

Executive Summary

ES-05 Executive Summary - 91.300(c), 91.320(b)

1. Introduction

The U.S. Department of Housing and Urban Development (HUD) requires State and local grantees of the formula grant programs, namely the Community Development Block Grant (CDBG) the HOME Program, the Emergency Solutions Grants (ESG), the Housing Opportunities for Persons with AIDS (HOPWA) and the federal Housing Trust Fund (HTF) programs, to develop a five-year Consolidated Plan as a condition for funding. The State of Illinois' Consolidated Plan covers those non-entitlement areas of the State that do not have a local Consolidated Plan. On June 16, 1994, Governor Edgar designated the Illinois Housing Development Authority (IHDA) as the lead agency in developing the Consolidated Plan. IHDA's Strategic Planning and Reporting has primary responsibility for coordinating, developing and distributing the Plan, and receives input from the Advisory Committee and the general public in developing and updating the Plan.

Executive Order 2003-18 established the State of Illinois' Comprehensive Housing Initiative on September 16, 2003, creating the Housing Task Force to improve the planning and coordination of the State's housing resources. The Comprehensive Housing Planning Act was renewed (as amended P.A. 99-0564) and extended to 2026 in legislation originally passed into law in 2016. The Executive Director of the Illinois Housing Development Authority (IHDA) is Chair of the State's Housing Task Force, joined by a panel of representatives from State agencies and the housing community. The identification of the following eight identified populations in the Executive Order provides specificity to the State's housing priorities:

1. Low-income Households (with emphasis on households earning below 30% of area median income);
2. Low-income seniors;
3. Low-income persons with disabilities;
4. Homeless persons and persons at risk of homelessness;
5. Low and moderate- income persons unable to afford housing near work or transportation (Live Near Work); and
6. Low-income persons residing in existing affordable housing that is in danger of being lost or becoming unaffordable (Preservation);
7. Low-income people residing in communities with ongoing community revitalization effort;
8. Other special needs populations, including people with criminal records and veterans experiencing or at risk of homelessness.

Per the Act, the State of Illinois shall continue to prepare and be guided by an annual comprehensive housing plan addressing the housing needs of the identified populations. Annual Comprehensive Housing Plans are to include an identification of funding sources for which the State has administrative control that are available for housing construction, rehabilitation, preservation, operating or rental subsidies, and supportive services.

2. Summary of the objectives and outcomes identified in the Plan Needs Assessment Overview

The State of Illinois will use the following HUD-determined Objective and Outcome statements for its CPD-formula activities:

1. Accessibility for the purpose of creating suitable living environments
2. Accessibility for the purpose of creating economic opportunities
3. Affordability for the purpose of providing decent affordable housing
4. Affordability for the purpose of creating economic opportunities
5. Sustainability for the purpose of creating suitable living environments
6. Sustainability for the purpose of providing decent affordable housing

3. Evaluation of past performance

At the time the draft 2025-2029 Consolidated Plan was published, HUD had not yet issued its HUD 2024 Year-End Letter. The most recent Year-end letter received by the State is the 2023 Year-end letter:

HUD has determined that the State of Illinois has the continuing capacity to administer Community Planning and Development programs, and the activities under CDBG, HOME, HOPWA, ESG and HTF were consistent with its Consolidated Plan. The State used the funds appropriately and as intended to address needs. The most recent HUD Year-End Letter received by the State at the time of publication of this document covered 2023.

On Wednesday, June 5, 2024, HUD's Office of Community Planning and Development in Chicago issued its 2023 Program Year End Review Letter to the State of Illinois. The letter is on file with and available through IHDA's Strategic Planning and Reporting's division of Compliance and Reporting. The State has until Friday, July 19, 2024, to respond to the Year-End Letter

Points of note:

It should be noted that although Program Year 2023 began on January 1st, the State/Department of Commerce and Economic Opportunity did not sign its CDBG Grant Agreement with HUD until September 28, 2023. Therefore, the due date for CDBG applications was set for January 18, 2024. The

amount of time the State has actually had PY 2023 funds available to allocate means that no 2023 grant funds have been expended at this time.

Additionally, the Department of Commerce and Economic Opportunity collects outcomes at grant closeout to ensure accuracy. As grants cover two years, outcomes collected for program year funds 2021 and later are not complete, and would not accurately reflect program activity.

In an effort to expend funds in a more timely manner, the Department increased the grant ceilings for the competitive programs of Public Infrastructure and Housing Rehabilitation. We hope this will result in spending down the backlog of funds as well as spending new money quicker.

The Illinois Department of Public Health administers the Housing Opportunity for People with HIV/AIDS (HOPWA). The Illinois Department of Public Health (IDPH), HIV/AIDS Section, as State coordinator for HUD's Housing Opportunities for Persons with AIDS program (HOPWA) is in receipt of the Program Year-End Review Letter released by HUD to the State in 2023. It should be noted that the Department expected to be spending current year funding by HRSA FFY 2026. We are committed to providing housing to persons living with HIV and feel that the Department's activities are consistent with the Consolidated Plan and the operating regulations for the HOPWA program.

4. Summary of citizen participation process and consultation process

The Public Comment period for the draft State of Illinois 2020-2029 Five Year Consolidated Plan began Wednesday, May 28, 2025, and ended Thursday, June 26, 2025. The State held one hybrid Public Hearing on Tuesday, June 24, 2025, at 10:30 A.M. via Microsoft Teams, telephone, and in-person via the following address:

Illinois Housing Development Authority (offices)

111 E. Wacker Drive, Suite 1000

Chicago, Illinois 60601

There were no verbal or written comments made by members of the public that joined the call during the public hearing, nor later via written correspondence.

- The Public Notice was published prior to the hearing in the following nine (9) newspapers: the *Belleville News-Democrat*; the *Breeze-Courier*; the *Champaign News Gazette*; the *Daily Southtown*; the *Peoria Journal-Star*; the *Rockford Register-Star*; the *Rock Island Argus-The Dispatch*; the *Southern Illinoisian*; and the *Springfield State Journal Register*.
- Notice of the public hearing was sent to CDBG-eligible units of general local government.

- The draft plan was also posted on IHDA's website at www.ihda.org. Additional electronic and hard copies of the draft 2025-2029 Consolidated Plan and 2025 Action Plan were available to interested parties as requested.
- The public hearing was held on Tuesday, June 24, 2025, during the 30-Day public comments period as required by HUD, and as explained in the Executive Summary. The Tuesday, June 24, 2025, date for the public hearing was also posted on IHDA's website.
- All notices and agendas clearly stated that the in-person site was accessible for persons with disabilities.
- The development of both the Citizen Participation Plan and Consolidated Plan provided ample opportunity for the public to provide comments.
- No public comments were made or received during the public comments period.

The criteria which the State uses to determine if certain proposed program or policy changes constitute a substantial amendment to the Consolidated Plan are as follows:

2025-2029 Consolidated Plan Substantial Amendment Changes

The following circumstances will trigger a substantial amendment to the Five-Year Plan and subsequent Action Plans:

(1) A major statutory change occurs in the enabling law which created the program that modifies the eligible types of applicants and/or the eligible types of activities which can be carried out, provided same were not at least partially eligible under the original statute and rules.

(2) Major changes in the use of the five formula grant funds from one eligible activity (as identified in the Consolidated Plan) over the original planned use.

(3) Other legislative or administrative actions that serve to significantly alter which agency(ies) are operating which existing, expanded, or new programs covered under the current (or potentially expanded) Consolidated Plan.

(4) Major change(s) due to disaster and/or emergency funding, where timeliness in meeting emergency needs is a priority. The State will follow any HUD waiver(s) and guideline(s) to abridge and shorten the citizen participation component, such as reducing the duration of the public comments period, per official guidance; and in cases of public health emergency, the State will utilize alternate methods in lieu of holding in-person meetings and hearings.

- In any of the above cases, this citizen participation plan will require that public notification occur per the following: notification to SPAR-CR Advisory Committee, various State Agencies Housing, and additional housing-related organizations, to inform them of the proposed amendment and provide for a 30-day (or in case of emergency/public health crisis, an expedited) public

comments period; and publication of press releases and public notices, and mailings, as is appropriate, to affected parties.

(5) The State shall consider all legitimate comments on the amendment, which are received in writing and orally at public hearings (if held) from the general public or units of general local government. A summary of those comments and the State responses to same will be attached to the substantial amendment, which the State will then forward to HUD for review and approval.

5. Summary of public comments

Not applicable. No public comments were made by any call-in participants to the Public Hearing. None of the Formula Grant Agencies (DCEO, IHDA, IDHS and IDPH) received any comments during the Public Comments period.

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

Not applicable. No public comments were made by callers-in to the Public Hearing

7. Summary

A minimum of two public hearings are held twice a year, one for both the Consolidated Plan/Annual Action Plan, and the Annual Performance Report. The public hearing for the Annual Performance Report will coincide with the public comments period for that document.

In addition to the public hearings, SPAR schedules meetings of the Advisory Committee (AC) to update the public on formula grant activities and provide for discussion, comment, and feedback on various Consolidated Plan-related issues. Minutes of scheduled meetings are available upon request to the SPAR Department.

The Process

PR-05 Lead & Responsible Agencies 24 CFR 91.300(b)

1. Describe agency/entity responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source

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

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

Table 1 – Responsible Agencies

Narrative

The U.S. Department of Housing and Urban Development (HUD) requires State and local grantees of the formula grant programs, namely the Community Development Block Grant (CDBG) the HOME Program, the Emergency Solutions Grants (ESG), the Housing Opportunities for Persons with AIDS (HOPWA) and the federal Housing Trust Fund (HTF) programs, to develop a five-year Consolidated Plan as a condition for funding. The State of Illinois' Consolidated Plan covers those non-entitlement areas of the State that do not have a local Consolidated Plan. On June 16, 1994, Governor Edgar designated the Illinois Housing Development Authority (IHDA) as the lead agency in developing the Consolidated Plan. IHDA's Strategic Planning and Reporting/Compliance and Reporting (SPAR/CR) has primary responsibility for coordinating, developing and distributing the Plan, and receives input from the Advisory Committee and the general public in developing and updating the Plan.

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Consolidated Plan Public Contact Information

Illinois Department of Commerce and Economic Opportunity (CDBG)

1011 South 2nd Street

Springfield, Illinois 62704

Contact: Wendy Bell

Ph: 217/558-4200

Alternate: Kara Cozadd

Illinois Housing Development Authority (HOME and HTF)

111 E. Wacker Drive

Suite 1000

Chicago, IL 60601

Contact: Burton Hughes

Ph: 312/836-5320 Fax: 312/832-2191

Alternate: Deirdre Kenny

Illinois Department of Human Services (ESG)

823 E. Monroe

Springfield, IL 62701

Contact: Josalyn Smith

Ph: 217/725-5975 Fax: 217/524-6248

Illinois Department of Public Health (HOPWA)

535 W. Jefferson

Springfield, IL 62761

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

Marleigh Andrew-Conrad

Ph: 217/785-5260 Fax:

Alternate: Steve Hopkins

Contact **(Division of Environmental Health):**

Kert McAfee

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

PR-10 Consultation – 91.100, 91.110, 91.200(b), 91.300(b), 91.200(I) and 91.315(I)

1. Introduction

The State consulted the following major advisory bodies:

- Strategic Planning and Reporting - Compliance and Reporting (SPAR-CR) Advisory Committee - This is an advisory group to SPAR-CR. This Committee's major functions are to provide input into the Consolidated Plan development (Five-Year Plan, Action Plans, and Annual Performance Reports), as well as to help set other housing goals and respond to changing policy. SPAR-CR staff meets with this group of public and private sector housing practitioners and advocates for input on both the Consolidated Plans/Annual Action Plans and the Annual Performance Reports.
- The Illinois Housing Task Force - The Task Force consists of members which are representative of various governmental agencies and/or offices, four of which are appointed by the four legislative majority and minority leaders and sixteen of which were appointed directly by the Governor based on their expertise on housing or housing-related areas. The Task Force is chaired by the Executive Director of IHDA and Vice-Chaired by a non-governmental sector representative appointed by the Governor.

Provide a concise summary of the state's activities to enhance coordination between public and assisted housing providers and private and governmental health, mental health and service agencies (91.215(I))

Public housing authorities are represented on the SPAR/CR Advisory Committee, the Housing Task Force, and the state's Affordable Housing (Trust Fund) Advisory Commission.

Describe coordination with the Continuum of Care and efforts to address the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans, and unaccompanied youth) and persons at risk of homelessness

Coordination with local Continuums of Care is a major strategy under the State's ESG program, which prioritizes assistance to Very- and Extremely-Low Income Households, Homeless and At-Risk Homeless Persons and Families, and Homeless Persons with Disabilities. The State supports applications by eligible CoCs for funding under HUD's Continuum of Care and Rural Housing Stability Assistance Programs, including the review of applications under HUD's programs in order to provide Certifications of Consistency with the State's Consolidated Plan

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

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

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

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

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

Describe consultation with the Continuum(s) of Care that serves the state in determining how to allocate ESG funds, develop performance standards and evaluate outcomes, and develop funding, policies and procedures for the administration of HMIS

Coordination with local Continuums of Care is a major strategy under the State's ESG program, which prioritizes assistance to Very- and Extremely-Low Income Households, Homeless and At-Risk Homeless Persons and Families, and Homeless Persons with Disabilities. The State supports applications by eligible CoCs for funding under HUD's Continuum of Care and Rural Housing Stability Assistance Programs, including the review of applications under HUD's programs in order to provide Certifications of Consistency with the State's Consolidated Plan

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2. Describe Agencies, groups, organizations and others who participated in the process and describe the jurisdictions consultations with housing, social service agencies and other entities

Table 2 – Agencies, groups, organizations who participated

1	Agency/Group/Organization	Illinois Housing Development Authority
	Agency/Group/Organization Type	Housing Service-Fair Housing Other government - State
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Lead-based Paint Strategy Market Analysis
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	A founding member of the SPAR-CR Advisory Committee, staffed by IHDA's Strategic Planning and Reporting/Compliance and Reporting (SPAR-CR). IHDA is the administrator of the HOME and federal Housing Trust Fund (HTF) Programs, two of the five formula grant programs, and is responsible for the coordination and submission of the State of Illinois' Consolidated Plan. IHDA also administers the Low-Income Housing Tax Credit (LIHTC) program
2	Agency/Group/Organization	Illinois Department of Commerce and Economic Opportunity
	Agency/Group/Organization Type	Housing Services-Employment Service-Fair Housing Services - Narrowing the Digital Divide Other government - State
	What section of the Plan was addressed by Consultation?	Economic Development Anti-poverty Strategy Broadband and Disaster Resilience
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	A member of the SPAR-CR Advisory Committee, DCEO is the administrator of the Community Development Block Grant (CDBG) Program, one of the five Formula Grant programs. Its mission is to create equitable economic opportunities across the State. In addition to the Office of Community Development, which administers the CDBG program, DCEO has an Office of Broadband, which addresses the connectivity needs of rural areas of the State. The Office of Community Development works with Illinois Emergency Management Agency to assist in community clean-up after natural disasters.

3	Agency/Group/Organization	ILLINOIS DEPARTMENT OF HUMAN SERVICES
	Agency/Group/Organization Type	Housing Services - Housing Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Victims of Domestic Violence Services-homeless Service-Fair Housing Services - Victims Publicly Funded Institution/System of Care Other government - State
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Market Analysis
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	A member of the SPAR-CR Advisory Committee and administrator of the Emergency Solutions Grants (ESG) Program, one of the five formula grant programs
4	Agency/Group/Organization	Illinois Department of Public Health
	Agency/Group/Organization Type	Housing Services-Persons with HIV/AIDS Services-Health Service-Fair Housing Health Agency Publicly Funded Institution/System of Care
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Lead-based Paint Strategy Non-Homeless Special Needs HOPWA Strategy

	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	A member of the SPAR-CR Advisory Committee and administrator of the Housing Opportunities for Persons With AIDS (HOPWA) Program, one of the five Formula Grant programs.
5	Agency/Group/Organization	Illinois Department on Aging
	Agency/Group/Organization Type	Housing Services - Housing Services-Elderly Persons Health Agency Publicly Funded Institution/System of Care Other government - State
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Non-Homeless Special Needs
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	A member of the SPAR-CR Advisory Committee; IDoA is the lead agency for Colbert V. Williams consent decree and administers the Community Care (elderly-in-home-services) Program.
6	Agency/Group/Organization	Illinois Department of Children and Family Services
	Agency/Group/Organization Type	Services - Housing Services-Children Services-homeless Child Welfare Agency Publicly Funded Institution/System of Care Other government - Local
	What section of the Plan was addressed by Consultation?	Homeless Needs - Families with children Homelessness Needs - Unaccompanied youth
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	A member of the SPAR-CR Advisory Committee and the State's child welfare agency.

7	Agency/Group/Organization	Illinois Department of Healthcare and Family Services
	Agency/Group/Organization Type	Services-Elderly Persons Services-Persons with Disabilities Health Agency Publicly Funded Institution/System of Care Other government - State
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Market Analysis
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	A member of the SPAR-CR Advisory Committee and the State's delegated Medicare Agency. It also operates the Supportive Living Facilities (SLF) Program under a Medicaid waiver.
8	Agency/Group/Organization	Illinois Department of Veterans' Affairs
	Agency/Group/Organization Type	Services - Housing Publicly Funded Institution/System of Care
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homeless Needs - Chronically homeless
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	A member of the SPAR-CR Advisory Committee and staff to Discharged Servicemember Task Force (DSTF).
9	Agency/Group/Organization	Illinois Department of Human Rights
	Agency/Group/Organization Type	Service-Fair Housing Other government - State
	What section of the Plan was addressed by Consultation?	Fair Housing Enforcement
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	A member of the SPAR-CR Advisory Committee and the State's fair housing agency.
10	Agency/Group/Organization	Illinois Department of Corrections
	Agency/Group/Organization Type	Publicly Funded Institution/System of Care Other government - State

	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs Re-Entry
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	A member of the Housing Task Force and administers state-funded correctional facilities.
11	Agency/Group/Organization	Macoupin County Housing Authority
	Agency/Group/Organization Type	Housing PHA Services - Housing Services-Elderly Persons Services-Persons with Disabilities
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	A member of the SPAR-CR Advisory Committee and an urban-based PHA.
12	Agency/Group/Organization	Peoria Housing Authority
	Agency/Group/Organization Type	Housing PHA Services - Housing Services-Elderly Persons Services-Persons with Disabilities
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	A member of the SPAR-CR Advisory Committee and an urban-based PHA.

