted	Type of Agency/Org	Method of Consultation	Feedback
Cook County	County government; HOME-ARP Participating Jurisdiction	Interview	<ul style="list-style-type: none"> • Non-congregate shelter is needed, but the inability to use HOME-ARP for operating expenses is an issue • There is potential to combine transitional and permanent housing into one project • County would consider smaller-scale NCS to avoid concentrating emergency units in one place • Feedback for the State of Illinois: link supportive services connections for NCS like you already do for PSH
DuPage County	County government; HOME-ARP Participating Jurisdiction	Email	<ul style="list-style-type: none"> • Permanent supportive housing and affordable rental housing are needed
Kane County	County government; HOME-ARP Participating Jurisdiction	Email	<ul style="list-style-type: none"> • A previous needs assessment completed in Fall of 2019 showed a high need for TBRA funds • Strong need for supportive services for qualified populations as well. • The county has other federal funding for capital investment but limited funds for RRH/TBRA programs • Feedback for IL: Provide additional soft funding to LIHTC projects to ensure such projects can serve 30% AMI households
McHenry County	County government; HOME-ARP Participating Jurisdiction	Email	<ul style="list-style-type: none"> • HOME-ARP is limited to affordable housing production in McHenry County. In order to gain applicants, a local funding notice was issued in this manner. • Housing cost burden, by far, is the biggest identified issue in the county. There are little to no housing units that a 30% AMI household can truly afford. • Assisting homeless clients is another identified need, and a collaboration with a homeless provider is something the county seeks. • Feedback for IL: Any form of affordable housing development, including scattered-site or construction, with an allowance for operating costs
St. Clair County	County government; HOME-ARP Participating Jurisdiction	Email	<ul style="list-style-type: none"> • Looking into addressing homelessness, possible new construction for rental housing • Feedback for IL: Provide more housing for the homeless
Will County	County government; HOME-ARP Participating Jurisdiction	Email	<ul style="list-style-type: none"> • Planning still in process • Previous outreach indicates a need for rental units and non-congregate care units

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			<ul style="list-style-type: none"> Feedback for IL: Develop non-congregate care units through the purchase of hotels/motels. 1-2 hotels in each IL CoC would be a great contribution to ending homelessness and create long term community assets. Hotels could be cooperatively managed and operated by CoC members.
City of Aurora	Municipal government; HOME-ARP Participating Jurisdiction	Email	<ul style="list-style-type: none"> Planning still in process; no identified needs or plans yet
City of Chicago	Municipal government; HOME-ARP Participating Jurisdiction	Email	<ul style="list-style-type: none"> Cites Chicago CoC Relief Fund Working Group needs: <ul style="list-style-type: none"> 4,200 additional Permanent Supportive Housing units; 4,600 new Rapid Rehousing units; 1,000 units of other rental subsidy programs; and transition of 1,100 shelter beds that operate in congregate spaces with 20 or more people and shared bathrooms to non-congregate set ups.
City of Decatur	Municipal government; HOME-ARP Participating Jurisdiction	Interview	<ul style="list-style-type: none"> According to the local CoC, the primary needs are transportation, supportive services, housing – especially 1-bedroom transitional and permanent housing – and a 24-hour men’s shelter. Proposal under consideration: purchase and rehab of a site for PSH Feedback for IL: make funding easier to access, simplify application processes
City of Evanston	Municipal government; HOME-ARP Participating Jurisdiction	Interview	<ul style="list-style-type: none"> Needs: More affordable housing, 24-hour non-congregate shelter, operating costs for shelter, additional funding to layer onto City’s small allocation Evanston is becoming more expensive, losing middle housing, income gap is widening Potential use: NCS development – City already runs an unofficial NCS in a hotel, wants to work with shelter operator to purchase hotel for permanent NCS use
City of Peoria	Municipal government; HOME-ARP Participating Jurisdiction	Email	<ul style="list-style-type: none"> Permanent supportive housing for families identified as community need in previous needs assessment Potential use: funding for an affordable rental unit rehabilitation project currently in development
City of Rockford	Municipal government; HOME-ARP Participating Jurisdiction	Email	<ul style="list-style-type: none"> No feedback provided.
City of Urbana	Municipal government; HOME-ARP Participating Jurisdiction	Email	<ul style="list-style-type: none"> Homeless housing and/or affordable rental units seem to be the greatest need seen throughout the state.
Lake County	County government; HOME-ARP Participating Jurisdiction	Email	<ul style="list-style-type: none"> No response
Madison County	County government; HOME-ARP Participating Jurisdiction	Email	<ul style="list-style-type: none"> No response
City of Springfield	Municipal government; HOME-ARP Participating Jurisdiction	Email	<ul style="list-style-type: none"> No response

Summarize feedback received and results of upfront consultation with these entities:

The state of Illinois has sixteen Participating Jurisdictions (PJs) that receive HOME funds, in addition to the non-entitlement HOME funds that IHDA administers statewide. As part of IHDA’s consultation process for HOME-ARP funds, IHDA reached out to all sixteen PJs via email to determine local needs and potential

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uses for Illinois’ entitlement HOME-ARP allocations. Thirteen PJs provided feedback to IHDA via email or interview conducted over video call.

Overall, no PJ had yet completed its HOME-ARP allocation plan. However, initial insights into the needs of communities across the state emerged. There is a high need for non-congregate shelter and other emergency and/or transitional housing in many PJs, and the inability to use HOME-ARP for NCS operating costs represents a major barrier to the development of NCS. Affordable housing units are also needed, especially units targeting households below 30% AML.

List the organizations consulted: State Agencies (Direct Outreach Method)

Agency/Org Consulted	Type of Agency/Org	Method of Consultation	Feedback
Illinois Department on Aging	State Agency	Email Survey	<ul style="list-style-type: none"> Any major populated area will need more funding for homeless shelter and services Areas such a substance use counseling, accessing money management/representative payees will assist in achieving housing stability for older adults who are at risk or homeless There is need for all four approved HOME-ARP uses – the issues related to homelessness require numerous approaches
Illinois Department of Children and Family Services	State Agency	Email Survey	<ul style="list-style-type: none"> DCFS-involved families and youth aging out of DCFS care are all in high need of rental subsidies. Investment in all aspects of the supportive housing continuum (services to subsidy to housing) are needed.
Illinois Department of Human Services	State Agency	Email Survey	<ul style="list-style-type: none"> No additional response
Illinois Department of Healthcare and Family Services	State Agency	Email Survey	<ul style="list-style-type: none"> No response
Illinois Emergency Management Agency	State Agency	Email Survey	<ul style="list-style-type: none"> No response
Illinois Department of Commerce and Economic Opportunity	State Agency	Email Survey	<ul style="list-style-type: none"> No response

Summarize feedback received and results of upfront consultation with these entities:

As part of IHDA’s consultation process for HOME-ARP funds, IHDA reached out with a survey to six of Illinois’ state agencies whose work involves, corresponds with, or relates to housing and/or homelessness programs and services. Two agencies, the Illinois Department on Aging and Illinois Department of Children and Family Services, responded directly to IHDA’s outreach. While Illinois Department of Human Services did not reply to this specific outreach, they collaborated on many other aspects of the outreach process with IHDA.

The Illinois Department on Aging understandably focused its responses on the particular needs of older individuals in the state. The agency noted that homelessness services are needed in all areas of the state, as older individuals on fixed incomes risk homelessness.

The Illinois Department of Children and Family Services stated similar needs for youth aging out of DCFS care and families involved with DCFS programs as the Department of Aging did for older populations: all

eligible uses could assist in bolstering the resources needed for its focus populations. DCFS also pointed out subsidy would go the farthest, given their own current program and administrative infrastructure.

List the organizations consulted: State Agencies (Working Group Summary Method)

Agency/Org Consulted	Type of Agency/Org	Method of Consultation	Feedback
Illinois Department of Human Services, Illinois Department of Children & Family Services, Illinois Housing Development Authority	State Agencies	Listening Session on Dec. 17, 2021	<p>Priorities:</p> <ul style="list-style-type: none"> • The need is for long-term, systemic change • Engage with healthcare, education, corrections • Break down barriers to accessing services, particularly in rural areas • Engagement of people with lived experience in planning • Equity and racial justice • Prioritize special populations, LGBTQ, women with children... recognizing people’s journey of recovery- not everyone is abstinent from their substances but still need housing. People on opioids still need medications for recovery. • The services support and any housing assistant to persons transitioning out of our system we need to do more, and the agencies need to coordinate together as a person leaves so, they get services from other systems. • Stop expecting institutions to solve homelessness, preventing unnecessary institutionalization of individuals with disabilities and mental health. Individuals may not need to go into an institution, but they have nowhere else to go – put them in an institution or put them on the street is the choice. It is harder for them to get out once they are in. It is the default and can be an inappropriate solution.

Summarize feedback received and results of upfront consultation with these entities:

To supplement IHDA’s outreach to other state agencies, IHDA also reviewed and summarized notes from a listening session that the Illinois Department of Human Services (IDHS) hosted in December 2021 with other state agencies to gather input for the Illinois Plan to End Homelessness. This listening session was held in conjunction with the CoC listening sessions, summarized above. Representatives joined the state agency listening session from three agencies: IDHS, IHDA, and the Illinois Department of Children & Family Services.

The three agencies focused on the need in Illinois for more inter-agency coordination in planning and delivery of services. Key planning goals include a focus on racial justice and the inclusion of people with lived experience in the planning process. Priority populations who need care include members of the LGBTQ community, women with children, people in substance abuse recovery, and people with disabilities and mental health needs.

Public Participation *(to be completed at the close of the public comment period)*

In accordance with Section V.B of the Notice (page 13), PJs must provide for and encourage citizen participation in the development of the HOME-ARP allocation plan. Before submission of the plan, PJs must provide residents with reasonable notice and an opportunity to comment on the proposed HOME-ARP allocation plan of **no less than 15 calendar days**. The PJ must follow its adopted requirements for “reasonable notice and an opportunity to comment” for plan amendments in its current citizen participation plan. In addition, PJs must hold **at least one public hearing** during the development of the HOME-ARP allocation plan and prior to submission.