13	Agency/Group/Organization	Woodford County Housing Authority
	Agency/Group/Organization Type	Housing PHA Services - Housing Services-Elderly Persons Services-Persons with Disabilities
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	A member of the SPAR-CR Advisory Committee and county-wide PHA.
14	Agency/Group/Organization	Chicago Metropolitan Agency for Planning (CMAP)
	Agency/Group/Organization Type	Regional organization Planning organization Business and Civic Leaders
	What section of the Plan was addressed by Consultation?	Data and Research
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	A Member of the SPAR-CR Advisory Committee and the State-designated regional planning agency for the 7-County Chicago metropolitan region.
15	Agency/Group/Organization	Madison County Community Development
	Agency/Group/Organization Type	Housing Other government - County
	What section of the Plan was addressed by Consultation?	Local Administrator of CDBG and HOME
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	A member of the SPAR-CR Advisory Committee. Local administrator of the CDBG Urban County Entitlement, ESG, and HOME programs locally. CoC and lead based paint abatement programs are also administered by this office.

Identify any Agency Types not consulted and provide rationale for not consulting

Not applicable. The State is open to consultation regarding affordable housing with any interested parties.Â

Other local/regional/state/federal planning efforts considered when preparing the Plan

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Continuum of Care	Regional Continuums of Care	There are eighteen Illinois Continuum of Care (CoC) statewide. Illinois CoCs coordinate their work with the Emergency Solutions Grants Program administered by IDHS, employing several similar strategies for ending homelessness in each of their jurisdictions and include the following: conducting coordinated assessments, developing additional permanent supportive housing, improving outreach, increasing capacity and enhancing organization, conducting public awareness activities to foster support, and improving transportation services (especially in rural areas).

<p>Assessment of Fair Housing-FH Impediments</p>	<p>State and Local Governments</p>	<p>January 5, 2018, HUD extended the deadline for submission of an AFH by local government program participants until the next Five-Year Plan due after October 31, 2020. However, on May 23, 2018, HUD issued three notices: The first notice withdrew HUD's January 5, 2018 notice;The second notice withdrew HUD's Assessment Tool for Local Governments; and the third notice advises that Consolidated Plan participants must legally fulfil their obligation to fair housing by way of the Analysis of Fair Housing impediments (FHI). The Preserving Community and Neighborhood Choice Final Rule was published on July 23, 2020.This final rule repeals HUDs 2015 Furthering Fair Housing regulations and the 1994 Analysis of Impediments requirements where they appear in regulations and instead returns policy to HUDs pre-1994 understanding of the 1968 Fair Housing Act's obligation to further fair housing. As such, States must continue to comply with existing obligations to further fair housing. Pending additional HUD guidance, the State will continue to provide its FFH Consolidated Plan Certification, and report on the State's actions to address fair housing impediments in the State's Consolidated Plan Annual Performance reports.Below is the State's summary of its planned actions to address Fair Housing Impediments. Besides processing fair housing complaints as a HUD-designated substantially equivalent agency, The Illinois Department of Human Rights conducts presentations and training for government agencies and community-based groups regarding fair housing rights under the Illinois Human Rights Act.1. IDHR and IHDA also shared fair housing information for wider circulation to other major membership organizations, including Housing Action Illinois (HAI), Supportive Housing Providers Association (SHPA), Illinois Housing Council (IHC), Rural Partners, Chicago Area Fair Housing Alliance (CAFHA), and other organizations.2. Lack of Fair Housing Knowledge-IDHR, through its Institute for Training and Development, regularly provides a schedule of related training, including "Basic Fair Housing Training for Landlords & Property Managers", Lifestyle-Equal Access Requirements, and Reasonable Accommodations Policies.- Sessions on fair housing-related topics are included in statewide conferences, including the Illinois NAHRO annual</p>
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Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
		conference, Illinois Association of Housing Authorities (IAHA), Housing Action Illinois (HAI), Supportive Housing Providers Association (SHPA), Rural Partners/Illinois Institute for Rural Affairs, and others.

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
FH 2 - Action to overcome impediments	State Government	<p>3. Shortage of affordable, accessible, and suitable housing-IHDA actively pursues or develops funding and assistance options for affordable housing that serve a variety of special needs populations, including: the HUD Section 811 Project-Based Rental Assistance Demonstration; the Home Accessibility Program; the Rental Housing Support Program; and first mortgage financing programs-IHDA administers combined funding for its Permanent Supportive Housing Development Program, to better target special needs populations that also need services. This includes the national Housing Trust Fund-IHDA continues to develop and improve its Low-Income Housing Tax Credit (LIHTC) Program to better serve lower-income households. Features include: enhanced accessibility (requiring twice the number of federally-required accessible housing units); Universal Design; Opportunity Areas; Community Revitalization efforts; scoring for income targeting, rental assistance, and energy conservation/green building; providing preference points to projects proposed in AHPAA communities (a State law identifying localities with less than 10% affordable housing stock); prioritizing projects that serve supportive housing populations via participation in the inter-agency Statewide Referral Network (SRN); and other areas-IHDA continues to assist Supportive Living Facilities, the state's assisted living program for elderly and persons with disabilities (via a Medicaid-approved waiver)-IHDA continues coordination with IDHS and IDoA in coordinating assistance with its Bridge Rental Subsidy Program, designed to assist class members of ADA-related court consent decrees-IHDA continues to coordinate with IDHS and local participating housing authorities which provided matching public housing and HCV units to persons with disabilities (as part of its Section 811 program)-Continues to address lead-based paint and water issues with IDPH, IEPA, IHDA, and DCEO-Continues to operate the Illinois housing search website through a third party vendor, providing real-time information on available statewide affordable housing units, monitoring for fair housing violations, and enhanced matching capability for State Referral Network (SRN) and 811 units, including those with accessible features.</p>

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
FH 3 - Actions to Overcome Impediments	State Government	<p>4. Improving lending and real estate practices-The Illinois Department of Financial and Professional Regulation(IDFPR) continues to regulate and monitor State-chartered banks and financial institutions, concentrating on mortgage fraud and predatory lending-The Illinois Attorney General's Office continues to engage in litigation regarding mortgage fraud and predatory lending -IHDA continues to provide lender training to participating banks/financial institutions which participate in its homebuyer mortgage and down payment assistance programs, which continue to include a fair housing/non-discrimination component-IHDA continues to provide credit and foreclosure prevention counseling through local agencies. IHDA continued to have lender, real estate, and developer representatives on its SPAR/SPAR-CR Advisory Committee, the State's official advisory group for the HUD-required State Consolidated Plan. Improving Enforcement-IHDA continues to include fair housing provisions in its loan and tax credit documents for approved multi-family rental housing projects. It also holds on-going training for property managers, which includes a fair housing compliance section. Specific training is done on reasonable accommodations, especially regarding persons with disabilities-IHDA also provides highlights to applicants and approved owners/developers/property managers on action steps for the Fair Housing Marketing Plans (FHMPs) to better evidence efforts to provide outreach efforts to reach those groups least likely to apply for affordable housing-IHDA also provides fair housing training to participating lenders under its homebuyer assistance programs (See Education section above). The Illinois Department of Commerce and Economic Opportunity (DCEO) provides similar fair housing training to its CDBG local government grantees at its annual grantee administrator training, and continues providing technical assistance as needed on fair housing issues, as requested or informed IHDA continues efforts to promote projects in opportunity areas as well as community revitalization areas. With the latter, this included reviews of existing affordable housing inventory to reduce geographic concentration, and promotion of more comprehensive economic/community development in these areas.</p>

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
FH 4 - Actions to Overcome Impediments	State Government	5. Lack of funding to address needs-This issue was discussed previously under Impediment #3 regarding the State's efforts to develop new program resources and pursue available funding opportunities-IHDA continues to pursue other available funding and develop new programs to address the ever-growing affordable housing needs of the State's communities, and may apply to be designated a Community Development Financial Institution (CDFI) and/or non-profit under Treasury's Capitol Magnet Fund.

<p>Fair Housing (FH)</p>	<p>Illinois Department of Human Rights</p>	<p>IDHR is responsible for administering the Illinois Human Right Act. IDHR takes and investigates charges of housing discrimination on the bases of race, color, religion, sex, national origin, ancestry, age (40 and over), marital status, physical, mental and perceived disability, military status, familial status (children under 18) sexual orientation (including gender identity) unfavorable military discharge, and order of protection status. Retaliation and interference with housing rights are also prohibited under the HRA. IDHR will continue its primary fair housing activity of docketing and investigating housing discrimination cases, including cases referred to IDHR from HUD's Office of Fair Housing and Equal Opportunity under a Cooperative Agreement under HUD's Fair Housing Assistance Program. Where the IDHR investigation leads to a substantial evidence finding of discrimination and conciliation is not successful, the claimant or respondent (the party alleged to have discriminated) can elect to have the case heard administratively for the Illinois Human Rights Commission, or in circuit court, in which case the Illinois Attorney General's Office represent the matter.</p> <p>Proposed Fair Housing Outreach Activities: IDHR will continue its education and outreach efforts to disseminate information about Illinois residents fair housing rights and responsibilities, and IDHR's fair housing enforcement activities, via its website, as well as workshops, seminars, speaking appearances, housing fairs, and distribution of literature through collaboration with numerous non-profit organizations. IDHR will continue to expand its outreach efforts to other state agencies in accordance with Illinois' Comprehensive Housing Plan. IDHR will provide free fair housing training at open-to-the-public sessions held on a quarterly basis for housing providers and landlords through its Institute for Training and Development. IDHR will continue working toward greater affordability and choice for state residents through its participation in the Interagency Subcommittee of the Illinois Housing Task Force, and continue working with the Chicago Area Fair Housing Alliance (CAFHA). IDHR will continue to provide training, networking opportunities and support for the regional and annual meetings of the Illinois Municipal Human Relations Association (IMHRA) on issues relation to fair housing, and</p>
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Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
		to the International Association for Official Human Rights Agencies.

FH (2)	IHDA (with IDHR)	<p>IHDA promotes fair housing in the marketing of all its financed units under the Illinois Affordable Housing Trust Fund, the LIHTC, HTF, and HOME Programs, which require marketing plans as part of their application processes. IHDA recognizes the importance of non-discriminatory practices with regard to residential property and related facilities. IHDA's goal is to promote a condition in which all individuals in the same housing market area have available a like range of housing choices. Thus, IHDA requires all multifamily projects with 5 or more HOME for Trust Fund assisted units comply with IHDA's fair housing policies and procedures. IHDA also evaluates proposals involving single-family projects with five or more HOME assisted units to determine the appropriateness of marketing efforts. The Affordable Housing Trust Fund Program requires that projects with 5 or more unites financed in whole or in part for family housing must have at least 20% of the units to be at least adaptable for future accessibility improvements. Projects involving HOME or the Risk Sharing Program funding must at minimum comply with the 5% minimum accessibility requirements of Section 504 of the Rehabilitation Act of 1973. Per the Qualified Allocation Plan for LIHTCs, projects must comply with all applicable federal and State accessibility laws to receive credits. Additional project scoring points are provided for developments that provide enhanced accessibility standards. For single-family programs, fair housing provisions are discussed at IHDA-hosted local training sessions and included in each lender's procedures manual, which is signed off by each participating lender's chief executive. Lenders located in urban areas of the State also must comply with the provisions of the Home Mortgage Disclosure Act and the Community Reinvestment Act, which includes monitoring by federal bank examiners for their particular category of lending institution (Office of Thrift Supervision, Federal Reserve Bank, or Office of the Comptroller of the Currency). Under Illinois' Rental Housing Support Program, all Local Administrating Agencies and participating landlords must follow all rules governing Fair Housing and all other applicable state and federal laws, and make efforts to publicize units under the RHSP, contacting non-profit corporations in the areas a LAA covers. IHDA</p>
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Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
		provides a preference to LAA applicants which target up to 30% of their requested assistance to "Special Needs Tenant".
FH (3)	DCEO (with IDHR)	DCEO administers one of the five State formula grants included in the State Consolidated Plan. DCEO requires fair housing activities (be undertaken) to be identified in each applicant local governments' application. In addition, DCEO also requires grantees to comply with applicable civil rights laws when applying for and receiving grant funds. The compliance review includes an EEO/Fair Housing review of each grantee. The agency reviews action taken to further fair housing and compliance with Section 504 of the Rehabilitation Act of 1973. DCEO requires an explanation of local efforts at the time of application and a description of how the project will further fair housing. DCEO will monitor the grantee's local actions to determine if existing action is sufficient in the following: * Provides Fair Housing Posters to grantees on an as needed basis. * Encourages grantees to adopt a fair housing ordinance. Finally, DCEO also funds accessibility improvements on privately-owned housing. This is accomplished through housing rehabilitation grantees under the CDBG Housing Rehabilitation Grants component.
FH (4)	Dept of Financial and Professional Regulations (with IDHR)	The Illinois Department of Financial and Professional Regulations (IDFPR) has two divisions that are involved in fair housing activities: Division of Banking and the Division of Professional Regulations.1. The Division of Banking is responsible for regulating commercial banks and residential mortgage bankers, brokers and loan originators. Regarding fair lending, most attention has focused on federal regulatory actions to better insure non-discrimination and community reinvestment.2. The Division of Professional Regulation licenses Real Estate Professionals, including real estate brokers, salespersons, and appraisers. The Division works with the other divisions to investigate claims of discriminatory real estate practices. Also, the Division's computer system audits every real estate licensee's continuing education course work to ensure compliance with the continuing education requirements.

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
FH (5)	Illinois Department of Insurance (with IDHR)	<p>The Illinois Department of Insurance conducts both regulatory and consumer protection activities. In keeping with an open competition regulatory philosophy, its emphasis in the fair housing areas is on education and actual complaint resolution rather than on testing and investigation of regulatory reform of industry practices based on anecdotal evidence. In the complaint process, Departmental analysts access written complaints, documentation, and responses from the company or agent mentioned in the complaint. An analyst reviews the company's/producers' actions for compliance with Illinois insurance laws and takes appropriate action if laws have been violated. All housing-related complaints are tallied and included in each company's "complaint ratio" (number of complaints per million dollars of premium)" which is made public. The Department also monitors complaint substance by company; if a complaint pattern emerges, Department officials may meet informally with the company to discuss the problem. The Department also has the authority to initiate special market conduct exams in which the company's practices are reviewed. The Department's Consumer Outreach personnel speak to various citizen groups and on radio call-in programs. The Department also provided consumer information on its website. It also takes part in the National Insurance Task force, which encouraged partnerships between insurance groups and community organizations.</p>

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
FH (6)	Illinois Council on Developmental Disabilities (with IDHR)	<p>The Illinois Council on Developmental Disabilities works to build the capabilities of individuals, families and communities, enabling each to become more self-sufficient through the Development Disabilities Assistance and Bill of Rights Act (federal law - "the DD Act"). ICDD programs are developed in direct response to the concerns and ideas voiced by consumers, families, service providers, policy makers and other professionals. The mission of the Council is to help lead change in Illinois so all people with developmental disabilities exercise their right to equal opportunity and freedom. ICDD strives to ensure the fair housing issues or barriers are resolved and people with disabilities have choice on housing options through its advocacy efforts and grant investments. The Council advocates individualized supports as a necessary means of allowing people to choose where and how they live in the community.</p>

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
FH (7)	Office of the Attorney General (with IDHR)	<p>Under the Illinois Human Rights Act (HRA) the Illinois Attorney General investigates possible fair housing violations when those violations demonstrate a pattern and practice of discrimination prohibited by the HRA. When the Attorney General has reasonable cause to believe that a person is engaged in a pattern and practice of illegal discrimination, the Attorney General may file a civil action to enforce the provisions of the HRA. Further, the Illinois Attorney General is responsible for enforcing the EBA. This duty involves investigating alleged violations of the EBA and the Illinois Accessibility Code ("Code") and may include the filing of a lawsuit where necessary to ensure compliance with the EBA. The EBA and Code apply to the construction and alteration of public facilities and qualifying multi-story housing units. for purposed of housing discrimination, the Attorney General has jurisdiction over multi-story housing which is defined as "any building of for or more stories containing ten or more dwelling units, constructed to be held out for sale or lease by any persons to the public". In addition, the Attorney General utilized the HRA and Fair Housing Amendment Act to pursued developers that design and construct inaccessible housing. The Attorney General also has the duty to implement the Civil and Equal Rights Enforcement Act ("CEREA"). CEREA (15 ILCS 210) gives the Attorney General power to investigate violations of laws related to discrimination and when such violations are established, to undertake necessary enforcement action. Thus, the Attorney General is authorized under CEREA to investigate and if necessary, litigate any housing discrimination violations that implicate the general public interest of the people of the State of Illinois. The Attorney General also conducts outreach to residents and communities throughout Illinois concerning their rights under the HRA.</p>

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Homeless Prevention: Discharge Coordination Policy	Various State Agencies	Individual and inter-agency efforts on discharge policies are underway at many agencies, and continue in conjunction with 24 CFR part 91.325, as reflects the requirement for all McKinney-Vento Homeless Assistance Act grantees. A certification that the state has established a policy for the discharge of persons from publicly funded institutions or systems of care (such as health care facilities, foster care, or other youth facilities, or correction programs and institutions) in order to prevent such discharge from immediately resulting in homelessness for such persons.

<p>Discharge Policy (2)</p>	<p>Various State Agencies</p>	<p>Under the ESG Program, the State received responses from 21 separate homeless services/shelter agencies which had submitted copies of such polices, or were developing coordinated discharge polices along with other agencies participating in their local Continuum of Care systems. A sampling of cities/areas represented (all outside of Cook County) is as follows: Springfield, Rockford, Peoria, Champaign, Quincy, Carbondale, McHenry County, Kane County, Freeport, Harrisburg, Metropolis, Danville, Olney, Highland, Princeton, Greenup, and Anna. The Illinois Department of Public Health (IDPH) operates under some eight separate State administrative rules that govern different types of hospitals, nursing homes, and assisted living facilities that it licenses or otherwise regulates. These regulations cover the following: hospitals; assisted living facilities; skilled nursing and intermediate; sheltered care; veterans' homes; intermediate care for developmentally disabled; community living facilities; and skilled nursing for under age 22. All eight administrative rules include discharge policies. The Illinois Department of Healthcare and Family Services (IDHFS) reimburses Medicaid-certified nursing homes and supportive living facilities assisting living, Home and Community based services waiver option), and complies with federal regulations for these, which require such facilities to develop a post-discharge plan of care that is developed with resident and family involvement to assist a resident to adjust to a new living environment. IDOC is developing a comprehensive screening tool that will identify those offenders who have been or are at risk of being homeless at crucial quadrants of the offenders stay in the IDOC. The administration of this tool at selected intervals of the offenders stay at IDOC will better identify the unique needs of the client and more effectively prepare for the best appropriate programming upon returning to the community. The long-range goal of this screening tool is to assist the offender in maintaining housing stability while in the community thereby becoming more productive and reduce recidivism. The Corporation for Supportive Housing (CSH) and IDOC continue to collaborate in attempting to establish 125 units of permanent supportive housing for the ex-offender population. Currently, CSH has been working with</p>
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Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
		the Illinois Criminal Justice Authority, IDMH, and the IDOC to create a Prison DataLink (data matching software between DOC and IDMH) to better identify previous recipients of state mental health services.

<p>Discharge Policy (3)</p>	<p>Various State Agencies</p>	<p>IDOC has incorporated the use of www.ReentryIllinois.net, www.illinoishousingsearch.org and www.Illinoisworkforcenet.org with institutional counselors, Placement Resource Unit (PRU) staff and parole agents. These websites were created by agencies and collaborative organizations that are sensitive to the barriers of housing experienced by the formerly incarcerated. These websites are statewide listings of resources tailored to the needs of the 10 high impact areas outlined in Inside/Out the Governor's Response to Reentry. IDOC and the Illinois Department of Human Services (IDHS) Division of Mental Health (DMH) continue discussions concerning the housing needs of ex-offenders with mental health issues through the DMH Projects for Assistance in Transition From Homeless (PATH) program. PATH is a case management project funded through SAMHSA and administered in Illinois through DMH. This collaboration attempts to provide case management supports to ex-offenders in the community that meet the criteria for participation. IDOC and IDHS-DMH are addressing this collaboration to examine ways to traverse the barriers of long-term housing needs for ex-offenders with mental illness. DHS-DMH/ PATH Program has collaborated with IDOC and piloted the PATH Ex-Offender Reentry Initiative at two correctional facilities. This initiative refers offenders with mental disorders that are at risk of homelessness to the PATH providers prior to release from the institution. Depending on the length of pre-release interaction, the PATH providers begin to link the offender to community services. PATH continued involvement with the offender in the community is determined by the need of the offender and the severity of the disorder. In Cook County, the Countywide Discharge Planning Committee has been meeting regularly. The Committee has been assisting in increasing access to mainstream benefits by promoting SOAR Training (SSI/SSDI Outreach, Access, and Recovery). A two-day training was successfully held in August. Additionally, the committee has been evaluating and discussing how the Federal Strategic Plan to Prevent and End Homelessness will affect discharge and re-entry planning in the coming years. An Interagency Subcommittee of the Illinois Housing Task Force convenes quarterly. The purpose</p>
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Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
		of this subcommittee is to allow State agencies that provide housing development dollars as well as services funding the opportunity to work together to better service the priority populations of the Annual Comprehensive Housing Plan.

Table 3 – Other local / regional / federal planning efforts

Describe cooperation and coordination among the State and any units of general local government, in the implementation of the Consolidated Plan (91.315(I))

IHDA's Strategic Planning and Reporting provides coordination between State agencies, with statewide trade and membership organizations, regional and local agencies, and local governments. The Housing Task Force and the Advisory Committee are represented by these groups as well as non-profit organizations, realtors, developers, builders, and other private industry officials, and meet regularly. In Illinois, there are over 40 CDBG Entitlement communities (plus the State-DCEO) that are responsible for either submitting their own local Consolidated Plan, or are covered by another local Consolidated Plan. These local governments are not covered by the State Consolidated Plan, but are responsible for carrying out their own separate housing strategies. Likewise, local governments that are not Entitlements under CDBG but which apply for funding directly to HUD under other programs are responsible for submitting an abbreviated local Consolidated Plan which they would be responsible for carrying out.

The relationship between the State and local governments in Illinois is clearly defined in the State Constitution. Those municipalities in Illinois which have Home Rule status have liberal powers. There is a strong sense in Illinois that these powers should not be weakened by the development generally of State regulation. As such, the State Consolidated Plan does not mandate action at the local level; rather the State Consolidated Plan indicates its support for applications by other entities, such as local governments and non-profit and for-profit organizations. For various federal programs administered at the State level (such as CDBG, HOME, and Emergency Solutions Grants), qualifying local governments are generally eligible applicants and can act as sub recipients of funding. Local governments that are covered by the State Consolidated Plan (those that do not have to do a local or abbreviated Consolidated Plan) and which receive funds under the State (CDBG, HOME, and Emergency Shelter Grants) formula grant programs are assisting the State in carrying out its strategy.

SPAR coordinates other activities with local governments and agencies primarily through statewide associations and local meetings. Presentations of meetings and provision of newsletter articles have historically been given to the Illinois Municipal League, Illinois Association of Regional Councils, Illinois Association of Housing Authorities, the Illinois Chapter of the National Association of Housing and Redevelopment Officials (NAHRO) and Rural Partners, among others. Finally, local governments are routinely invited to attend major program-related workshops, public hearings and conferences held or coordinated by IHDA and DCEO. IHDA also works closely with regional chapters of these larger organizations, such as the Metropolitan Mayors Caucus of the Illinois Municipal League and the Metropolitan Planning Council.

Narrative (optional):

Non-Profit Organizations/Private Industry Sector

The State works with statewide groups representing non-profit housing and social services agencies. These groups represent organizations that administer federal and state housing assistance programs at the local level (e.g., CDBG, HOME, AHTF, Weatherization, LIHEAP, CSBG) and/or apply for funding and administer loans and grants for specific projects. Non-profit and for-profit organizations located in areas covered by the State Consolidated Plan are also assisting the State in carrying out its strategy, and they must obtain a Certification of Consistency with the State Consolidated Plan, per HUD guidelines, to confirm that proposed HUD projects are consistent with the State strategy. Local governments and non-profit and for-profit organizations that are located in geographic areas covered by the State Consolidated Plan and that are recipients of State and private funds are also in essence helping carry out the State housing strategy.

IHDA has made efforts to ensure that private sector groups are included in its advisory groups, including the Illinois Housing Task Force and among SPAR-CR Advisory Committee attendees. The actors in housing in the private sector are lending institutions, developers, builders, investors, and realtors. The availability of adequate credit to credit-worthy customers, along with other economic factors such as unemployment, also substantially affects the housing industry. Examples of organizations represented on the Illinois Housing Task Force among the SPAR-CR Advisory Committee attendees are: the Illinois Association of Realtors, the Illinois Bankers Association, LeadingAge Illinois (formerly Life Services Network), the Rural Rental Housing Association of Illinois; and the Illinois Manufactured Housing Association. Some financial institutions have long been involved in community development and housing lending. However, this has not been the case with many banks and lenders. Several federal laws passed in the last 40 years require specific actions and practices to be carried out by federally insured lenders. The major laws passed were the Home Mortgage Disclosure Act (HMDA) of 1975, the Community Reinvestment Act (CRA) of 1977, and the Financial Institutions Reform Recovery and Enforcement Act (FIRREA) of 1989. The latter required the establishment of Affordable Housing Disposition Programs at the Resolution Trust Corporation (RTC), and of the Affordable Housing Program (AHP) at all Federal Home Loan Banks. The latter program requires a contribution of 10% of the previous year's net income of each bank to be used for this program. These programs are all aimed at providing housing opportunities to LMI persons and households. Unfortunately, due to minimum deposit requirements, many lenders in small and rural communities are not required by law to comply with CRA or HMDA.

Since 1999 there has been more directed lender involvement in housing and community development due to the establishment of the Community Development Financial Institutions (CDFI) Fund. The U.S. Department of Treasury operates this program as well as the complementary Bank Enterprise Awards (BEA) Program and New Markets Tax Credit program. A CDFI is a specialized private institution that provides a wide range of financial products and services to identified communities. CDFIs fill market niches that financial institutions are not well-positioned to serve, and include such assorted institutions as community development banks, credit union funds, venture capital funds, and micro-enterprise funds. The CDFI approach to community revitalization leverages substantial private and local resources and promotes self-sustaining CDFI organizations.

PR-15 Citizen Participation – 91.105, 91.115, 91.200(c) and 91.300(c)

1. Summary of citizen participation process/Efforts made to broaden citizen participation Summarize citizen participation process and how it impacted goal-setting

The Citizen Participation Plan

The 2025-2029 Consolidated Plan 1st Public Comment period began Wednesday, May 28, 2025, and ended Thursday, June 26, 2025 and the 2nd Public Comment period began Monday, September 8, 2025, and ended Tuesday, October 7, 2025. The State held two Statewide hybrid Public Hearings (1st held on Tuesday, June 24, 2025, and 2nd held on Tuesday, September 23, 2025) at 10:30 A.M. via Microsoft Teams, telephone, and in-person via the following address: Illinois Housing Development Authority (offices) 111 E. Wacker Drive, Suite 1000 Chicago, Illinois 60601.

- The 1st and 2nd Public Notice was published prior to the hearings in the following nine (9) newspapers: the *Belleville News-Democrat*; the *Breeze-Courier*; the *Champaign News Gazette*; the *Daily Southtown*; the *Peoria Journal-Star*; the *Rockford Register-Star*; the *Rock Island Argus-The Dispatch*; the *Southern Illinoisian*; and the *Springfield State Journal Register*.
- DCEO sent notice of the public hearing to CDBG-eligible units of general local government.
- DCEO carried out additional activities on the State CDBG Citizen Participation Plan.
- The draft plan was also posted on IHDA’s website at www.ihda.org. Additional electronic and hard copies of the draft 2025-2029 Consolidated Plan and 2025 Action Plan were sent to interested parties as requested.
- The Public Hearings were held on Tuesday, June 24, 2025 (1st) and on Tuesday, September 23, 2025 (2nd), during the 30-Day public comments period as required by HUD, and as explained in the Executive Summary. Both dates (Tuesday, June 24, 2025 and Tuesday, September 23, 2025) for the Public Hearings were also posted on IHDA’s website.
- All notices and agendas clearly stated that the in-person site was accessible for persons with disabilities.
- The development of both the Citizen Participation Plan and Consolidated Plan provided ample opportunity for the public to provide comments.

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1st Public Hearing Tuesday, June 24, 2025: There were no comments made during the public hearing or via written correspondence.

2nd Public Hearing Tuesday, September 23, 2025: There were no comments made during the Public Hearing. As the comments made by The Network Advocating Against Domestic Violence were received on the weekend Saturday, October 4, 2025, two days before the end of the 2nd Public Comments Period on Tuesday, October 7, 2025. IHDA and IDHS are still working on developing a response. The development of both the Citizen Participation Plan and 5-Year Consolidated Plan provided more than ample opportunity for the public to provide comments for the 2nd Public Comments Period.

Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
1	Public Meeting	Non-targeted/broad community	Meeting of the Strategic Planning and Reporting/Compliance and Reporting (SPAR/Compliance and Reporting Advisory Committee, providing a status update on Consolidated Plan activities under the five HUD formula grant programs.	Minutes of the Meetings of the SPAR/CR Advisory Committee are distributed at the next scheduled meeting, and available from SPAR/Compliance and Reporting upon request.	Not applicable. All comments were considered.	

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Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
2	Public Hearing	Minorities Non-English Speaking - Specify other language: Spanish Persons with disabilities Non-targeted/broad community Residents of Public and Assisted Housing		No Comments were made in person or via phone during the Public Hearing	Not applicable	

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Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
3	Newspaper Ad	Minorities Non-English Speaking - Specify other language: Spanish/English Persons with disabilities Non-targeted/broad community Residents of Public and Assisted Housing	Generally, response to newspaper ads result in attendance at the public hearing, a written letter response, or an email.	Not applicable	Not applicable	

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Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
4	Internet Outreach	Minorities Non-English Speaking - Specify other language: Spanish Persons with disabilities Non-targeted/broad community Residents of Public and Assisted Housing	Information on the IHDA website at www.ihda.org .	Generally, response to internet outreach result in attendance at the public hearing, a written letter response, or an email.	Not applicable	http://www.ihda.org

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Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
5	Public Hearing	Minorities Persons with disabilities Non-targeted/broad community Residents of Public and Assisted Housing 2025-2029 Consolidated Plan 2nd Public Hearing Meeting	The 2025-2029 Consolidated Plan 2nd Public Hearing was held hybrid via Microsoft Teams Meeting and In-Person at IHDA Office located at 111 E. Wacker Drive Suite 1000, Chicago, IL 60601.	During the 2025-2029 Consolidated Plan 2nd Public Hearing; no comments were received.	Not applicable.	

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Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
6	Newspaper Ad	Minorities Persons with disabilities Non-targeted/broad community Residents of Public and Assisted Housing 2025-2029 Consolidated Plan 2nd Public Hearing Meeting	During the 2025-2029 Consolidated Plan 2nd Public Comments Period; no public comments specifically referencing the newspaper notices were received.	Generally, response to newspaper ads will result in attendance at the Public Hearing, written letter response, and or email response.	Not applicable.	

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Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
7	Internet Outreach	Minorities Persons with disabilities Non-targeted/broad community Residents of Public and Assisted Housing 2025-2029 Consolidated Plan 2nd Public Hearing Meeting	Information of the 2025-2029 Consolidated Plan 2nd Public Comments Period was posted on the IHDA website at www.ihda.org .	During the 2025-2029 Consolidated Plan 2nd Public Comments Period; one Public Comment was received via email.	Not applicable.	

Table 4 – Citizen Participation Outreach

Needs Assessment

NA-05 Overview

Needs Assessment Overview

The Needs Assessment portion of this five year Plan will describe Illinois' housing conditions, certain populations' needs, and information about homeless and state programs to help provide housing to every person. Data tables were populated by HUD using the U.S. Census' American Community Survey and the Comprehensive Housing Affordability Strategy (CHAS) 2016-2020 data sets.

Based on the five year population numbers provided by HUD, Illinois has a total population of 12,854,526. ACS data indicate over 1.54 million people live with a disability in the State of Illinois. According to contemporaneous HUD American Housing Survey data, 1.49 million Illinoisans live in a single-person household. With about 11.5% of the population consisting in either of these demographics, these statistics are worthy of the State's agencies' attention. The most prevalent issue for households in Illinois today continues to be housing cost burden: a significant portion of the population lives with over 30% and some over 50% of their household income going to housing costs.

This part of the Plan will also discuss housing needs for special populations, including veterans, victims of domestic violence, low-income people, and those at risk of homelessness. Current housing information and needs will also be expressed by race and ethnic group, as well as area median income. Details about Continua of Care services, State agency and division programs, and public housing infrastructure are all provided to show where Illinois is succeeding in providing adequate housing for those in need, and where there may still be gaps in services.

The Needs Assessment portion of the Plan consists of the following sections:

NA-10: Housing Needs Assessment

NA-15: Disproportionately Greater Need - Housing Problems

NA-20: Disproportionately Greater Need - Severe Housing Problems

NA-25: Disproportionately Greater Need - Housing Cost Burdens

NA-30: Disproportionately Greater Need - Discussion

NA-40: Homelessness Assessment

NA-45: Non-Homeless Special Needs Assessment

NA-50: Non-Housing Community Development Needs

NA-10 Housing Needs Assessment - 24 CFR 91.305 (a,b,c)

Summary of Housing Needs

This section provides basic housing numbers and characteristics compared to the population's characteristics. It will provide information on household characteristics and income, household needs including cost-burden, and discussions of populations experiencing significant need for housing assistance, a significant number of housing problems, and significant rates of homelessness.