PJs are required to make the following information available to the public:

- The amount of HOME-ARP the PJ will receive, and
- The range of activities the PJ may undertake.

Throughout the HOME-ARP allocation plan public participation process, the PJ must follow its applicable fair housing and civil rights requirements and procedures for effective communication, accessibility, and reasonable accommodation for persons with disabilities and providing meaningful access to participation by limited English proficient (LEP) residents that are in its current citizen participation plan as required by 24 CFR 91.105 and 91.115.

Describe the public participation process, including information about and the dates of the public comment period and public hearing(s) held during the development of the plan:

- ***Date(s) of public notice:*** Click or tap to enter a date.
- ***Public comment period: start date*** - Click or tap to enter a date. ***end date*** - Click or tap to enter a date.
- ***Date(s) of public hearing:*** Click or tap to enter a date.

Describe the public participation process:

Enter narrative response here.

Describe efforts to broaden public participation:

Enter narrative response here.

Summarize the comments and recommendations received through the public participation process either in writing, or orally at a public hearing:

Enter narrative response here.

Summarize any comments or recommendations not accepted and state the reasons why:

Enter narrative response here.

Needs Assessment and Gaps Analysis

In accordance with Section V.C.1 of the Notice (page 14), a PJ must evaluate the size and demographic composition of **all four** of the qualifying populations within its boundaries and assess the unmet needs of each of those populations. If the PJ does not evaluate the needs of one of the qualifying populations, then the PJ has not completed their Needs Assessment and Gaps Analysis. In addition, a PJ must identify any gaps within its current shelter and housing inventory as well as the service delivery system. A PJ should use current data, including point in time count, housing inventory count, or other data available through CoCs, and consultations with service providers to quantify the individuals and families in the qualifying populations and their need for additional housing, shelter, or services.

Homeless Needs Inventory and Gap Analysis Table

Homeless													
	Current Inventory					Homeless Population				Gap Analysis			
	Family		Adults Only		Vets	Family HH (at least 1 child)	Adult HH (w/o child)	Vets	Victims of DV	Family		Adults Only	
	# of Beds	# of Units	# of Beds	# of Units	# of Beds					# of Beds	# of Units	# of Beds	# of Units
Emergency Shelter	2,974	1,050	5,224	-	-								
Transitional Housing	1,662	1,229	2,645	2,645	-								
Permanent Supportive Housing	-	2,645	-	1,797	-								
Other Permanent Housing	-	-	-	-	-								
Sheltered Homeless						1,029	4,690	504	1,022				
Unsheltered Homeless						34	2,149	232	196				
Current Gap										1,370	1,830	3,270	6,160

Suggested Data Sources: 1. Point in Time Count (PIT); 2. Continuum of Care Housing Inventory Count (HIC); 3. Consultation

Housing Needs Inventory and Gap Analysis Table

Non-Homeless			
	Current Inventory	Level of Need	Gap Analysis
	# of Units	# of Households	# of Households

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Total Rental Units	1,587,700		
Rental Units Affordable to HH at 30% AMI (At-Risk of Homelessness)	158,898		
Rental Units Affordable to HH at 50% AMI (Other Populations)	472,422		
0%-30% AMI Renter HH w/ 1 or more severe housing problems (At-Risk of Homelessness)		329,820	
30%-50% AMI Renter HH w/ 1 or more severe housing problems (Other Populations)		229,175	
Current Gaps			170,900

Suggested Data Sources: 1. American Community Survey (ACS); 2. Comprehensive Housing Affordability Strategy (CHAS)

Describe the size and demographic composition of qualifying populations within the PJ’s boundaries:

Homeless as defined in 24 CFR 91.5

Within Illinois, there were 7,927 sheltered and unsheltered households as of 2020. 86 percent of homeless households (6,839 households) are adult-only with another 1,063 households, (13.4 percent) families consisting of adults and children. The largest share (60.7 percent) of Illinois’ homeless populations identifies as Black/African American with Whites the second largest cohort at 35.2 percent. For unsheltered populations, Black/African Americans are 62.9 percent these populations. Populations with severe mental illness and chronic substance abuse comprised the largest share of Illinois homeless populations at a combined 52 percent.

At Risk of Homelessness as defined in 24 CFR 91.5

According to CHAS data, there are 329,820 households at 0 to 30% AMI who have one or more severe housing problems in Illinois, with an additional 229,175 households earning 30 to 50 percent AMI with one or more severe housing problems.

Fleeing, or Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking, as defined by HUD in the Notice

According to 2020 PIT data, there were 719 Domestic Violence (DV) victims sheltered served by emergency shelters and another 303 victims housed in Transitional Housing. Another 196 victims of domestic violence were unsheltered.

Other populations requiring services or housing assistance to prevent homelessness and other populations at greatest risk of housing instability, as defined by HUD in the Notice

Illinois has an estimated 229,175 renter households earning between 30% and 50% AMI with one or more severe housing problems, which HUD defines as living in a unit that lacks kitchen or plumbing, living in a crowded unit with more than 1 person per room, or a cost burden greater than 50%.