Demographics	Base Year: 2009	Most Recent Year: 2020	% Change
Population	12,873,717	12,854,526	-0%
Households	4,786,421	4,818,452	1%
Median Income	\$0.00	\$61,229.00	

Table 5 - Housing Needs Assessment Demographics

Data Source: 2000 Census (Base Year), 2016-2020 ACS (Most Recent Year)

Number of Households Table

	0-30% HAMFI	>30-50% HAMFI	>50-80% HAMFI	>80-100% HAMFI	>100% HAMFI
Total Households	683,825	576,195	795,835	485,935	2,276,660
Small Family Households	193,895	179,795	279,915	192,260	1,181,790
Large Family Households	49,040	54,895	76,465	48,160	206,660
Household contains at least one person 62-74 years of age	133,360	126,270	178,740	107,940	477,530
Household contains at least one person age 75 or older	106,805	120,655	121,910	54,770	152,210
Households with one or more children 6 years old or younger	112,060	94,785	119,710	76,160	229,075

Table 6 - Total Households Table

Data Source: 2016-2020 CHAS

Housing Needs Summary Tables

1. Housing Problems (Households with one of the listed needs)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Substandard Housing - Lacking complete plumbing or kitchen facilities	11,795	6,680	4,610	1,710	24,795	2,480	1,700	2,150	1,055	7,385
Severely Overcrowded - With >1.51 people per room (and complete kitchen and plumbing)	9,175	5,990	4,760	2,060	21,985	755	1,335	1,760	1,345	5,195
Overcrowded - With 1.01-1.5 people per room (and none of the above problems)	16,680	13,115	11,215	4,510	45,520	3,340	5,970	8,465	5,655	23,430
Housing cost burden greater than 50% of income (and none of the above problems)	259,000	70,770	14,155	1,855	345,780	138,195	83,680	54,760	12,905	289,540

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
Housing cost burden greater than 30% of income (and none of the above problems)	53,640	131,685	95,525	20,565	301,415	33,195	85,570	131,995	64,905	315,665
Zero/negative Income (and none of the above problems)	50,725	0	0	0	50,725	23,995	0	0	0	23,995

Table 7 – Housing Problems Table

Data 2016-2020 CHAS
Source:

2. Housing Problems 2 (Households with one or more Severe Housing Problems: Lacks kitchen or complete plumbing, severe overcrowding, severe cost burden)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Having 1 or more of four housing problems	296,645	96,550	34,745	10,135	438,075	144,770	92,680	67,135	20,955	325,540
Having none of four housing problems	111,680	194,730	282,530	146,075	735,015	56,010	192,235	411,425	308,770	968,440

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
Household has negative income, but none of the other housing problems	50,725	0	0	0	50,725	23,995	0	0	0	23,995

Table 8 – Housing Problems 2

Data 2016-2020 CHAS
Source:

3. Cost Burden > 30%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
NUMBER OF HOUSEHOLDS								
Small Related	115,270	82,105	39,610	236,985	42,765	50,330	73,160	166,255
Large Related	30,880	19,860	6,725	57,465	11,670	17,970	20,660	50,300
Elderly	77,580	47,450	20,460	145,490	88,030	82,510	63,425	233,965
Other	119,095	69,645	47,280	236,020	33,945	23,440	33,665	91,050
Total need by income	342,825	219,060	114,075	675,960	176,410	174,250	190,910	541,570

Table 9 – Cost Burden > 30%

Data 2016-2020 CHAS
Source:

4. Cost Burden > 50%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
NUMBER OF HOUSEHOLDS								
Small Related	97,015	23,525	3,775	124,315	36,325	27,770	20,635	84,730
Large Related	24,125	4,980	375	29,480	9,045	8,515	4,160	21,720

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
Elderly	57,170	20,475	4,985	82,630	67,135	36,165	20,025	123,325
Other	103,985	26,630	6,185	136,800	29,215	13,320	10,705	53,240
Total need by income	282,295	75,610	15,320	373,225	141,720	85,770	55,525	283,015

Table 10 – Cost Burden > 50%

Data Source: 2016-2020 CHAS

5. Crowding (More than one person per room)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Single family households	21,155	15,810	12,025	4,805	53,795	3,290	5,435	7,055	4,360	20,140
Multiple, unrelated family households	2,640	2,295	2,995	1,150	9,080	870	1,825	3,130	2,655	8,480
Other, non-family households	2,430	1,180	1,090	680	5,380	30	120	70	15	235
Total need by income	26,225	19,285	16,110	6,635	68,255	4,190	7,380	10,255	7,030	28,855

Table 11 – Crowding Information – 1/2

Data Source: 2016-2020 CHAS

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
Households with Children Present	0	0	0	0	0	0	0	0

Table 12 – Crowding Information – 2/2

Data Source Comments:

Describe the number and type of single person households in need of housing assistance.

According to the 2016-2020 ACS/HUD data, single person households occupy about 1,419,400 housing units in the State of Illinois (29% of occupied housing units in Illinois). There are an estimated 3,219,900 owner-occupied units in Illinois. Of these owner-occupied units, the census data indicates 22.1% of these owner-occupied units house single-person households, at about 711,700. About 409,655 (50%) of owner-occupied single person households are ages 15-64. Of these, about 242,699 owner-occupied single person households are ages 15-54.

However, according to 2022 ACS Census estimates, more than 718,000 single-person households now live in rented housing. More of the rental housing is occupied by the demographic ages, 35 to 64. Yet, up to 203,177 single-person households, ages 65 and over, live in rental housing.

Estimate the number and type of families in need of housing assistance who are disabled or victims of domestic violence, dating violence, sexual assault and stalking.

The American Community Survey 2022 Estimates indicate that 12.3% of all Illinoisians, about 1,045,083, live with a disability.

According to the 2023 PIT Count Data, 11,947 people experienced homelessness on any given night across Illinois. 7,266 were male and 4,584 were female. This number included 4,045 persons in families. 1,492 (12%) identified in the PIT were fleeing gender-based violence.

There are several types of disabilities that housing needs to address, to provide adequate opportunities and services to all Illinois residents.

Under HUD's definition of homelessness, qualifying disabilities are defined as/include: substance use disorder, serious mental illness, developmental disability, post-traumatic stress disorder, cognitive impairments resulting from brain injury or chronic physical illness or disability. According to the 2024 HUD CoC estimates, there are currently 3,065 individuals who are severely mentally ill, 2,003 individuals with chronic substance abuse, and 2,817 victims of domestic violence in Illinois experiencing homelessness.

In FY24 The Network, a DV advocacy organization that serves Illinois, responded to more than 49,000 calls, texts, & chats via its Domestic Violence Hotline, representing an increase of 45% from 2022. Though reports from this hotline do not directly report on the housing needs of DV survivors, the trends indicate that the overall outreach and therefore the needs of this population who are accessing this resource are significantly increasing in Illinois.

What are the most common housing problems?

According to the 2016-2020 Census data, along with related analyses, highlighted affordability as a major housing problem, with a large number of households experiencing cost burdens, especially among

low-income populations and renters. Inadequate housing conditions, including physically inadequate units and overcrowding, also posed challenges for some households.

1. Housing Affordability:

- **Cost Burden:** A significant portion of households, particularly renters and low-income families, were facing cost burdens, meaning they spent 30% or more of their income on housing costs. For lowest-income renters (under \$25,000 annually), a large percentage were even severely cost burdened, paying more than half of their income for housing. This affordability issue was exacerbated by rising rents and home prices outpacing income growth.
- **Impact on Household Budgets:** High housing costs forced many households to allocate larger portions of their income to housing, potentially impacting their ability to afford other essential needs like food, healthcare, and education.

2. Housing Adequacy:

- **Physically Inadequate Housing:** A smaller but still significant number of households faced physically inadequate housing, defined as units with severe or moderate physical problems, such as a lack of complete kitchen or plumbing facilities.
- **Overcrowding:** Some households were living in overcrowded conditions, defined as more than one person per room, potentially impacting health and well-being.

3. Housing Instability:

- **Increased Eviction Filings:** Following the expiration of a federal eviction moratorium, some cities saw eviction filings return to previous levels, indicating ongoing housing instability for some renters.
- **Homelessness:** Rising costs, inflation, and evictions contributed to higher rates of homelessness across the country.

Are any populations/household types more affected than others by these problems?

Based on the information available from the 2016-2020 American Community Survey (ACS) 5-year estimates and related data sources populations/household types more affected than others by these housing problems are:

- **Low-income households:** These households, particularly those defined by HUD as extremely low, very low, and low-income (primarily 30, 50, and 80 percent of median income), are the focus of Comprehensive Housing Affordability Strategy (CHAS) data which documents the extent of their housing problems and needs.
- **Renters:** Renters, especially those with lower incomes, are more likely to experience housing cost burdens, meaning they spend a higher percentage of their income on housing expenses

compared to homeowners. In 2019, 20.4 million renter households paid more than 30 percent of their incomes for housing.

- Ethnic Groups: African Americans, Native Americans, and Hispanics bear a greater burden of housing cost compared to Asian Americans and Whites.
- Rural areas: Housing units in rural areas were more affected by power outages than those in urban areas, according to 2023 American Housing Survey data.

Describe the characteristics and needs of Low-income individuals and families with children (especially extremely low-income) who are currently housed but are at imminent risk of either residing in shelters or becoming unsheltered 91.205(c)/91.305(c)). Also discuss the needs of formerly homeless families and individuals who are receiving rapid re-housing assistance and are nearing the termination of that assistance

Families fall into homelessness usually due to some unforeseen financial challenge, such as a death in the family, a lost job, or an unexpected bill, creating situations where the family cannot maintain housing. Homelessness among families is typically not a long-term experience but some families require more intensive assistance. One of the strategies for assisting families who have become homeless is rapid re-housing. The more quickly families can be directed to permanent housing, the more quickly their homelessness can be resolved, and their lives return to relative stability. Homeless prevention assistance can be in the form of cash assistance, housing subsidies, and other services; this assistance can avert homelessness before it starts. Both types of assistance are targeted to persons at risk of homelessness, individuals and families with children, veterans and individuals with physical and mental health disabilities.

Continua of Care (CoCs) in Illinois are consistent in describing low-income individuals and families. Many cite issues with being un-insured or under-insured; a lack of financial insecurity; history and ongoing troubles with substance abuse; mental health issues; being a single parent household; a lack of childcare; a lack of education and job skills; no support network; being unemployed or underemployed; and, being a domestic violence victim. Some can be at risk for two or more, if not all of these circumstances: if they are living in extreme poverty, experiencing food insecurity, dealing with physical health issues, lack transportation, and if they have a criminal background. Many CoC's also emphasize the need for more affordable housing, as many community residents are rent burdened. Several CoCs provide emergency fund assistance through rent or utility assistance. Others provide family and conflict mediation services; others have provided trainings to improve on employable skills. Other services may include: Temporary Assistance for Needy Families (TANF), Supplemental Nutrition Assistance Program (SNAP), legal aid, providing family self-sufficiency and life skill classes, and working with the local workforce investment agency (LWIA).

The State aims to provide services to prevent the individual or family from becoming homeless. Services funded include short or medium-term rental assistance and/or rental arrears, utilities, rental application fees, security deposits, last month's rent, utility deposits and payments, moving costs, housing search

and placement, housing stability case management, landlord-tenant mediation, tenant legal services, and credit repair.

Illinois Continua of Care use their coordinated assessment tools (the HMIS system) to determine each resident's needs to prevent homelessness or maintain permanent supportive housing (PSH) or affordable housing. CoCs emphasize the importance for enough PSH, so people in emergency shelters or transitional housing do not become homeless again. Other strategies include providing robust outreach for available programs and services, having well-functioning emergency shelters and transitional housing, providing life skills training (such as financial literacy, credit improvement, and education), creating housing retention services to address each individual's situation, access to health care, education tenants and landlords on their subsequent rights, providing rapid rehousing, and focusing on initial homeless prevention.

If a jurisdiction provides estimates of the at-risk population(s), it should also include a description of the operational definition of the at-risk group and the methodology used to generate the estimates:

Though the majority do not define or quantify at-risk populations, Illinois Continua of Care (CoCs) have been consistent in describing low-income individuals and families. Many have cited a lack of financial insecurity; history and ongoing troubles with substance abuse; mental health issues; being a single parent; a lack of childcare; a lack of education and job skills; no support network; being unemployed or underemployed; being un-insured or under-insured; being a domestic violence victim; and also cited people that are at risk for one or more of these additional circumstances: if they are undocumented, living in extreme poverty, experiencing food insecurity, dealing with physical health issues, lack transportation, and if they have a criminal background.

Specify particular housing characteristics that have been linked with instability and an increased risk of homelessness

Housing itself can lead to some of the characteristics that pose a risk of housing instability and homelessness. Unsafe housing stock can lead to depleting wealth resources, poor health, housing instability and homelessness itself. Providing affordable housing options can help break this cycle. Having access to safe, decent affordable housing (housing that costs less than 30% of the household's income) or a subsidy is a strong predictor of residential stability.

Many other factors, such as health, employment, education, familial structure, and RD can be linked to instability and an increased risk of homelessness. Single mothers, compared to those that are cohabitating or married are more at risk. Being a single parent and having poor social support has increased family homelessness in the past quarter century. Domestic violence and relationship instability are also significant risks for housing instability. Having fewer education opportunities or a tendency towards substance abuse may increase this risk. Families with children may have housing instability due to RD or cycles of crisis due to health, violence, or poverty. The lack of access to

broadband capability is another factor that can negatively affect both children and adults. Adults that experienced parental instability, inadequate family support, or poor care from a parent, have increased risk of experiencing housing instability and homelessness.

Continua of care have prioritized chronic and/or veterans' homelessness, especially for their permanent supportive housing and use RRH for families with children. Central Illinois' CoC, Lake County's CoC, Rockford/Winnebago/Boone/DeKalb's CoC, and Will County's CoC have all effectively ended veterans' homelessness. Rockford and its county partners has also ended chronic homelessness, with Will County's CoC ending chronic family and chronic veterans homelessness. Both Suburban Cook and Lake County CoCs are undergoing the Built for Zero initiative to attempt to effectively end veterans and chronic homelessness.

Discussion

The Illinois Housing Development Authority (IHDA), as the State's housing finance agency, and other agencies, assist with meeting the housing needs of persons with disabilities and other special needs populations including the homeless, frail elderly, emancipated youth, veterans, victims of domestic violence and stalking, ex-offenders, and persons living with HIV/AIDS. State agencies and housing and service providers work jointly and within existing committees and advisory groups to gather information on the population, housing needs and existing housing inventory available to these groups.

Activities include the State's major efforts in long-term care provision, ongoing compliance regarding court consent decrees: HUD Section 811 Program, State Referral Network, Public Housing Authority Preferencing, Supportive Living Facilities Program; Health and Housing, Home and Community Based Services Waivers; CMMS; Section 1115 Waivers, Illinois Interagency Council on Homeless; HOME Illinois, Special Populations; and Veterans.

NA-15 Disproportionately Greater Need: Housing Problems - 91.305 (b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

Introduction

Ethnic groups with disproportionately high incidence of housing problems (greater need) are discussed below. Because whites dominate the State's population, they represent the largest numbers with housing problems, but these numbers represent a smaller percentage of that specific group category as a whole, compared to others.

The 0% to 30% of Area Median Income chart below indicates that 86.64% of all households at 0-30% of AMI have one or more of four housing problems. Thus, while no ethnic group exhibits totals signifying a disproportionately greater need than that of the income category as a whole, Hispanics have the greatest need in the income category at 92.23%

Ethnic groups in the income category of 30% to 50% as a whole experience severe housing problems at a rate of 70.56% (jurisdiction as a whole). 65.84% of Whites experience severe housing problems, while 75.52% of Black/African Americans experience severe housing problems. 82.86% of Asians now experience a disproportionately greater need than the income group as a whole. American Indian/Alaska Natives are at 59.02% of need. The percentage of Hispanics experiencing severe housing problems in this category is 78.05%. Of the 66 Pacific Islander households in this category, 87.87% now experience disproportionately greater housing need in this category.

In the 50% to 80% income category, 41.39% of all groups (jurisdiction as a whole) now experience severe housing problems. 39.10% of Whites experience severe housing problems, while 42.80% of Blacks/African Americans experience severe housing problems. 40.27% of American Indian/Alaska Natives in this category now experience severe housing problems. Asians now experience severe housing problems at a disproportionately greater need of 56.59%. 46.01% of Hispanics experience severe housing problems in the category, while Pacific Islanders experience the least percentage of severe housing problems at 26.63% within this income category.

In the 80-100% of AMI category, 24.01% of all groups in the jurisdiction as a whole experience housing problem. 22.93% of Whites, 22.69% of Black African Americans, 14.4% of Pacific Islanders, and 27.05% of Hispanics experienced housing problems. The groups experiencing disproportionately greater need are American Indian/Alaska Native at 40.88%, and Asians at 35.83%.

0%-30% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	528,340	81,408	75,090
White	258,397	45,429	36,504
Black / African American	157,378	24,200	25,035
Asian	20,727	3,298	5,795
American Indian, Alaska Native	1,373	115	246
Pacific Islander	48	20	19
Hispanic	82,059	6,911	6,315

Table 13 - Disproportionally Greater Need 0 - 30% AMI

Data 2016-2020 CHAS
Source:

*The four housing problems are:

1. Lacks complete kitchen facilities,
2. Lacks complete plumbing facilities,
3. More than one person per room,
4. Cost Burden greater than 30%

30%-50% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	406,669	169,595	0
White	221,823	115,089	0
Black / African American	81,223	26,316	0
Asian	15,906	3,290	0
American Indian, Alaska Native	605	420	0
Pacific Islander	58	8	0
Hispanic	80,910	22,743	0

Table 14 - Disproportionally Greater Need 30 - 50% AMI

Data 2016-2020 CHAS
Source:

*The four housing problems are:

1. Lacks complete kitchen facilities,
2. Lacks complete plumbing facilities,
3. More than one person per room,
4. Cost Burden greater than 30%

50%-80% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	329,513	466,440	0
White	200,170	311,765	0
Black / African American	50,179	67,053	0
Asian	15,761	11,914	0
American Indian, Alaska Native	556	884	0
Pacific Islander	57	157	0
Hispanic	58,570	68,701	0

Table 15 - Disproportionally Greater Need 50 - 80% AMI

Data 2016-2020 CHAS
Source:

*The four housing problems are:

1. Lacks complete kitchen facilities,
2. Lacks complete plumbing facilities,
3. More than one person per room,
4. Cost Burden greater than 30%

80%-100% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	116,752	369,311	0
White	77,895	261,676	0
Black / African American	12,911	43,989	0
Asian	6,959	12,458	0
American Indian, Alaska Native	213	308	0
Pacific Islander	18	107	0
Hispanic	17,312	46,678	0

Table 16 - Disproportionally Greater Need 80 - 100% AMI

Data 2016-2020 CHAS
Source:

*The four housing problems are:

1. Lacks complete kitchen facilities,
2. Lacks complete plumbing facilities,
3. More than one person per room,
4. Cost Burden greater than 30%

Discussion

The data provided by HUD indicates that while the incidence of housing problems closely aligns with income, some population groups in Illinois will have a proportionately greater housing problems than the population as a whole.

The groups experiencing disproportionately greater relating to the four housing problems are American Indians/Alaska Natives at 40.88%, and Asians at 35.83%.

NA-20 Disproportionately Greater Need: Severe Housing Problems – 91.305(b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

Introduction

In the 0%-30% of AMI category, groups as a whole currently experience severe housing problems as a rate of 72.48 percent (versus 65.26% in 2020 and 72.23% per the 2015 Consolidated Plan). Within this category, Whites experience severe housing problems at a rate of 70.22% (63.01% in 2020, and 68.79% in the 2015 CP): 73.03% of Blacks currently experience severe housing problems (vs. 65.15% in 2020 and 73.81% per the 2015 CP). 77.42% of Asians now experience severe housing problems (vs. 62.39% in 2020, and 77.52% cited in the 2015 CP. American Indian/Alaska Natives experience is at 78.77% (vs. 66.30 in 2020, and 76.99% in 2015. Pacific Islander incidence is at 70.58% (0.01% in 2020, and 37.5% in 2015; Hispanic incidence of severe housing problems is at 77.64% (vs 74.22% in 2020, and 80.83% in 2015. No group meets or exceeds the threshold for disproportionate need in the 0-30% AMI category.