A 2020 study breaking down housing instability across Illinois by University of Illinois at Chicago and Southern Illinois University researchers, commissioned by the State, shows cost-burdened and vulnerable renter households live in all metro areas across the state (the study excluded nonmetro areas). Racially, Black and Hispanic renter households are more likely to be cost-burdened than White households, indicating that supporting cost-burdened renter households is a racial equity issue. The study found that before the pandemic, the majority of renter households in St Louis, Rockford, Kankakee, Decatur, and Chicago metro areas were cost burdened. Additionally, low-income renter households (below 80% AMI) have a higher-share of vulnerable households compared to middle-and upper income renter households. Thus, the cost burden of rental housing remains a persistent issue for low-income Illinois households across the state, and more quality affordable housing needs to be created to ensure housing stability for the population of renter households at between 30% and 50% AMI with accompanying severe housing problems.

The State of Illinois also transitions interested and eligible individuals to Community-Based Settings under three Americans with Disabilities Act (ADA) and Olmstead-related consent decrees. Some of these individuals may fall under the HOME-ARP definition of Other Populations. The most recent state data demonstrates at least 1,615 individuals in assessment pipelines are expected to transition to Community-Based Settings.

Illinois Department of Human Services also has a large state-funded Homeless Prevention Program. In FY2020, DHS assisted 13,465 individuals with \$10,349,500 of funding. The program provides rental and mortgage assistance, utility assistance, and supportive services to households who are in imminent danger of eviction, foreclosure, homelessness, or are currently homeless.

Identify and consider the current resources available to assist qualifying populations, including congregate and non-congregate shelter units, supportive services, TBRA, and affordable and permanent supportive rental housing (Optional):

Homeless Populations:

There are 8,198 emergency shelter beds serving Illinois homeless. There are an additional 1,229 and 2,645 transitional/rapid rehousing units for families and adults, respectively. Lastly, the state supports a combined 4,442 units of PSH housing, with 59 percent of these units dedicated to families or youth. According to conversations with shelter providers, COVID resulted in a reduction of overnight shelter space necessary to achieve the recommended level of social distancing. To adequately house all people currently experiencing homelessness in Illinois, the system requires the following:

- 3,580 units of housing in the form of Transitional/Rapid Rehousing units;
- 4,410 Permanent Supportive Housing units; and
- A minimum of 4,640 emergency shelter beds.

At Risk of Homelessness:

There are an estimated 159,000 units of housing in Illinois affordable to households earning at or below 30 percent AMI, a number insufficient to meet the needs of these households.¹ Additionally, there are an estimated 470,000 units of housing affordable to households at 30 to 50% AMI. For households earning 0-30% AMI, Illinois has an estimated housing shortage of 170,900 units.

Describe the unmet housing and service needs of qualifying populations:

Homeless as defined in 24 CFR 91.5

To adequately house all people currently experiencing homelessness in Illinois, the system requires the following:

- 3,580 units of housing in the form of Transitional/Rapid Rehousing units;
- 4,410 Permanent Supportive Housing units; and
- A minimum of 4,640 emergency shelter beds.

At Risk of Homelessness as defined in 24 CFR 91.5

For households earning 0-30% AMI, Illinois has an estimated housing shortage of 170,900 units. There are an additional 229,175 households earning 30 to 50 percent AMI in Illinois who have one or more severe housing problems with an estimated 472,422 units to serve these households after factoring for the share of units without complete kitchens. While this does not indicate a housing gap for these households, when rental gaps statewide are considered for households earning more than 50% AMI, limited rental supply may force households earning more than 50% AMI to compete for these 472,422 units thereby creating a shortage.

Fleeing, or Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking, as defined by HUD in the Notice

The Illinois Coalition Against Domestic Violence produced a report showing the need for over \$35,000,000 in investment for over 500,000 nights in emergency shelter and transitional housing to provide adequate, safe housing for persons feeling or attempting to flee domestic violence and similar situations as listed by HUD in the Notice.

Other populations requiring services or housing assistance to prevent homelessness and other populations at greatest risk of housing instability as defined by HUD in the Notice

Illinois has an estimated 229,175 renter households earning between 30% and 50% AMI with one or more severe housing problems, which HUD defines as living in a unit that lacks kitchen or plumbing, living in a crowded unit with more than 1 person per room, or a cost burden greater than 50%. Illinois' current inventory of rental units available to households at 50% AMI is 472,422; however, Illinois' current inventory of rental units available to households at 30% AMI total to only 158,898. While a more granular estimate of the AMI breakdown of need is unavailable within the data available (Comprehensive Housing

¹ This figure has been adjusted to factor for an estimated 1.7 percent of Illinois' housing stock lacks a complete kitchen.

Affordability Strategy (CHAS) data), the State estimates an existing unmet need for quality affordable housing options for those other populations with one or more severe housing problems. IHDA works diligently to incentivize the production and maintenance of affordable housing units for households making less than 50% AMI; however, more resources are needed to close the funding gaps such units create, as they generate less revenue than other affordable housing units (typically, HUD- funded projects offer 60% AMI units, but can go up to 80% AMI).

Identify any gaps within the current shelter and housing inventory as well as the service delivery system:

At Risk of Homelessness:

For households earning 0-30% AMI, Illinois has an estimated housing shortage of 170,900 units. There are an additional 229,175 households earning 30 to 50 percent AMI in Illinois who have one or more severe housing problems with an estimated 472,422 units to serve these households after factoring for the share of units without complete kitchens. While this does not imply a housing gap for these households, when statewide rental gaps are considered for households earning more than 50% AMI, limited rental supply may force households earning more than 50% AMI to compete for these 472,422 units thereby creating a shortage.

Currently Homeless:

There are 8,198 emergency shelter beds serving Illinois homeless. There are an additional 1,229 and 2,645 transitional/rapid rehousing units for families and adults, respectively. Lastly, the state supports a combined 4,442 units of PSH housing, with 59 percent of these units dedicated to families or youth. According to conversations with shelter providers, COVID resulted in a reduction of overnight shelter space necessary to achieve the recommended level of social distancing. To adequately house all people currently experiencing homelessness in Illinois, the system requires the following:

- 3,580 units of housing in the form of Transitional/Rapid Rehousing units;
- 4,410 Permanent Supportive Housing units; and
- A minimum of 4,640 emergency shelter beds.

Under Section IV.4.2.ii.G of the HOME-ARP Notice, a PJ may provide additional characteristics associated with instability and increased risk of homelessness in their HOME-ARP allocation plan. These characteristics will further refine the definition of “other populations” that are “At Greatest Risk of Housing Instability,” as established in the HOME-ARP Notice. If including these characteristics, identify them here:

According to the most recent data from Illinois Department of Children and Family Services, there are currently 1,645 youth over the age of 18 in child welfare in the State. Youth aging out of the child welfare system are often at risk of homelessness or housing instability as most service support ends once individuals have been discharged from care.

Additionally, the State of Illinois transitions interested and eligible individuals to Community-Based Settings under three Americans with Disabilities Act (ADA)/Olmstead-related consent decrees. Some of these individuals may fall under the HOME-ARP definition of Other Populations due to their disability

status and support service needs. IDHS also serves individuals at risk of inappropriate institutionalization by providing housing and services to those in emergency rooms or receiving healthcare where a nursing home has historically been more of the automatic option.

Justice-involved populations with a disability are also at risk of homelessness and housing instability as they exit jails and prisons across Illinois. In 2017, the Illinois Supportive Housing Working Group estimated 7,900 individuals in this population needed permanent supportive housing.

Identify priority needs for qualifying populations:

Assessment of housing gaps in Illinois indicates a severe need for permanent housing units for very low- and extremely low-income households, where 25 percent of households fall into this income tranche, yet just 10 percent of rental units statewide are affordable to these households. The state also requires more fixed-site emergency shelters, as much of the hotel and motel-based shelter inventory utilized during the pandemic has since been lost as hotels and motels begin returning to normal operations. Lastly, with lessons learned from COVID-19, the state requires a larger inventory of non-congregate housing units to transition emergency housing residents to eventual long term stable housing.

Explain how the PJ determined the level of need and gaps in the PJ's shelter and housing inventory and service delivery systems based on the data presented in the plan:

To estimate the housing and shelter needs of Illinois homeless populations, 2020 Point in Time data was used as a baseline to which a series of multipliers were applied developed from consultation with area COCs. These included family versus adult household inflow multipliers, average length of stay by population for long-term vs. short-term homeless, point in time vacancy rates of PSH housing inventory using data from Illinois Housing Development Authority portfolio, and 9 service strategy pipelines for short versus long-term homelessness.

HOME-ARP Activities

Describe the method(s) that will be used for soliciting applications for funding and/or selecting developers, service providers, subrecipients and/or contractors:

IHDA will solicit applications through one or more Requests for Proposals (RFPs) seeking development teams that partner with service providers and other community-based resources.

Rental Housing and Supportive Housing

HOME-ARP Rental Housing and Supportive Housing (RHSH) funds will be made available as follows and as further described in an RFP:

- Funds will be made available competitively statewide.
- Rental housing that meets IHDA's permanent supportive housing definition and/or is mixed with transitional housing units will be prioritized if not required in the RFP.
 - IHDA defines Permanent Supportive Housing as 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 $\leq 30\%$ 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).
- The allocations may include a set-aside, priority, or preference for applications located in an area without a HOME-ARP allocated PJ.
- If Applicants apply for Rental Housing, the RFP may include incentive for the inclusion of on-site services.
- The RFP will prioritize applications that show strong partnerships between developers, service providers, and other key project members through Memoranda of Understanding or other contractual documents.
- Applications may be able to be layered with other local, state, or federal funds.
- Applications may request and be awarded capitalized operating reserves.

Non-Congregate Shelter

HOME-ARP Non-Congregate Shelter funds will be made available as follows and as further described in an RFP:

- HOME-ARP NCS funds will be made available competitively statewide.
- The allocations may include a set-aside, priority, or preference for applications located in an area without a HOME-ARP allocated PJ.

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- Applications must show that there are sufficient operating funds to support any NCS activity, as further described in the RFP.
- The RFP may provide points or incentives for projects to have a clear path to permanent housing and services.