In the 30%-50% of AMI category, groups as a whole currently experience severe housing problems as a rate of 32.88 (versus 34% in % in 2020 and 34.35% per the 2015 Consolidated Plan). Within this category, Whites experience severe housing problems at a rate of 29.90% (vs 34.00% in 2020, and 34.45% in 2015.

34.09% of Black/African Americans (vs. 34.71% in 2020 and 37.46% in 2015) experience severe housing problems in this category. Though a much smaller percentage of the group as a whole, 47.22% of Asians experience a disproportionately greater occurrence of severe housing problems in this category, compared to 1.55% in 2020, which was itself a drastic reduction from 2015, when the group experienced a disproportionate occurrence of 50.19% in 2015). American Indian/Alaska Natives are at 33.93%, from 34.46% in 2020 and 42.43% in 2015. The percentage of Hispanics experiencing severe housing problems in this category is 38.58% (from 41.24% in 2020, and 50.19% in 2015). Of the 66 Pacific Islander households in this category, 87.87% now experience a disproportionate occurrence of severe housing problems, from 64.58% in 2020, and only 3.48% in 2015.

In the 50%-80% income category, 06.42% of all groups (vs. 16.54% in 2020 and 16.64% in 2015) experience severe housing problems. 5.18% (previously 8.18% in 2020 and 13.13% in 2015) of Whites experience severe housing problems. 5.42% of Blacks (previously 11.92% in 2020 and 15.78% in 2015) experience severe housing problems. 3.49% of American Indian/Alaska Natives experience severe housing problems (previously 0.02% in 2020 and 13.53% in 2015) Asians now experience severe housing problems in this category at 10.73%, from 24.79% in 2020, and 30.38% in 2015. 8.40% of Hispanics now experience severe housing problems in this category (from 20% in 2020 and 39% in 2015). Pacific Islanders experience severe housing problems at 5.88%.

In the 80%-100% category as a whole, 6.42% (vs 7.22% in 2020 and 9.05% in 2015) experience severe housing problems. 5.18% of Whites (vs 4.92% in 2020, 7.21% in in 2015) experience severe housing problems. 5.43% of Blacks (vs 6% in 2020, and 8.15% in 2015) experience severe housing problems. 3.49% of Alaskan Native/American Indians experience severe problems (vs. 0.01% in 2020 and 11.64% in 2015). Four Pacific Islander households experience severe problems in this income category, with no occurrence of such problems in 2020. 8.4% of Hispanic households (vs 1.55% in 2020 and 18.82% in 2015, experience severe housing problem in this category.

0%-30% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	441,807	167,877	75,090
White	213,300	90,423	36,504
Black / African American	132,628	48,970	25,035
Asian	18,611	5,426	5,795
American Indian, Alaska Native	1,173	316	246
Pacific Islander	48	20	19
Hispanic	69,116	19,897	6,315

Table 17 – Severe Housing Problems 0 - 30% AMI

Data 2016-2020 CHAS
Source:

*The four severe housing problems are:

1. Lacks complete kitchen facilities,
2. Lacks complete plumbing facilities,
3. More than 1.5 persons per room,
4. Cost Burden over 50%

30%-50% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	189,605	386,963	0
White	100,845	236,348	0
Black / African American	36,661	70,876	0
Asian	9,072	10,137	0
American Indian, Alaska Native	261	769	0

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Pacific Islander	58	8	0
Hispanic	40,013	63,695	0

Table 18 – Severe Housing Problems 30 - 50% AMI

Data 2016-2020 CHAS
Source:

*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

50%-80% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	102,104	693,737	0
White	59,263	452,642	0
Black / African American	12,288	104,877	0
Asian	6,297	21,398	0
American Indian, Alaska Native	93	1,346	0
Pacific Islander	0	214	0
Hispanic	22,828	104,489	0

Table 19 – Severe Housing Problems 50 - 80% AMI

Data 2016-2020 CHAS
Source:

*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

80%-100% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	31,222	454,903	0

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
White	17,583	321,817	0
Black / African American	3,093	53,842	0
Asian	2,578	16,819	0
American Indian, Alaska Native	52	469	0
Pacific Islander	4	121	0
Hispanic	7,474	56,482	0

Table 20 – Severe Housing Problems 80 - 100% AMI

Data 2016-2020 CHAS
Source:

*The four severe housing problems are:

1. Lacks complete kitchen facilities,
2. Lacks complete plumbing facilities,
3. More than 1.5 persons per room,
4. Cost Burden over 50%

Discussion

In the 0-30% of AMI category, no group meets or exceeds the threshold for disproportionately occurring housing problems. In the 30% to 50% AMI category, Pacific Islander and Asian households, though comprising a much smaller number of Illinois households, show a disproportionately high occurrence of severe household problems. In the 50%-80% of AMI category, both Asian and Hispanic households express a disproportionate occurrence of severe housing problems, though the number of Hispanic households comprise a much greater percentage of Illinois households at this income category. In the 80-100% AMI category, no households experience disproportionately greater need.

NA-25 Disproportionately Greater Need: Housing Cost Burdens – 91.305 (b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

Introduction

Disproportionately greater need exists when households within an income category that comprise a particular ethnic group experience need at a level at least 10 percentage points higher than the percentage of households in the income category as a whole. Because whites dominate the State's population, they represent the largest numbers with housing problems, but those numbers represent a smaller percentage of that specific group as a whole.

Housing Cost Burden

Housing Cost Burden	<=30%	30-50%	>50%	No / negative income (not computed)
Jurisdiction as a whole	3,277,089	774,700	687,130	79,375
White	2,439,276	472,687	372,762	38,299
Black / African American	329,547	132,301	170,020	26,161
Asian	145,690	35,494	30,665	6,546
American Indian, Alaska Native	3,608	1,338	1,563	246
Pacific Islander	877	126	95	19
Hispanic	322,768	121,713	101,715	6,880

Table 21 – Greater Need: Housing Cost Burdens AMI

Data 2016-2020 CHAS
Source:

Discussion

As a whole, all groups of the different income categories experience cost burden at a rate of about 97.42%. Whites included within these categories experience cost burden at 97.67%; Blacks at 96.02%; Asians at 97.00%; American Indian/Alaska Native at 96.39%; Pacific Islanders at 98.23%, and Hispanics at 98.75%.

NA-30 Disproportionately Greater Need: Discussion – 91.305 (b)(2)

Are there any income categories in which a racial or ethnic group has disproportionately greater need than the needs of that income category as a whole?

Disproportionately greater need exists when persons within an income category who are members of a particular group experience need at least 10 percentage points higher than the percentage of persons in that income category as a whole. Within a particular income category, persons who are member of a particular ethnic group would be considered experiencing a disproportionately greater need than the income category as a whole of that particular group experienced need at a level at least 10 percentage points higher than the percentage of that particular income category as a whole. Housing Need and Cost Burden data indicate continued, trending need among Hispanic household at all income levels.

If they have needs not identified above, what are those needs?

Additional efforts to address ongoing needs include the development of Permanent Supportive Housing and related services for those in the 0-30% AMI bracket, coupled with de-institutionalization; sustained funding for veterans, families, and emancipating youth; increased Housing Choice Voucher availability; fair housing assistance and education; increasing access to broadband for both rural and low income areas and households; new affordable home construction, and additional job/skills training and apprenticeships/local job development efforts

Are any of those racial or ethnic groups located in specific areas or neighborhoods in your community?

<h5>This Consolidated Plan covers the State of Illinois and encompasses all ethnic groups. The total baseline population of the State per the HUD 2016-2020 ACS default data used for this Plan is 12,854,526, representing a less than 1% change from the previous 2020-2024 Five Year Consolidated Plan. </h5>

NA-35 Public Housing – (Optional)

Introduction

The State of Illinois, through IHDA, DCEO, IDHS or otherwise, does not own or operate any public housing properties as a public housing authority. The Illinois Housing Development Authority has, however, had a role in working with Public Housing Authorities and their non-profit subsidiaries in developing additional housing stock through redevelopment, acquisition/rehabilitation and new construction, and more recently with converting public housing to Section 8 Project-Based Rental Assistance under HUD Rental Assistance Demonstration (RAD) program.

Totals in Use

	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers			Special Purpose Voucher		
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
# of units vouchers in use	0	1,644	48,249	77,685	2,367	74,258	211	279	146

Table 22 - Public Housing by Program Type

*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition

Data Source: PIC (PIH Information Center)

Characteristics of Residents

	Program Type							
	Certificate	Mod-Rehab	Public Housing	Vouchers			Special Purpose Voucher	
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program
# Homeless at admission	0	15	201	147	7	106	27	7
# of Elderly Program Participants (>62)	0	280	18,433	12,336	854	11,380	19	3
# of Disabled Families	0	546	10,140	18,694	614	17,730	98	40
# of Families requesting accessibility features	0	1,644	48,249	77,685	2,367	74,258	211	279
# of HIV/AIDS program participants	0	0	0	0	0	0	0	0
# of DV victims	0	0	0	0	0	0	0	0

Table 23 – Characteristics of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)

Race of Residents

Race	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers			Special Purpose Voucher		
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
White	0	372	21,949	17,920	772	16,685	84	149	74
Black/African American	0	1,265	24,825	59,162	1,546	57,047	124	120	70
Asian	0	2	1,256	383	34	336	2	0	0

Program Type									
Race	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project - based	Tenant - based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
American Indian/Alaska Native	0	2	149	168	12	145	0	7	2
Pacific Islander	0	3	70	52	3	45	1	3	0
Other	0	0	0	0	0	0	0	0	0

*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition

Table 24 – Race of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)

Ethnicity of Residents

Program Type									
Ethnicity	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project - based	Tenant - based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
Hispanic	0	73	2,651	5,141	139	4,844	6	49	4
Not Hispanic	0	1,571	45,598	72,544	2,228	69,414	205	230	142

*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition

Table 25 – Ethnicity of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)

Section 504 Needs Assessment: Describe the needs of public housing tenants and applicants on the waiting list for accessible units:

Not available to the State through HUD reporting process. IHDA SPAR/CR can only collect this data via individual PHA agency plan review for Consolidated Plan Certification of Consistency in non-CDBG Entitlement areas as PHA's are using the New HUD Public Housing Portal Online Template.

What are the number and type of families on the waiting lists for public housing and section 8 tenant-based rental assistance? Based on the information above, and any other information available to the jurisdiction, what are the most immediate needs of residents of public housing and Housing Choice voucher holders?

As the lead Consolidated Plan agency for the State, IHDA SPAR/CR only receives/reviews PHA Agency Plans for non-entitlement areas of the State, and attempts to voluntarily collect waiting list and inventory data on accessible units, and other information which is not captured by HUD reporting or in the current PHA Agency Plan format.

How do these needs compare to the housing needs of the population at large

Not Available. As the lead Consolidated Plan agency for the State, IHDA only receives/reviews PHA Agency Plans for non-entitlement areas of the State, and attempts to voluntarily collect waiting list and inventory data on accessible units, and other information which is not captured by HUD reporting or in the current PHA Agency Plan format.

Discussion:

IHDA, as the State's housing finance agency, and other service provider agencies, assist with meeting the housing needs of persons with disabilities and other special needs populations including the homeless, frail elderly, emancipated youth, veterans, victims of domestic violence, ex-offenders, persons living with HIV/AIDS, and those returning to the community. State agencies and housing and services providers work jointly and within existing committees and advisory groups to gather information on the population, housing needs, and existing housing inventory available for all of these groups.

Activities include the State's efforts in long term care, and discussion of court consent decrees: HUD Section 811 Program, State Referral Network; Public Housing Authority Preferencing; Supportive Living Facilities Program, Health and Housing; Home and Community Based Services Waiver, CMMS, Section 1115 Waiver, Home Illinois; Special Populations; and Veterans.

HUD approved policy allowing Illinois Public Housing Authorities to establish preference on their Public Housing and Housing Choice Voucher Waiting Lists for persons with disabilities to assist in complying with the Olmstead/ADA Supreme Court decision. PHAs are allowed to adopt a general preference for all

persons with disabilities, as well as a remedial preference which specifically allows them to provide preferences to persons with disabilities, but who are transitioning from one under a consent decree.

NA-40 Homeless Needs Assessment – 91.305(c)

Introduction:

Homelessness is an urgent crisis – and as housing prices increase dramatically, the number of people experiencing homelessness is rising across our state and our nation. In 2024, 17 of Illinois’ 19 Continuums of Care (CoCs) saw increases in the number of people experiencing homelessness in their Point-in-Time count. Of these, six Illinois CoCs saw increases of over 40% in just one year. These numbers are overwhelming, and we know each number represents a real person – a loved neighbor, father, mother, child, or friend – facing a housing crisis. We also know that a complete and robust homelessness prevention and response continuum could have prevented that individual from becoming homeless to begin with.

Homeless Needs Assessment

Population	Estimate the # of persons experiencing homelessness on a given night		Estimate the # experiencing homelessness each year	Estimate the # becoming homeless each year	Estimate the # exiting homelessness each year	Estimate the # of days persons experience homelessness
	Sheltered	Unsheltered				
Persons in Households with Adult(s) and Child(ren)	0	4,045	0	0	0	0
Persons in Households with Only Children	0	1,558	0	0	0	0
Persons in Households with Only Adults	0	7,902	0	0	0	0
Chronically Homeless Individuals	0	1,443	0	0	0	0
Chronically Homeless Families	0	0	0	0	0	0
Veterans	141	382	0	0	0	0
Unaccompanied Child	0	998	0	0	0	0
Persons with HIV	0	0	0	0	0	0

Table 26 - Homeless Needs Assessment

Data Source Comments: Sheltered 9,458Unsheltered 1,154Data not reported by all demographics that are listed.

Indicate if the homeless population is: Partially Rural Homeless

Rural Homeless Needs Assessment

Population	Estimate the # of persons experiencing homelessness on a given night		Estimate the # experiencing homelessness each year	Estimate the # becoming homeless each year	Estimate the # exiting homelessness each year	Estimate the # of days persons experience homelessness
	Sheltered	Unsheltered				
Persons in Households with Adult(s) and Child(ren)	0	0	0	0	0	0
Persons in Households with Only Children	0	0	0	0	0	0
Persons in Households with Only Adults	0	0	0	0	0	0
Chronically Homeless Individuals	0	0	0	0	0	0
Chronically Homeless Families	0	0	0	0	0	0
Veterans	0	0	0	0	0	0
Unaccompanied Youth	0	0	0	0	0	0
Persons with HIV	0	0	0	0	0	0

Table 27 - Homeless Needs Assessment

Data Source Comments: Sheltered 9,458Unsheltered 1,154Data not reported by all demographics that are listed.

For persons in rural areas who are homeless or at risk of homelessness, describe the nature and extent of unsheltered and sheltered homelessness with the jurisdiction:

Continua of Care that have rural areas do not see homeless individuals on the streets. Often time persons are in abandoned or uninhabitable housing, on campgrounds, or in wooded areas. Central Illinois' CoC has a 2-1-1 call center that helps anyone in its service area. Kane County and West Central Illinois CoCs partner with other community institutions like the police and libraries to help gauge need and access more rural areas. All of these CoCs struggle to quantify the total rural need and access individuals to provide services because it is a larger, spread out geographic area.

If data is not available for the categories "number of persons becoming and exiting homelessness each year," and "number of days that persons experience homelessness," describe these categories for each homeless population type (including chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth):

Every CoC did not report numbers under these categories but those that did are totaled in the tables above. "Number of days persons experience homelessness" uses median values collected from persons in emergency shelter across all nineteen CoCs.

Nature and Extent of Homelessness: (Optional)

Race:	Sheltered:	Unsheltered (optional)
White	5,535	0
Black or African American	5,583	0
Asian	197	0
American Indian or Alaska Native	143	0
Pacific Islander	62	0
Ethnicity:	Sheltered:	Unsheltered (optional)
Hispanic	3,584	0
Not Hispanic	8,363	0

Data Source

Comments: Multiple races 427.

Estimate the number and type of families in need of housing assistance for families with children and the families of veterans.

Please see the table above for numbers and need for families with children and families of veterans.

Describe the Nature and Extent of Homelessness by Racial and Ethnic Group.

African Americans represent the largest population of both sheltered and non-sheltered groups. Whites are second, followed by Hispanics, Asians, American Indians or Alaskan Natives, and Pacific Islanders. Non-Hispanics far surpass Hispanics in numbers. Thirty percent of both African Americans and Whites are unsheltered. The highest unsheltered group, after Non-Hispanics, is American Indians or Alaskan Natives.

Describe the Nature and Extent of Unsheltered and Sheltered Homelessness.

Every homeless population, the Homeless Needs table has more people sheltered in the most recent year compared to unsheltered except for the chronically homeless. Those unsheltered may not need shelter services to achieve housing stabilization. They may be rapidly rehoused or able to find temporary housing until more permanent housing is secured. However, having any unsheltered could suggest a dearth of services and a need for more resources to help every individual find the best situation given the person's unique circumstances.

Discussion:

Sheltered adults experiencing chronic patterns of homelessness increased by 32 percent since 2019 and represented one quarter of the overall adult population in shelter. Most adult-only households with chronic patterns of homelessness lived unsheltered before accessing homeless services in 2021.

Given that most pandemic-era protections that helped to stabilize households throughout the pandemic have ended, there is reason for concern about increases in homelessness. Data collection, like the 2023 PIT Count, shows worsening trends for both sheltered and unsheltered homelessness. Continued flexible and robust federal investment in targeted homeless assistance programs, renter protections, affordable housing, and accessible and intensive supports for low-income households will continue to prevent and end homelessness in communities across Illinois.

NA-45 Non-Homeless Special Needs Assessment – 91.305 (b,d)

Introduction

The HOPWA program provides grants to local communities, states, and non-profit organizations to benefit low-income HIV positive clients and their families. HOPWA funds may be used for a wide range of housing, social services, program planning, and development costs. These may include, but are not limited to, emergency housing, short term rental assistance, mortgage assistance, short term utility assistance, housing information and resource identification services, project and tenant based rental assistance, and emergency repairs and operating costs for housing. HOPWA funds may be used also to provide supportive services, such as health care, mental health services, chemical dependency treatment, nutritional services, case management, assistance with daily living, and other services for individuals living with AIDS.