Describe whether the PJ will administer eligible activities directly:

At this time, IHDA does not plan to administer activities directly.

If any portion of the PJ’s HOME-ARP administrative funds are provided to a subrecipient or contractor prior to HUD’s acceptance of the HOME-ARP allocation plan because the subrecipient or contractor is responsible for the administration of the PJ’s entire HOME-ARP grant, identify the subrecipient or contractor and describe its role and responsibilities in administering all of the PJ’s HOME-ARP program:

N/A

In accordance with Section V.C.2. of the Notice (page 4), PJs must indicate the amount of HOME-ARP funding that is planned for each eligible HOME-ARP activity type and demonstrate that any planned funding for nonprofit organization operating assistance, nonprofit capacity building, and administrative costs is within HOME-ARP limits.

Use of HOME-ARP Funding

	Funding Amount	Percent of the Grant	Statutory Limit
Acquisition and Development of Non-Congregate Shelters	\$ 37,250,294		
Development of Affordable Rental Housing	\$ 15,520,956		
Administration and Planning	\$ 9,312,574	15 %	15%
Total HOME ARP Allocation	\$ 62,083,824		

* Based on the applications received, these amounts and percentages may fluctuate.

Describe how the PJ will distribute HOME-ARP funds in accordance with its priority needs identified in its needs assessment and gap analysis:

IHDA will allocate \$37.5 million (60%) of HOME-ARP dollars towards the acquisition and development of non-congregate shelters. With this funding, IHDA projects can finance the development of 250 emergency shelters beds, helping to address the need for 4,640 emergency shelter beds in Illinois. Another \$15.5 million (25%) will be allocated towards development of affordable rental housing in the form of transitional, rapid rehousing and PSH housing units. This will support development of 40 affordable housing units. Currently, there is a need in Illinois for 8,070 PSH, transitional and rapid rehousing units.

Describe how the characteristics of the shelter and housing inventory, service delivery system, and the needs identified in the gap analysis provided a rationale for the plan to fund eligible activities:

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The needs identified in the State of Illinois gap analysis determine there is a large need for transitional or Rapid Rehousing housing (over 3,500 units), permanent supportive housing (over 4,400 units) and emergency shelter (over 4,600 units). Extensive outreach to service providers, fair housing advocates, other PJs, other state agencies, and Illinois' 19 Continua of Care overall support the numerical need shown in the gaps analysis for more housing and shelter space. While rental subsidy is needed in the Northeast counties and supportive services are needed in higher volumes across the state, these are in lesser demand compared to the need for housing and shelter. With IHDA's expertise lying in these built environment activities, IHDA will focus its allocation towards creating more housing and shelter.

DRAFT

HOME-ARP Production Housing Goals

Estimate the number of affordable rental housing units for qualifying populations that the PJ will produce or support with its HOME-ARP allocation:

With HOME ARP funds allocated according to the table above, IHDA estimates 250 non-congregate shelter beds can be produced, with an additional 40 units produced of Permanent Supportive/Transitional/Rapid Rehousing units.

Describe the specific affordable rental housing production goal that the PJ hopes to achieve and describe how the production goal will address the PJ's priority needs:

Working with our statewide partners, IHDA's goal will be to produce 250 non-congregate shelter beds and 40 units of Permanent Supportive/Transitional/Rapid Rehousing units across the state.

DRAFT

Preferences

A preference provides a priority for the selection of applicants who fall into a specific QP or category (e.g., elderly or persons with disabilities) within a QP (i.e., subpopulation) to receive assistance. A *preference* permits an eligible applicant that qualifies for a PJ-adopted preference to be selected for HOME-ARP assistance before another eligible applicant that does not qualify for a preference. A *method of prioritization* is the process by which a PJ determines how two or more eligible applicants qualifying for the same or different preferences are selected for HOME-ARP assistance. For example, in a project with a preference for chronically homeless, all eligible QP applicants are selected in chronological order for a HOME-ARP rental project except that eligible QP applicants that qualify for the preference of chronically homeless are selected for occupancy based on length of time they have been homeless before eligible QP applicants who do not qualify for the preference of chronically homeless.

Please note that HUD has also described a method of prioritization in other HUD guidance. Section I.C.4 of Notice CPD-17-01 describes Prioritization in CoC CE as follows:

“Prioritization. In the context of the coordinated entry process, HUD uses the term “Prioritization” to refer to the coordinated entry-specific process by which all persons in need of assistance who use coordinated entry are ranked in order of priority. The coordinated entry prioritization policies are established by the CoC with input from all community stakeholders and must ensure that ESG projects are able to serve clients in accordance with written standards that are established under 24 CFR 576.400(e). In addition, the coordinated entry process must, to the maximum extent feasible, ensure that people with more severe service needs and levels of vulnerability are prioritized for housing and homeless assistance before those with less severe service needs and lower levels of vulnerability. Regardless of how prioritization decisions are implemented, the prioritization process must follow the requirements in Section II.B.3. and Section I.D. of this Notice.”