HOPWA grantees are encouraged to develop community-wide strategies through forming partnerships with area non-profits to provide housing assistance and supportive services for eligible persons. HOPWA grantees are urged to require eligible clients to access mainstream entitlement housing and utility assistance programs before accessing HOPWA funds. HOPWA funds have assisted clients in finding safe, decent, affordable housing, and provided resources that help them prosper within the community. Rental assistance has relieved the financial burden of individuals finding themselves in economic crisis.

State of Illinois unable to input estimated unmet housing need in chart below. The following types of housing will be provided:

TBRA: 220; STRMU:45; Permanent Housing Placement: 20

Programs run by other State agencies and divisions are described in the text boxes labeled "Persons Served by Other State Agencies." Please see the images labeled "Health Care Chart 1 and 2" below to find information about Illinois' compliance with state consent decrees and the Money Follows the Person (MFP) program, as of November 2019.

HOPWA

Current HOPWA formula use:	
Cumulative cases of AIDS reported	43,415
Area incidence of AIDS	613
Rate per population	5
Number of new cases prior year (3 years of data)	1,899
Rate per population (3 years of data)	5
Current HIV surveillance data:	
Number of Persons living with HIV (PLWH)	36,413

Current HIV surveillance data:	
Area Prevalence (PLWH per population)	286
Number of new HIV cases reported last year	1,415

Table 28 – HOPWA Data

Data Source Comments:

HIV Housing Need (HOPWA Grantees Only)

Type of HOPWA Assistance	Estimates of Unmet Need
Tenant based rental assistance	0
Short-term Rent, Mortgage, and Utility	0
Facility Based Housing (Permanent, short-term or transitional)	0

Table 29 – HIV Housing Need

Data HOPWA CAPER and HOPWA Beneficiary Verification Worksheet
Source:

Describe the characteristics of special needs populations in your community:

Of the total persons served with HOPWA funds, approximately 2 percent were between the ages of 13 to 24, 33 percent were 25 to 44 years of age, 60 percent were between the ages of 45 to 64 years of age, and 5 percent were 65 or older. 50 percent were White, 40 percent were African-American, 5 percent were Hispanic, 1 percent were Native American or Alaskan Native and 4 percent were listed as Multi-Ethnic. Of the individual’s served 67 percent were male and 32 percent were female.

What are the housing and supportive service needs of these populations and how are these needs determined?

Every three years the Department's Ryan White HIV Care Connect Regions sends out a client survey to determine the housing and supportive services needs of this population. Lack of available housing and decreasing financial support to sustain housing are challenges for people living with HIV/AIDS in the Illinois HIV Care Connect Region. In the southern 17 counties of the state, there are little to no available affordable housing options, and available housing options are often of poor quality. Those most in need of housing are usually low income and formerly incarcerated individuals. Many housing providers refuse to rent to individuals with a history of felony convictions.

The shortage of affordable housing for low-income and homeless persons in the southern and rural areas in Illinois is compounded when individuals are also living with HIV/AIDS. Some of the issues that impact the ability of people living with HIV/AIDS to secure stable housing situations are travel costs and lack of local public transportation in rural areas in Illinois. Much of the region in Southern Illinois and East Central is rural. The Central Illinois region has seen the HIV/AIDS epidemic growing among

traditionally under served and hard-to-reach populations. Housing is limited and often substandard and limited in the availability of community resources. HOPWA funds have been a stronghold in maintaining affordable housing.

Discuss the size and characteristics of the population with HIV/AIDS and their families within the Eligible Metropolitan Statistical Area:

The number of AIDS cases in Illinois is one of the highest in the nation. A total of 43,415 people had been diagnosed with living with HIV/AIDS.

If the PJ will establish a preference for a HOME TBRA activity for persons with a specific category of disabilities (e.g., persons with HIV/AIDS or chronic mental illness), describe their unmet need for housing and services needed to narrow the gap in benefits and services received by such persons. (See 24 CFR 92.209(c)(2) (ii))

Discussion:

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

Other programs' details are provided in the narrative fields above

NA-50 Non-Housing Community Development Needs - 91.315 (f)

Describe the jurisdiction's need for Public Facilities:

The State of Illinois Community Development Block Grant program does not include Public Facilities programming.

How were these needs determined?

Other Illinois agencies provide funding assistance for public facilities.

Describe the jurisdiction's need for Public Improvements:

According to a March, 2024 USEPA assessment, Illinois has the 15th highest need in the nation for drinking water infrastructure improvements. Although this number has dropped from as high as 4th in the nation, the significant need is still evident. This is particularly true in the rural areas of the state that our program serves. More than 70% of the communities in Illinois have a population of less than 5,000 people and generally do not have the funding resources necessary for public infrastructure improvements. The Metropolitan Planning Council estimated in March, 2019 that Illinois must invest \$32 billion in its water infrastructure – \$17 billion in waste water projects and \$15 billion in drinking water projects – over the next 20 years to meet this need. Additionally, according to a study by the American Water Works Association, Illinois has more lead service lines than any other state in the nation.

How were these needs determined?

Total requests for the CDBG Public Infrastructure (PI) program funding in the last 5 years have consistently outpaced the amount of grant funds available. This demand, in excess of funding available has been consistent for more than two decades, signifying the importance of funds to support public infrastructure projects in Illinois. This trend will likely continue indefinitely as local communities struggle to find funding and maintain revenues.

- 2019 - \$20.3 million in requests
- 2020 - \$34.9 million in requests
- 2021 - \$28.2 million in requests
- 2022 - \$97.4 million in requests
- 2023/2024 - \$75.7 million in requests
- 2025 - \$28.7 million in requests

Applications for the Rebuild Illinois Public Infrastructure programs funded by the State of Illinois 2019 Capital Bill were administered in our office. The two opportunities were available for all communities across the state and garnered 250 and 351 applications respectively. Due to the number of applications, an additional \$25 million was appropriated in State funds in 2022. Additionally, requests for assistance from the Illinois Environmental Protection Agency far out-numbered their available funds. And as their focus has moved towards lead abatement, fewer standard water projects are being funded. Therefore we anticipate the number of CDBG Public Infrastructure applications to increase.

Describe the jurisdiction’s need for Public Services:

The State of Illinois Community Development Block Grant program does not include Public Services programming.

How were these needs determined?

Public services needs are addressed in other agencies with other funding while the State has the opportunity to utilize Community Development Block Grant funding for needs that otherwise would not be adequately addressed.

Housing Market Analysis

MA-05 Overview

Housing Market Analysis Overview:

The Housing Market Analysis (HMA) section provides information on the affordability and condition of the housing market in Illinois. Data tables were populated by HUD and use the U.S. Census' American Community Survey and the Comprehensive Housing Affordability Strategy (CHAS) 2016-2020 data sets. Data show the state has more than 5.33 million housing units, the majority of which (over 3.18 million), are homeownership units, with the majority of the state's housing stock built before 1980. With the majority of the housing units (over 3.2 million) being constructed prior to 1980, there is a great, on-going risk for lead based paint hazards. Concerning affordability, the median home value in Illinois increased 13 percent in the last five years. The median contract rent also increased by 14 percent. While these rates of increase are greatly reduced from the rates reported in 2015 (55% and 39% respectively over a ten year period) the housing market continues to grow at a rate that outpaces that of wages, and cost burdens will continue to be a concern.

The following sections will be covered in the Housing Market Analysis:

- MA-10 Number of Housing Units
- MA-15 Cost of Housing
- MA-20 Condition of Housing
- MA-25 Public and Assisted Housing
- MA-30 Homeless Facilities
- MA-35 Special Needs Facilities and Services
- MA-40 Barriers to Affordable Housing
- MA-45 Non-Housing Community Development Assets
- MA-50 Needs and Market Analysis Discussion

MA-10 Number of Housing Units – 91.310(a)

Introduction

The tables below show 2016-2020 estimates of the number and type of housing units in Illinois and the size of those units in terms of bedrooms.

All residential properties by number of units

Property Type	Number	%
1-unit detached structure	3,141,506	59%
1-unit, attached structure	305,724	6%
2-4 units	648,146	12%
5-19 units	548,369	10%
20 or more units	556,080	10%
Mobile Home, boat, RV, van, etc	135,022	3%
Total	5,334,847	100%

Table 30 – Residential Properties by Unit Number

Data Source: 2016-2020 ACS

Unit Size by Tenure

	Owners		Renters	
	Number	%	Number	%
No bedroom	10,967	0%	108,306	7%
1 bedroom	93,417	3%	429,629	26%
2 bedrooms	697,414	22%	643,592	39%
3 or more bedrooms	2,383,344	75%	451,783	28%
Total	3,185,142	100%	1,633,310	100%

Table 31 – Unit Size by Tenure

Data Source: 2016-2020 ACS

Describe the number and targeting (income level/type of family served) of units assisted with federal, state, and local programs.

Various federal, state, and local programs provide funding that is targeted toward low-income, very low income, and extremely low income families throughout Illinois. Key funding streams for affordable housing for these populations are as follows: the Low Income Housing Tax Credit (LIHTC) program, the HOME program, the (federal) Housing Trust Fund (HTF) and the Community Development Block Grant (CDBG) program.

HOME (Home Investment Partnerships Program):

Provides formula grants to states and localities that communities use—often in partnership with local nonprofit groups—to fund a wide range of activities that build, buy, and/or rehabilitate affordable housing

HTF (Housing Trust Fund):

The Housing Trust Fund funds multifamily production and rehabilitation activities to preserve and increase the supply of decent, safe affordable housing for extremely-low income households.

Community Development Block Grant Program (CDBG):

Created under the Housing and Community Development Act of 1974, this program provides Federal grant funds to local and state governments to develop viable urban communities by providing decent housing and public facilities with a suitable living environment.

Community Development Block Grant Program - Disaster Recovery

Low-Income Housing Tax Credit (LIHTC):

A tax incentive intended to increase the availability of low-income housing. The program provides an income tax credit to owners of newly constructed or substantially rehabilitated qualified low-income rental housing projects. The developments can include either multi-family or single-family rental housing.

Illinois publishes an Annual Comprehensive Housing Plan (each calendar year) that estimates the reach of these and additional funds towards housing for targeted populations. Targeted populations include: low-income households (with emphasis on households earning below 30% of area median income); low-income seniors; persons with disabilities, homeless persons and persons at risk of homelessness; low and moderate income persons unable to afford housing near work or transportation (Live Near Work); and low-income persons residing in existing affordable housing that is in danger of being lost or becoming unaffordable (Preservation); low income persons residing in communities with ongoing community revitalization efforts; other special needs populations, including people with criminal records and veterans experiencing or at risk of homelessness. Illinois also publishes an Annual Progress Report that details actual funds expended and units created for targeted populations.

Provide an assessment of units expected to be lost from the affordable housing inventory for any reason, such as expiration of Section 8 contracts.

Does the availability of housing units meet the needs of the population?

The Housing Needs Assessment and the Housing Market Analysis sections of this Consolidated Plan indicate that the available housing units do not meet the needs of many of the extremely low, very-low, low- and moderate-income residents living in Illinois.

Describe the need for specific types of housing:

There is continuing need for safe, sanitary, and affordable housing throughout Illinois. There is a need for affordable housing to households making less than 80% of the Area Median Income, especially for those households making less than 50% and 80% of the area median income. In addition, there is an ongoing need for safe, sanitary and affordable housing for seniors and supportive housing populations. With an aging population, seniors will see greater need to either age in-place or having the option to move to smaller, more low-maintenance units. There are also housing needs for persons with disabilities and persons at risk of homelessness.

Discussion

In Illinois, there is not sufficient affordable housing, nor sufficient housing stock in general. The Housing Needs Assessment and the Housing Market Analysis sections of the Consolidated Plan indicate that existing housing units do not meet the need of many of the extremely-low, very-low, and moderate-income residents living in Illinois. Many Illinois residents are cost-burdened. Households at 30% and 50% AMI continue to be the most cost-burdened, with a lack of housing units affordable to households at these income levels. Additionally, housing units that receive rental assistance such as Section 8 contracts can be at risk of being converted to market rate housing upon the maturity of the tax credits or when contracts expire. As such, the State will continue to provide and develop programs to address these ongoing needs

MA-15 Cost of Housing – 91.310(a)

Introduction

The cost of housing has increased in Illinois for both Owners and Renters across all income levels. As the cost of housing has increased, the availability of affordable units has not kept pace with evolving needs.

Cost of Housing

	Base Year:	Most Recent Year:	% Change
Median Home Value	0	0	0%
Median Contract Rent	0	0	0%

Table 32 – Cost of Housing

Data Source Comments:

Rent Paid	Number	%
Less than \$500	0	0.0%
\$500-999	0	0.0%
\$1,000-1,499	0	0.0%
\$1,500-1,999	0	0.0%
\$2,000 or more	0	0.0%
Total	0	0.0%

Table 33 - Rent Paid

Data Source Comments:

Housing Affordability

Number of Units affordable to Households earning	Renter	Owner
30% HAMFI	142,940	No Data
50% HAMFI	480,235	289,675
80% HAMFI	1,050,680	806,730
100% HAMFI	No Data	1,176,070
Total	1,673,855	2,272,475

Table 34 – Housing Affordability

Data Source: 2016-2020 CHAS

Monthly Rent

Monthly Rent (\$)	Efficiency (no bedroom)	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom
Fair Market Rent	0	0	0	0	0

Monthly Rent (\$)	Efficiency (no bedroom)	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom
High HOME Rent	0	0	0	0	0
Low HOME Rent	0	0	0	0	0

Table 35 – Monthly Rent

Data Source Comments:

Is there sufficient housing for households at all income levels?

The cost of housing has increased, especially for renters. The Needs Assessment details households with incomes below 30%, 50% and 80% of the HAMFI. (Number of Households Table). Comparing households to housing units statewide does not accurately reflect housing need, because households often do not live where the housing units they can afford exist. Additionally, units that would be affordable to low income households are often inhabited by households in higher income brackets.

How is affordability of housing likely to change considering changes to home values and/or rents?

If the trends of increasing rents and home values, coupled with wage growth that does not match these increasing costs and home values continues, then there will be an expanding gap between the number of available housing at lower income levels, and the number of families/households eligible for those affordable housing units.

How do HOME rents / Fair Market Rent compare to Area Median Rent? How might this impact your strategy to produce or preserve affordable housing?

The impact for each individual county and community varies throughout the State of Illinois as Fair Market Rents are different by county or metropolitan-statistical area. In some instances, rents are comparable: in other instances, market rate rents are more than HOME and Fair Market Rents.

Discussion

Housing Cost increases are affecting both renters and owners. This section has indicated that the supply of affordable housing does not meet the demand for residents of all incomes. Specifically, the number of extremely low-income households out-numbered the amount of affordable housing units available to this income bracket. There is continuing need for affordable rental units for this population bracket. If trends of increasing rents and home values is not offset by a like increase in wages, then there will continue to be an expanding gap between affordable housing units at lower income levels throughout the State of Illinois.

MA-20 Condition of Housing – 91.310(a)

Introduction:

Age of housing stock, cost burdens, and energy efficient technologies are just some of the outliers which effect the State's conditions of housing. To evaluate the State's current condition, this section will cover the following:

- Definitions or “standard” and “substandard condition but suitable for rehabilitation”
- Condition of units
- Year Unit Built
- Risk of Lead Based Poisoning
- Vacant Units
- Need for Owner and Rental Rehabilitation, and
- Estimated Number of Housing Units Occupied by Low or Moderate Income Families with LBP Hazards

Describe the jurisdiction's definition of "standard condition" and "substandard condition but suitable for rehabilitation":

Standard: Meets or exceeds HUD Housing Quality Standards (HQS); does not have any critical or major structural defects; has adequate plumbing and heating/cooling facilities; and its appearance does not create a blighting influence.

Substandard Condition but Suitable for Rehabilitation: Does not meet HUD HQS; has one or more major and/or critical structural defects that can be repaired for a reasonable amount. The degree of substandard is either moderate or severe according to the number of defects and the degree of deficiency

1. Moderately Substandard –less than three major defects and can be restored to a standard condition for a reasonable cost.
2. Severely Substandard –three or more major defects or at least one critical defect and can be restored to a standard condition for a reasonable cost.

Condition of Units

Condition of Units	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
With one selected Condition	0	0%	0	0%
With two selected Conditions	0	0%	0	0%
With three selected Conditions	0	0%	0	0%
With four selected Conditions	0	0%	0	0%
No selected Conditions	0	0%	0	0%
Total	0	0%	0	0%

Table 36 - Condition of Units

Data Source: 2016-2020 ACS

Year Unit Built

Year Unit Built	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
2000 or later	0	0%	0	0%
1980-1999	0	0%	0	0%
1950-1979	0	0%	0	0%
Before 1950	0	0%	0	0%
Total	0	0%	0	0%

Table 37 – Year Unit Built

Data Source: 2016-2020 CHAS

Risk of Lead-Based Paint Hazard

Risk of Lead-Based Paint Hazard	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
Total Number of Units Built Before 1980	0	0%	0	0%
Housing Units build before 1980 with children present	0	0%	0	0%

Table 38 – Risk of Lead-Based Paint

Data Source: 2016-2020 ACS (Total Units) 2016-2020 CHAS (Units with Children present)

Vacant Units

	Suitable for Rehabilitation	Not Suitable for Rehabilitation	Total
Vacant Units	0	0	0
Abandoned Vacant Units	0	0	0
REO Properties	0	0	0
Abandoned REO Properties	0	0	0

Table 39 - Vacant Units

Data Source: 2005-2009 CHAS

Need for Owner and Rental Rehabilitation

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Estimated Number of Housing Units Occupied by Low or Moderate Income Families with LBP Hazards

The State does not collect or publish readily available data on the numbers of housing units with lead based paint hazards. However, the Illinois Department of Public Health publishes annual surveillance reports on child lead poisoning prevention activities within the State. Information from the Illinois Department of Public Health 2022 Annual Report can help highlight to what degree lead based poisoning hazards are affecting households throughout the State.

Discussion:

Illinois employs a broad range of strategies to maintain and improve the supply and condition of the State's affordable housing via both federal and state programs:

1. IHDA works with DCEO to coordinate funding for both rehabilitation and new construction rental housing developments being otherwise assisted.
2. Both IHDA and DCEO work with local governments and non-profit organizations to administer local homeowner housing rehabilitation programs targeted to low/moderate –income households.
3. DCEO also works with local governments on funding and implementing local public works/infrastructure projects to address major health and safety concerns, especially of LMI households.

Public Act 95-0492 established the window replacement (CLEAR-WIN) program to prevent future cases of lead poisoning by assisting residential property owners reduce lead-paint hazards through window replacement.

MA-25 Public and Assisted Housing – (Optional)

Introduction:

The State of Illinois does not own or operate any public housing as a public housing authority. Accordingly, the State does not expect to play a management role in encouraging residents of public housing to become more involved in the management of public housing. All public housing authorities are required by HUD to have Resident Councils or Advisory Boards. They are also required to have a resident serving as a member on their Board of Commissioners. The Council/Advisory Board must review and comment on the Public Housing Authority's Annual Agency Plan prior to submittal to HUD. With passage of the Quality Housing and Work Responsibility Act of 1998, states have a more defined role in working with local Public Housing Authorities. Upon local request, the State can provide outreach and technical assistance in an effort to better assess and evaluate options for improving operations, resolving non-compliance problems, and identifying other housing-related needs and issues

Totals Number of Units

	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project-based	Tenant-based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
# of units vouchers available	1	1,675	55,383	97,009	2,456	79,674	4,048	5,795	9,345
# of accessible units			105						

*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition

Table 40 – Total Number of Units by Program Type

Data PIC (PIH Information Center)

Source:

Describe the supply of public housing developments:

Describe the number and physical condition of public housing units in the jurisdiction, including those that are participating in an approved Public Housing Agency Plan:

While IHDA attempts to work with Housing Authorities to voluntarily provide Public Housing/Housing Choice Voucher numbers for its PHA Plan for its PHA Agency Plan Reviews, it can do this only for those PHAs which are in Community Development Block Grant (CDBG) Non-entitlement areas.

Describe the Restoration and Revitalization Needs of public housing units in the jurisdiction:

Not available on a statewide basis.

Describe the public housing agency's strategy for improving the living environment of low- and moderate-income families residing in public housing:

Not Applicable. While IHDA attempts to work with Public Housing Authorities to voluntarily provide Public Housing/Housing Choice Voucher numbers for their PHA Plans for their PHA Agency Plan Reviews, IHDA can do this only for those PHAs which are in Community Development Block Grant (CDBG) Non-entitlement areas, and only in those years when they are applying for a Certificaton of Consistency with the Consolidated Plan.

Discussion:

IHDA continues to work with Public Housing Authorities on mixed financed projects and Rental Assistance Demonstration (RAD) conversion projects

MA-30 Homeless Facilities – 91.310(b)

Introduction

This section contains information about the number and types of beds available to the State's homeless population and a description of services provided to the homeless. There is also a description of services targeted to specific homeless populations.

Facilities Targeted to Homeless Persons

	Emergency Shelter Beds		Transitional Housing Beds	Permanent Supportive Housing Beds	
	Year Round Beds (Current & New)	Voucher / Seasonal / Overflow Beds	Current & New	Current & New	Under Development
Households with Adult(s) and Child(ren)	10,044	0	1,804	11,181	0
Households with Only Adults	0	0	0	0	0
Chronically Homeless Households	0	0	0	0	0
Veterans	0	0	0	0	0
Unaccompanied Youth	0	0	0	0	0

Table 41 - Facilities Targeted to Homeless Persons

Data Source Comments: Beds aren't broken down per demographics or special population. Total Emergency Shelter Beds 10,044; Transitional Housing Beds 1,804; Permanent supportive housing beds 11,181.

Describe mainstream services, such as health, mental health, and employment services to the extent those services are used to complement services targeted to homeless persons

Every CoC listed numerous resources the CoC provides itself or in partnership with local agencies, CoC members, and healthcare systems to ensure individuals experiencing homelessness access any and all mainstream benefits they need. These services listed include healthcare systems, local clinics, mental health organizations, substance use services, employment resources through regional workforce development and job training, legal aid, transportation, veteran services, life skills, and childcare. Several CoCs require and provide SOAR training for provider grantees.

List and describe services and facilities that meet the needs of homeless persons, particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth. If the services and facilities are listed on screen SP-40 Institutional Delivery Structure or screen MA-35 Special Needs Facilities and Services, describe how these facilities and services specifically address the needs of these populations.

Continua of Care often prioritize chronic and/or veterans homelessness, especially for their permanent supportive housing and use RRH for families with children. Central Illinois' CoC, Lake County's CoC, Rockford/Winnebago/Boone/DeKalb's CoC, and Will County's CoC have all effectively ended veterans homelessness. Rockford and its county partners has also ended chronic homelessness, with Will County's CoC ending chronic family and chronic veterans homelessness. Both Suburban Cook and Lake County CoCs are undertaking the Built for Zero initiative to attempt to effectively end veterans and chronic homelessness. While many CoCs are targeting certain subpopulations and effectively ending homelessness for these subpopulations, other CoCs are focused on providing excellent services to the unique needs of these subpopulations. They use PIT survey tools, established agency partnerships, task forces, workgroups, and program policies to get closer to ending homelessness.

MA-35 Special Needs Facilities and Services – 91.310(c)

Introduction

The Illinois Department of Public Health administers the HOPWA Program. Funds are distributed to eight local HIV Care Connect Regions. Funds are provided for short-term rent, mortgage (STRMU), Tenant Based Rental Assistance (TBRA), utility assistance, housing information services and resource identification services were used in the HIV Care connect regions. The prevention of homelessness is the most important element of administering the HOPWA program. Persons living with HIV require stable housing in order to receive effective treatment. To ensure those most in need receive services, the Illinois HOPWA program also limits its housing and utility assistance program to persons with HIV/AIDS at or under 80% Area Median Income. A client must have an emergency which places him or her at-risk of homelessness. STRMU is "needs based" and intended for clients who are temporarily unable to meet their monthly housing and utility expenses due to an unexpected situation. TBRA will be used by the 8 Ryan White Lead Agents to provide stable long-term assistance.

For more information about other state agencies and divisions' programs that serve special need populations, see Needs Assessment section 45.

HOPWA Assistance Baseline Table

Type of HOWA Assistance	Number of Units Designated or Available for People with HIV/AIDS and their families
TBRA	1,595
PH in facilities	0
STRMU	120
ST or TH facilities	0
PH placement	80

Table 42 – HOPWA Assistance Baseline

Data Source Comments:

To the extent information is available, describe the facilities and services that assist persons who are not homeless but who require supportive housing, and programs for ensuring that persons returning from mental and physical health institutions receive appropriate supportive housing

Stable Housing continues to be important, to ensure that appropriate housing services are provided to persons living with HIV/AIDS. Funds are used to provide housing and support services to ensure that a wide variety of health and social services are provided. The primary goals of the use of funds for housing facilities is to provide medical and other supportive services such case management, mental health counseling and substance abuse treatment to persons living in designated housing facilities. The Department directly funds eligible AIDS designated housing facilities within the Illinois HOPWA

jurisdiction area. These funds are being used for the provision of meals and lodging to residents, for repairs and operating costs. The following housing facilities in the Illinois HOPWA area: Alexian Brothers the Harbor, Waukegan, Illinois, Asian Human Services, Chicago, Illinois, Fifth Street Renaissance, Springfield, Illinois, Greater Community AIDS Project, Champaign, Illinois.

Describe programs for ensuring that persons returning from mental and physical health institutions receive appropriate supportive housing

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Specify the activities that the jurisdiction plans to undertake during the next year to address the housing and supportive services needs identified in accordance with 91.215(e) with respect to persons who are not homeless but have other special needs. Link to one-year goals. 91.315(e)

IDPH allocates HOPWA and Ryan White funds to HIV CARE Connect Regions for specific eligible activities. HIV Care Connect Regions hold quarterly meetings to review and address the housing and supportive service needs and recommend activities. Emergency housing and financial assistance is a coordinated effort between funding sources. Ryan White Part B Housing Assistance is part of the Emergency housing and financial assistance but is regulated for compliance by U.S Health Resources and Services Administration. Both programs work together to assist clients with housing needs during temporary times of financial need designed to prevent homelessness and increase housing stability. Ryan White Part B provides HIV case managements services to assist those living with HIV disease with the coordination of a wide variety of health and social services.

For entitlement/consortia grantees: Specify the activities that the jurisdiction plans to undertake during the next year to address the housing and supportive services needs identified in accordance with 91.215(e) with respect to persons who are not homeless but have other special needs. Link to one-year goals. (91.220(2))

The Illinois Department of Public Health is the grantee for the Housing Opportunity for persons with AIDS program and the Ryan White Comprehensive AIDS Resources Emergency (CARE) program. The Ryan White Program primarily funds activities such as case management, support groups, counseling, healthcare, nutrition services, dental assistance, and legal services. The Ryan White Care Program coordinates services to ensure that those who are most in need receive and are linked to care. Short term rent, mortgage, and utility assistance, TBRA, and Permanent housing Placements will continue to be provided to the HIV Care Connect Region. The State HOPWA program launched a long-term housing project in the Winnebago county area to address the on-going need for rental assistance for persons living with HIV/AIDS. The STRMU assistance program alone does not address the housing needs of many of the HOPWA clients served, who are now living a lot longer. Housing is integral to containing the HIV epidemic by ensuring that low-income often multiply diagnosed people living with HIV are in a safe living environment.

MA-40 Barriers to Affordable Housing – 91.310(d)

Negative Effects of Public Policies on Affordable Housing and Residential Investment

The narrative below provides detail on the following identified barriers:

1. Building Codes
2. Home Rule
3. Impact Fees
4. Property Taxes
5. Cost and Availability of Land
6. Availability of Affordable and Accessible Housing
7. Public Housing
8. Preservation
9. Homelessness
10. Other Special Needs

1 Building Codes

Elimination/Removal of Barriers to Affordable Housing

Illinois is a wildly assorted state, having the largest number of local governments in the country. According to a 2005 Rural Research Report from IIRA, entitled "Governmental Structure in Illinois," it had 1,251 municipalities, 1,433 townships, 102 counties, and 3,681 special taxing districts. This was updated by the ILGA Legislative Research Unit in May of 2015 to now reflect a total of 6,953 total local governments in Illinois. As of April 2018, the Illinois State Comptroller listed the number as 8,529. While this is not a barrier per se, the network of local government authorities and approval requirements must be evaluated by both non-profit and for-profit affordable housing developers as well as public agencies when pursuing any such projects or programs.

The related regulatory environment is also of note. Here are some major facets of it:

1) Building Codes While there is not a State statutory building code, the Illinois Municipal Code sets general parameters for local Comprehensive planning, zoning, and building codes. Furthermore, there are nearly a dozen State laws impacting local governments in specific areas, including plumbing, stormwater, septic systems, lead poisoning prevention, asbestos abatement, manufacturing living, physical and infrastructural barriers, and historic preservation. These various State laws/regulations or local ordinances serve legitimate public health and safety concerns as well as sound public management practices. All laws construed by an individual or group as discriminatory or excessive are also open to court challenge under federal fair housing laws as well as the Illinois Human Rights Act.

2. Home Rule

2) Home Rule Another State public policy with an impact on the affordability of housing, and thus has potential for impacts on affordable housing development, is Home Rule. Under the Illinois Constitution of 1870, a unit of local government had only those powers specifically granted to it by the Constitution or by statute. The Constitution of 1970 modified this provision by granting home rule status to counties that have a chief executive officer elected by the voters of the county (only Cook County qualifies) and municipalities with a population of more than 25,000. Other municipalities may elect, by referendum, to become home rule units. Home rule units have broad powers including the power to regulate for the protection of public health safety, morals and welfare; to license; to tax; and to incur debt. Aside from several limitations specified in the Constitution and any limitations that the Legislature may enact by law, power of Home Rule are to be construed liberally. This locally invested authority directly affects the intergovernmental aspects of structuring policies that affect the provision of affordable housing.

Given Home Rule status, much public policy affecting affordable housing development emanates from the local level. Home Rule units are responsible for zoning, building codes, comprehensive planning, and many other land use controls that have a direct impact on the provision of affordable housing. According to the Illinois Municipal League, as of April 2015, there were 211 home rule units of local government in Illinois – plus the one Home Rule County in Illinois: Cook County.

There is also a Home Rule Note process in the Illinois General Assembly, which allows any legislator (bill sponsor or otherwise) to request such a note for a particular bill from the Illinois Department of Community and Economic Opportunity (DCEO), regarding determination of its applicability to home rule jurisdictions. Home rule authority, however, can provide a municipality with additional power to encourage affordable housing, such as inclusionary zoning ordinances and establishment of housing trust funds.

3. Impact Fees

3 Impact Fees: The establishment of impact fees for new development at the local level can also be a cost barrier, as it generally levies fees on the developer of the property to pay for the needed public infrastructure improvements (water, sewer, streets, parklands, etc.) as well as other public service costs (schools, police, fire, etc.). While it can be reasonably argued that such fees are equitable and that costs for new development should not be assessed to all residents of the community, there are a few related problems. One is that there is no current statutory control or ceiling on such costs, as they are now set by local ordinance. Furthermore, these costs are generally passed on to the homebuyers/homeowners/rental property owners of the new development. These additional costs can significantly add to the affordability problem.

4. Property Taxes

4 Property Taxes: State and local taxes generate revenue to help support a broad range of public facilities and services. While not specifically directed to the development of affordable housing, tax law and policy can also facilitate, or hinder the development of such housing. Local and State sales tax exemptions on building materials incorporated into rehabilitated real estate similarly can facilitate the development of affordable housing. State and local tax law and policy can also discourage residential rehabilitation. Owners may be reluctant to make improvements in property because the improvements will increase real estate taxes. Frequently, there are low rates of return on rehabilitated low-income housing. Without tax credits or other public subsidies, the development often will not occur.

A reliance on local property taxes as funding for schools and other services ties the fiscal interest of the jurisdiction to the types of housing it allows. As a result, jurisdictions may be unwilling to zone for and/or approve affordable housing development, particularly multi-family rental developments containing large units for families.

Local governments also have been under specific statutory property tax caps for several years which limit local options on raising additional tax revenue for public improvements

5. Cost and Availability of Land

5 Cost and Availability of Land: Particularly in the City of Chicago's metropolitan areas, where the market rate cost of raw or developed land is prohibitively expensive, it is often the case that the development of affordable housing is made difficult, or even infeasible by high land costs. High land costs can be a barrier to affordable housing as the restricted rent levels or low for-sale prices often make the development of affordable housing infeasible and difficult. Largely "built out" communities have high land costs and have long been the norm, but, in recent years, other areas of the state have experienced similar land cost issues. The cost of vacant land has seen a significant upswing in costs in recent years.

It should also be noted that "available land" also needs to be fully evaluated for physical and infrastructural factors due to past usages, as remediation costs may make a site infeasible for affordable housing.

6. Availability of Affordable and Accessible Housing

Availability of Affordable and Accessible Housing: While not a barrier per se, the demand for affordable rental housing is evident and documented by renter waiting lists at assisted properties. This is true of most IHDA assisted properties, HUD Section 8/202/811 rent assisted properties, USDA Rural Development Section 515 properties, and privately-financed affordable housing. IHDA sees this regularly in its site and market studies, ongoing asset management site visits, and reviews of PHA agency plans in non-Entitlement areas. In addition, there is an ongoing need for a larger volume of available, accessible rental housing that is affordable. While federal and State statutes provide for the inclusion of accessibility provisions and housing units under most funding and assistance programs, most particularly

the national Housing Trust Fund, it is still a growing need among both persons with disabilities and the elderly populations. Unfortunately, since many in these populations are on fixed or limited incomes (SSI/SSDI as examples), the need for rental assistance is crucial. Most PHAs with Housing Choice Vouchers Programs and Project Based Vouchers/Project Based Rental Assistance also have extensive renter waiting lists. Finally, affordable homeownership is frequently unavailable without some type of public subsidy, especially for first-time homebuyers. Lower interest rates, extended terms, and downpayment/closing cost assistance are frequently needed to make homeownership a reality

7. Public Housing

The State of Illinois has over 100 public authorities (PHAs). State law authorizes all counties as well as municipalities over 25,000 in population to form a PHA. In Illinois, most of these PHA's operate both public housing and Housing Choice Voucher Programs, About a third only own and operate public housing, and about then percent of Illinois PHAs operate only HCV programs. All of these local housing agencies are primarily dependent on federal (HUD) funding, including operating subsidies (currently funded @ 70% of eligibility) and capital fund grants. There is an industry produced backlog of estimated from \$30 Billion to possible \$70 Billion in needed public housing repairs.

8. Preservation

8 Preservation There is an ongoing need to provide refinancing and rehabilitation funding to existing affordable rental housing, especially those with long-term rental assistance contracts. These projects are competing for limited funding with new developments.

The State should seek to bring down the cost of development, reduce the ongoing cost of operations and assure the deployment of a range of housing types

9. Homelessness

9 Homelessness: Obstacles to meet identified needs have historically been the need to identify unavailable or inadequate services and ongoing funding to fully implement them. The major obstacles of homeless service agencies are being able to maintain an adequate staffing level of services and staff to serve a population with a wide diversity of social/personal problems and program/service needs. Another common obstacle is the need for and the relative capacity of rental assistance resources for homeless tenants. Another major barrier is overcoming community/neighborhood opposition to the citing/location of such projects, especially multi-unit structures and emergency shelters, through public education.

Through the Continuum of Care planning approach, the Illinois Department of Human Services has worked jointly with HUD and local governments, non-profit corporations, faith-based organizations, volunteer groups and others to identify a comprehensive approach to dealing with homelessness regionally and on a statewide basis of coverage.

10. Other Special Needs

10 Other Special Needs: Many special needs populations have the dual problem of needing both specialized services and specific design features as well as affordable housing and rental assistance. The availability of an adequate supply of service-enriched housing, along with the supply of fully accessible housing for all persons with disabilities, is a large obstacle. Typical services needs include:

- Mental health services
- Addiction recovery/rehabilitation services
- Developmental disabilities services
- Medical/health services and screening
- Daily living services

The latter may include child and/or adult day care, transportation, housekeeping, congregate meals, and similar services. Having adequate services and ongoing funding available to maintain these special populations in this affordable housing are both crucial to housing special needs populations. There is also a common need for rental assistance to serve the disabilities population.