If a PJ is using a CE that has a method of prioritization described in CPD-17-01, then a PJ has preferences and a method of prioritizing those preferences. These must be described in the HOME-ARP allocation plan in order to comply with the requirements of Section IV.C.2 (page 10) of the HOME-ARP Notice.

In accordance with Section V.C.4 of the Notice (page 15), the HOME-ARP allocation plan must identify whether the PJ intends to give a preference to one or more qualifying populations or a subpopulation within one or more qualifying populations for any eligible activity or project.

- Preferences cannot violate any applicable fair housing, civil rights, and nondiscrimination requirements, including but not limited to those requirements listed in 24 CFR 5.105(a).
- The PJ must comply with all applicable nondiscrimination and equal opportunity laws and requirements listed in 24 CFR 5.105(a) and any other applicable fair housing and civil rights laws and requirements when establishing preferences or methods of prioritization.

While PJs are not required to describe specific projects in its HOME-ARP allocation plan to which the preferences will apply, the PJ must describe the planned use of any preferences in its HOME-ARP allocation plan. This requirement also applies if the PJ intends to commit HOME-ARP funds to projects that will utilize preferences or limitations to comply with restrictive eligibility requirements of another project funding source. **If a PJ fails to describe preferences or limitations in its plan, it cannot commit HOME-ARP funds to a project that will implement a preference or limitation until the PJ amends its HOME-ARP allocation plan. For HOME-ARP rental housing projects, Section VI.B.20.a.iii of the HOME-ARP Notice (page 36) states that owners may only limit eligibility or give a preference to a particular qualifying population or segment of the qualifying population if the limitation or preference is described in the PJ's HOME-ARP allocation plan.** Adding a preference or limitation not previously described in the plan requires a substantial amendment and a public comment period in accordance with Section V.C.6 of the Notice (page 16).

Identify whether the PJ intends to give preference to one or more qualifying populations or a subpopulation within one or more qualifying populations for any eligible activity or project:

IHDA will require preferences that must be applied to all applicants for the Rental Housing eligible activity following the prioritization listed below as well:

1. Chronically Homeless
2. Persons Exiting Institutions/Reentry into the Community
3. Youth Aging Out of the Foster Care System
4. Families with Children
5. At-Risk of Homelessness

Applicants may request to establish a preference to serve other or more specific special needs populations in addition to these preferences.

No preferences are established for the Non-Congregate Shelter eligible activity; if a Coordinated Entry system partners with a shelter facility, that Coordinated Entry system's preferences or priorities may be applied to the shelter's policies, as long as they also adhere to serve all Qualifying Populations according to HOME-ARP guidance.

If a preference was identified, explain how the use of a preference or method of prioritization will address the unmet need or gap in benefits and services received by individuals and families in the qualifying population or subpopulation of qualifying population, consistent with the PJ's needs assessment and gap analysis:

In order to support Illinois' 2022 Plan to End Homelessness, the highest priority preference will be persons experiencing chronic homelessness. This population has increased to 22% of the total homeless population since 2016, despite the overall homeless population decreasing during that time in Illinois. The Plan works to reach towards functional zero for homelessness, including chronic homelessness. Building affordable and permanent supportive housing is a key part of that goal. The other populations are

identified as key focus populations as needing focused resources according to the 2017 Supportive Housing Working Group, the 2022 Plan to End Homelessness, outreach for this allocation plan, and in the gaps analysis.

Referral Methods

PJs are not required to describe referral methods in the plan. However, if a PJ intends to use a coordinated entry (CE) process for referrals to a HOME-ARP project or activity, the PJ must ensure compliance with Section IV.C.2 of the Notice (page10).

A PJ may use only the CE for direct referrals to HOME-ARP projects and activities (as opposed to CE and other referral agencies or a waitlist) if the CE expands to accept all HOME-ARP qualifying populations and implements the preferences and prioritization established by the PJ in its HOME-ARP allocation plan. A direct referral is where the CE provides the eligible applicant directly to the PJ, subrecipient, or owner to receive HOME-ARP TBRA, supportive services, admittance to a HOME-ARP rental unit, or occupancy of a NCS unit. In comparison, an indirect referral is where a CE (or other referral source) refers an eligible applicant for placement to a project or activity waitlist. Eligible applicants are then selected for a HOME-ARP project or activity from the waitlist.

The PJ must require a project or activity to use CE along with other referral methods (as provided in Section IV.C.2.ii) or to use only a project/activity waiting list (as provided in Section IV.C.2.iii) if:

1. the CE does not have a sufficient number of qualifying individuals and families to refer to the PJ for the project or activity;
2. the CE does not include all HOME-ARP qualifying populations; or,
3. the CE fails to provide access and implement uniform referral processes in situations where a project's geographic area(s) is broader than the geographic area(s) covered by the CE

If a PJ uses a CE that prioritizes one or more qualifying populations or segments of qualifying populations (e.g., prioritizing assistance or units for chronically homeless individuals first, then prioritizing homeless youth second, followed by any other individuals qualifying as homeless, etc.) then this constitutes the use of preferences and a method of prioritization. To implement a CE with these preferences and priorities, the PJ **must** include the preferences and method of prioritization that the CE will use in the preferences section of their HOME-ARP allocation plan. Use of a CE with embedded preferences or methods of prioritization that are not contained in the PJ's HOME-ARP allocation does not comply with Section IV.C.2 of the Notice (page10).

Identify the referral methods that the PJ intends to use for its HOME-ARP projects and activities. PJ's may use multiple referral methods in its HOME-ARP program. (Optional):

IHDA may enter into one or several agreements with local Continua of Care, if there is documented need and willingness between both parties in areas where rental or supportive housing or non-congregate shelters will be located. Coordinated Entry will be one of the referral methods for each project.

If the PJ intends to use the coordinated entry (CE) process established by the CoC, describe whether all qualifying populations eligible for a project or activity will be included in the CE process, or the method by which all qualifying populations eligible for the project or activity will be covered. (Optional):

The agreement(s) between IHDA and CoC(s) will outline that the Coordinated Entry system must comply with IHDA's established preferences and adhere to all qualifying populations eligible for the project.

If the PJ intends to use the CE process established by the CoC, describe the method of prioritization to be used by the CE. (Optional):

The Coordinated Entry system(s) used will adhere to IHDA's statewide preferences, when applicable, in addition to the CE system's own methodology.

If the PJ intends to use both a CE process established by the CoC and another referral method for a project or activity, describe any method of prioritization between the two referral methods, if any. (Optional):

If IHDA partners with one or more Coordinated Entry systems, the CE system will take precedence over other referral methods. If the CE system exhausts its list and/or is unable to provide direct referrals within 30 calendar days, the project will be allowed to use other referral sources, including indirect referrals from CE systems and other sources.

Limitations in a HOME-ARP rental housing or NCS project

Limiting eligibility for a HOME-ARP rental housing or NCS project is only permitted under certain circumstances.

- PJs must follow all applicable fair housing, civil rights, and nondiscrimination requirements, including but not limited to those requirements listed in 24 CFR 5.105(a). This includes, but is not limited to, the Fair Housing Act, Title VI of the Civil Rights Act, section 504 of Rehabilitation Act, HUD's Equal Access Rule, and the Americans with Disabilities Act, as applicable.
- A PJ may not exclude otherwise eligible qualifying populations from its overall HOME-ARP program.
- Within the qualifying populations, participation in a project or activity may be limited to persons with a specific disability only, if necessary, to provide effective housing, aid, benefit, or services that would be as effective as those provided to others in accordance with 24 CFR 8.4(b)(1)(iv). A PJ must describe why such a limitation for a project or activity is necessary in its HOME-ARP allocation plan (based on the needs and gap identified by the PJ in its plan) to meet some greater need and to provide a specific benefit that cannot be provided through the provision of a preference.
- For HOME-ARP rental housing, section VI.B.20.a.iii of the Notice (page 36) states that owners may only limit eligibility to a particular qualifying population or segment of the qualifying population if the limitation is described in the PJ's HOME-ARP allocation plan.

- PJs may limit admission to HOME-ARP rental housing or NCS to households who need the specialized supportive services that are provided in such housing or NCS. However, no otherwise eligible individuals with disabilities or families including an individual with a disability who may benefit from the services provided may be excluded on the grounds that they do not have a particular disability.

Describe whether the PJ intends to limit eligibility for a HOME-ARP rental housing or NCS project to a particular qualifying population or specific subpopulation of a qualifying population identified in section IV.A of the Notice:

N/A

If a PJ intends to implement a limitation, explain why the use of a limitation is necessary to address the unmet need or gap in benefits and services received by individuals and families in the qualifying population or subpopulation of qualifying population, consistent with the PJ's needs assessment and gap analysis:

N/A

If a limitation was identified, describe how the PJ will address the unmet needs or gaps in benefits and services of the other qualifying populations that are not included in the limitation through the use of HOME-ARP funds (i.e., through another of the PJ's HOME-ARP projects or activities):

N/A

HOME-ARP Refinancing Guidelines

If the PJ intends to use HOME-ARP funds to refinance existing debt secured by multifamily rental housing that is being rehabilitated with HOME-ARP funds, the PJ must state its HOME-ARP refinancing guidelines in accordance with [24 CFR 92.206\(b\)](#). The guidelines must describe the conditions under which the PJ will refinance existing debt for a HOME-ARP rental project, including:

- ***Establish a minimum level of rehabilitation per unit or a required ratio between rehabilitation and refinancing to demonstrate that rehabilitation of HOME-ARP rental housing is the primary eligible activity***

N/A. IHDA will not be pursuing refinancing on any project with HOME-ARP funds.

- ***Require a review of management practices to demonstrate that disinvestment in the property has not occurred; that the long-term needs of the project can be met; and that the feasibility of serving qualified populations for the minimum compliance period can be demonstrated.***

N/A

- ***State whether the new investment is being made to maintain current affordable units, create additional affordable units, or both.***

N/A

- ***Specify the required compliance period, whether it is the minimum 15 years or longer.***

N/A

- ***State that HOME-ARP funds cannot be used to refinance multifamily loans made or insured by any federal program, including CDBG.***

N/A

- ***Other requirements in the PJ's guidelines, if applicable:***

N/A