Similar to homeless and other affordable housing developments, there frequently is community/neighborhood opposition to the development of such special needs housing projects, both multi-unit and group homes. The major obstacle here again is often public education

MA-45 Non-Housing Community Development Assets -91.315(f)

Introduction

The Illinois Economic Development Plan has identified the state's Key Strengths and Challenges. Key Strengths stem from Illinois dynamic economy; Illinois must continue to sustain – and better capitalize on – these strengths to promote a prosperous and resilient economy. Challenges reflect weaknesses that must be addressed to increase economic opportunities and better prepare residents to capitalize on these opportunities. These factors shape the infrastructure and workforce needs of the state.

Strengths identified by the plan include:

- *Highly Productive Workforce*: Illinois ranks in the top ten states in economic output per hour worked and its workforce is better educated than those in most competitor states
- *Top Colleges and Universities*: Illinois boasts two of the top ten universities in the country and elite engineering, business and medical programs that give Illinois businesses access to high-end research and talent.
- *Center of Transportation and Trade*: Illinois position on the map and intermodal transportation assets – notably including O'Hare Airport, the Mississippi River, the rail freight hub of Chicago, and a robust interstate highway network – provides logistics employment and gives employers excellent access to goods, services, and workers.
- *Abundant Agriculture and Natural Resources*: Illinois' natural resources fosters rich agribusiness opportunities and promotes tourism and quality of life.

Weaknesses identified by the plan include:

- *Outmigration*: Illinois has experienced outmigration in recent years. One particular area of concern is the recent unfavorable trends in young people leaving the state after graduating high school or college.
- *Inequality*: Income inequality by race is a significant concern, as is poverty in rural areas. Illinois must address wage gaps, housing segregation, educational opportunities in struggling communities, and related issues to make prosperity available to people in forgotten areas of the state.
- *Indistinct Industry Strengths*: The flip side of Illinois' economic diversity is that the state has a well-known brand for only a few sectors. This can make it challenging to attract investment and top talent in high-growth sectors in which Illinois should be competitive.

- *Lagging Commercialization of R&D:* Despite notable educational and scientific strengths, Illinois lags in R&D and entrepreneurship.
- *History of Fiscal Imbalances:* Illinois has a long-term fiscal problem that was significantly aggravated by a budget impasse from 2015-2017 and is currently being aggravated by the COVID crisis. This creates pressure on property taxes and fiscal uncertainty that discourages investment.
- *Unresponsive Bureaucracy:* Government processes are sometimes difficult for smaller companies to navigate. This create barriers to job creation and aggravates inequality, as Small and mid-sized businesses are disproportionately owned by women, minorities, or people with disabilities

Economic Development Market Analysis

Business Activity

Business by Sector	Number of Workers	Number of Jobs	Share of Workers %	Share of Jobs %	Jobs less workers %
Agriculture, Mining, Oil & Gas Extraction	64,950	24,653	1	0	-1
Arts, Entertainment, Accommodations	527,829	584,870	8	10	2
Construction	342,937	232,049	5	4	-1
Education and Health Care Services	1,466,053	1,335,598	23	23	0
Finance, Insurance, and Real Estate	463,714	380,133	7	7	0
Information	107,181	105,040	2	2	0
Manufacturing	731,486	569,208	12	10	-2
Other Services	287,651	197,378	5	3	-2
Professional, Scientific, Management Services	786,872	966,936	13	17	4
Public Administration	233,544	209,824	4	4	0
Retail Trade	658,806	585,287	10	10	0
Transportation and Warehousing	434,186	347,365	7	6	-1
Wholesale Trade	175,238	288,517	3	5	2
Total	6,280,447	5,826,858	--	--	--

Table 43- Business Activity

Alternate Data Source Name:
2022 ACS 5 year figures

Data Source Comments: Used 2022 ACS 5yr figure for number of workers to make it comparable with the latest (2022) LEHD figure for number of jobs

Labor Force

Total Population in the Civilian Labor Force	6,642,661
Civilian Employed Population 16 years and over	6,329,130
Unemployment Rate	4.72
Unemployment Rate for Ages 16-24	8.20
Unemployment Rate for Ages 25-65	3.89

Table 44 - Labor Force

Alternate Data Source Name:

2023 ACS

Data Source Comments: Used 2023 ACS

Occupations by Sector	Number of People
Management, business and financial	1,196,328
Farming, fisheries and forestry occupations	17,804
Service	990,789
Sales and office	1,206,824
Construction, extraction, maintenance and repair	413,102
Production, transportation and material moving	928,826

Table 45 – Occupations by Sector

Alternate Data Source Name:

2023 ACS

Data Source Comments: Used 2023 ACS

Travel Time

Travel Time	Number	Percentage
< 30 Minutes	3,091,027	58%
30-59 Minutes	1,720,450	32%
60 or More Minutes	543,357	10%
Total	5,354,834	100%

Table 46 - Travel Time

Alternate Data Source Name:

2023 ACS

Data Source Comments: Used 2023 ACS

Education:

Educational Attainment by Employment Status (Population 16 and Older)

Educational Attainment	In Labor Force		Not in Labor Force
	Civilian Employed	Unemployed	
Less than high school graduate	336,389	30,364	203,026
High school graduate (includes equivalency)	1,058,956	65,317	401,567
Some college or Associate's degree	1,367,166	64,531	302,525
Bachelor's degree or higher	2,324,910	55,583	281,949

Table 47 - Educational Attainment by Employment Status

Alternate Data Source Name:

2023 ACS

Data Source Comments: Used 2023 ACS

Educational Attainment by Age

	Age				
	18–24 yrs	25–34 yrs	35–44 yrs	45–65 yrs	65+ yrs
Less than 9th grade	14,818	29,555	63,240	164,954	130,689
9th to 12th grade, no diploma	103,806	56,630	78,856	176,544	122,520
High school graduate, GED, or alternative	411,424	372,894	343,448	812,388	675,285
Some college, no degree	358,062	305,206	301,103	591,847	446,826
Associate's degree	68,814	133,344	141,136	267,724	162,433
Bachelor's degree	165,292	534,225	427,346	653,573	368,337
Graduate or professional degree	14,850	250,370	323,275	477,508	299,740

Table 48 - Educational Attainment by Age

Alternate Data Source Name:

2023 ACS

Data Source Comments: Used 2023 ACS

Educational Attainment – Median Earnings in the Past 12 Months

Educational Attainment	Median Earnings in the Past 12 Months
Less than high school graduate	34,096
High school graduate (includes equivalency)	40,285
Some college or Associate's degree	46,555
Bachelor's degree	71,127
Graduate or professional degree	86,416

Table 49 – Median Earnings in the Past 12 Months

Alternate Data Source Name:

2023 ACS

Data Source Comments: Used 2023 ACS

Based on the Business Activity table above, what are the major employment sectors within the state?

- Education and Healthcare Services - 23%
- Professional, Scientific and Management Services - 17%
- Arts, Entertainment, Accommodations - 10%
- Manufacturing - 10%
- Retail Trade - 10%

Describe the workforce and infrastructure needs of business in the state.

Over the past few years, the federal government has passed the IIJA, the CHIPS and Science Act, and the Inflation Reduction Act (IRA). Combined, these laws provide a once-in-a-generation opportunity to build infrastructure, establish new organizations and facilities for R&D, and spur billions in new investment and innovation in clean energy and semiconductor manufacturing. Almost all of the opportunities for funding in these laws are highly competitive, and many require extensive collaboration between government at the state and local level, higher education, research and community-based nonprofits, and the private sector.

To maximize the potential benefits Illinois can receive from these new federal opportunities, several laws have been passed and workforce training programs have been implemented. These include:

- Climate and Equitable Jobs Act - CEJA establishes 13 hubs to train workers and support contractors for jobs in the clean energy sector.
- A renewed focus on career and technical education (CTE) in high schools - Illinois has more than 90,000 students enrolled in CTE programs across the state.
- More students in Illinois have access to college today, thanks to an increase in Monetary Award Program (MAP) grants from \$401 million in 2019 to \$701 million in 2024. As of the 2023-24 school year, for the first time in history, every eligible MAP grant applicant received one.
- Illinois' teacher pipeline grant program brought 5,384 new teachers into the field in 2023.
- Apprenticeship Illinois - Businesses can receive as much as \$5,000 in tax credits per apprentice they employ.
- To promote work in the construction trades, the Illinois Works Pre-Apprenticeship Program, the largest state-funded pre-apprenticeship system in the country.
- Job Training for Economic Development Program (JTED) - This program provides job training services to unemployed or underemployed individuals,

Describe any major changes that may have an economic impact, such as planned public or private sector investments or initiatives that have affected or may affect job and business growth opportunities during the planning period. Describe any needs for workforce development, business support or infrastructure these changes may create.

The State offers support to entrepreneurs starting businesses, both through access to capital and through support services from Small Business Development Centers (SBDCs) and APEX Accelerators. Over the past few years, the State has considerably expanded on these services, adding 14 SBDCs since 2019, representing a 47% increase. The State has also increased the amount of loans going out through its Advantage Illinois loan program. In 2023, the State provided 148 low-interest loans through its Advantage Illinois program totaling \$36.6 million, the most since the program's launch. This credit support resulted in \$125.6 million in total project financing for Illinois small businesses. Nearly 70% of all loans were provided to businesses owned by people of color, women or veterans. In 2024, the State started a new Advantage Illinois Loan Guarantee Program to increase the capital options available to small businesses, as well as the Illinois Innovation Venture Fund (INVENT), a \$114 million direct state backed capital program. Through this state venture fund, Illinois is providing growth capital investments to companies that are committed to growing in Illinois and having difficulty raising capital they need to grow their business.

Through the Business Interruption Grant (BIG) and Back to Business Grant (B2B) programs, Illinois provided an unprecedented amount of support to small businesses in sectors hardest hit by the COVID-19 pandemic. Thanks to unprecedented levels of outreach and technical assistance deployed through a community navigator network of over 100 community-based organizations supported by State grants, the State was able to provide support to even the most hard to-reach businesses. This grant funding for small businesses reached every corner of the state – over 80% of funds went to the smallest businesses with under \$1 million in revenue.

How do the skills and education of the current workforce correspond to employment opportunities in the state?

Six principles, reflecting lessons learned over time, guide Illinois workforce development strategy and ensure that training effort meet the need of workers and businesses. In addition, the workforce needs of the priority sectors as identified in the Economic Development plan are emphasized.

- Workforce development efforts must support the industries and occupations targeted at the state and regional levels while responding to the needs of local employers.
- Building a pool of job seekers and workers with the right skills at the right time is essential if Illinois business and workers are to compete in the global economy today and in the future.

- Our job creation efforts must be statewide and extend to employers of all sizes. Effective economic development strategies are needed in urban and rural areas alike and must also recognize that almost two-thirds of the nation’s private sector workforce are employed by small business.
- All our investments must generate an acceptable return on investment. These returns must be measured in terms of outcomes most meaningful to Illinois residents – such as jobs, earnings, and long-term career prospects – not just in dollars spent or number of participants.
- Programs to prepare individuals for the workplace too often ignore the harsh economic realities of low-income populations. Education and training models that offer an “earn as you learn” component enable economically at-risk populations to acquire new skills while supporting themselves and their families. For others, support for childcare and transportation can mean the difference between advancing on a career pathway or remaining in poverty.
- The system-level change we envision will require that all State agencies with a stake in education, job creation, or workforce development support each other. We need to align our services, program eligibility, funding, and even basic terminology so we do not work at cross-purposes.

Describe current workforce training initiatives supported by the state. Describe how these efforts will support the state's Consolidated Plan.

Illinois has identified six essential state strategies underpinning Illinois’ commitment to engage and support all parts of the Illinois Workforce Investment Board (IWIB) education, workforce, and economic development systems.

- Strategy 1: Coordinate Demand-Driven Strategic Planning at the State and Regional Levels

The IWIB has a demand-driven strategic planning process grounded in strong partnerships across education (secondary and postsecondary), workforce and economic development at the State, regional and local levels.

- Strategy 2: Support Employer-Driven Regional Sector Initiatives

The IWIB continues to guide this important work to ensure investment in resources and promotion of skills and careers in targeted industry and high demand occupations.

- Strategy 3: Provide Economic Advancement for All Populations through Career Pathways

State and regional sector initiatives will provide the foundation for sector-based career pathway initiatives that expand career and educational opportunities for students and workers, including those facing multiple barriers to employment to achieve economic advancement.

- Strategy 4: Expand Service Integration

Defined as “a combination of strategies to align and simplify access to one-stop center services and supports for employers, job seekers, and workforce professionals within the system,” the goal of service integration in Illinois is to provide the best experience possible for all WIOA customers.

- Strategy 5: Promote Improved Data-Driven Decision Making

Partner agencies will design, develop and use the statewide public-private data infrastructure (see Strategy 6, below) to provide both employers and job seekers with information and tools to promote and access job openings, review changing labor market trends and opportunities, identify funding opportunities and fund education, training and support services.

- Strategy 6: Advance Public-Private Data Infrastructure

Focusing on the IWIB Vision, the board will ensure measures are implemented that will guide Illinois through sustainable, systemic change. It will expand and improve the Illinois public-private data infrastructure to support the five strategies described above. This requires the integration of labor market information with State education and workforce longitudinal data systems, as well as program and case management systems.

Describe any other state efforts to support economic growth.

Illinois’ business attraction strategy is focused on providing job creators what they need for their businesses to thrive here, including:

- World-Class Sites Large parcels with ease of access to utilities,, strategically located near transportation infrastructure, suppliers, customers and workers, and that can be ready within a reasonable timeframe.
- Skilled Workforce Workers with the experience and talent to meet employers’ needs, and CTE or community college training programs to upskill workers as required.
- High-Quality Customer Service A unified economic development team of state and local partners to support businesses to problemsolve and leverage government resources.
- Strategic Incentives For businesses that pose the highest potential for current and future jobs and investment, it’s sometimes the case that they can solicit competitive incentive packages from multiple states. If our advantages of worldclass sites, skilled workforce, and high-quality customer service are not enough to win, the State strategically deploys incentives to bring well-paying jobs and large investments to Illinois.

Discussion

MA-50 Needs and Market Analysis Discussion

Are there areas where households with multiple housing problems are concentrated? (include a definition of "concentration")

In this statewide analysis, locations/regions where households with multiple housing problems are concentrated is defined as counties where multiple housing problems exist at a rate of at least 10% greater than that of the State as a whole. Housing problem concentration statewide was analyzed in the context of ethnic households and household income-level in the Needs Assessment (see tables NA-15 through NA 30) Outside the core counties of the State's metropolitan areas, households with multiple housing problem concentrations are scattered in rural counties across the state.

Are there any areas in the jurisdiction where racial or ethnic minorities or low-income families are concentrated? (include a definition of "concentration")

In this statewide analysis, locations/regions where households with multiple housing problems are concentrated is defined as counties where multiple housing problems exist at a rate of at least 10% greater than that of the State as a whole.

What are the characteristics of the market in these areas/neighborhoods?

In this statewide analysis, locations/regions where households with multiple housing problems are concentrated is defined as counties where multiple housing problems exist at a rate of at least 10% greater than that of the State as a whole.

The State has not established a policy of targeting its funds within already Federally- or State-defined eligible areas of the State to more specific jurisdictions or regions. If absolute need numbers were used to determine resource allocations of programs, areas with less densely populated communities (e.g. rural areas, small cities, suburban areas with comparatively lower numbers of low and very low-income households versus total households) would be discriminated against, as most of the assistance would then go to large urban centers exclusively.

The State has identified very and extremely low-income households as one of the priority populations under the Consolidated Plan. The State also puts a high value on quality location of projects and availability of resources and access to amenities.

HUD provides CDBG funds to DCEO primarily for rehabilitation in projects in non-entitlement/non-urban areas of the State. Since the CDBG program does limit the ability to utilize CDBG funds for housing beyond housing rehabilitation, the Illinois Department of Commerce and Economic Opportunity, as administrator of CDBG, targets CDBG funds to eligible low-income owner-occupied households in non-entitlement/non-urban areas of the State. Under the HOME Program, IHDA expends the majority of its

HOME Program funding for rental housing through its rental housing development program. To some extent, the expenditure of CDBG, HOME, Housing Trust Fund (HTF) and other program funds on housing programs is driven by the market. The Authority's impact in opportunity areas within the State is limited by applications for funding in these areas, but it is interested in partnering with other community organizations. The State is also exploring opportunities to expend significant HOME funds in areas with identified concentrations of low-income and minority populations. Given the relatively small size of anticipated future HTF allocations, IHDA has not established geographic set-asides for the HTF, but strive to achieve maximum geographic diversity in its final funding decisions.

ESG is geographically dispersed to the Illinois Continuum of Care agencies

Are there any community assets in these areas/neighborhoods?

In this statewide analysis, locations/regions where households with multiple housing problems are concentrated is defined as counties where multiple housing problems exist at a rate of at least 10% greater than that of the State as a whole.

IHDA's Community Revitalization Technical Assistance Program works with small and or rural communities across Illinois free-of-charge to assist them in building upon and linking to existing planning efforts, identifying their strengths and needs within their local community and generating localized capacity by undertaking a Community Revitalization Strategy. Community Revitalization planning is incentivized in its Low-Income Housing Tax Credit (LIHTC) Program.

Are there other strategic opportunities in any of these areas?

As cited in the 2024 Illinois Economic Plan the State plans "...to invest in communities that have long suffered from disinvestment." As outlined in the plan spearheaded the Illinois Department of Commerce and Economic Opportunity (DCEO), this goal is to level and change the playing field. Initiatives include: Education for (specialized) Careers across a number of fields/industries; Improved Access for Child Care; Promoting and Providing Investments to Identified Communities; Supporting Entrepreneurs; Boosting Quality Jobs; and Increasing Grant Accessibility for businesses.

MA-60 Broadband Needs of Housing occupied by Low- and Moderate-Income Households - 91.210(a)(4), 91.310(a)(2)

Describe the need for broadband wiring and connections for households, including low- and moderate-income households and neighborhoods.

The need for broadband wiring and connections continues to be significant in Illinois. At least 2.9 million individuals in 1.3 million households in the state (roughly 28%) do not have a subscription to high-speed internet (Illinois State Digital Plan). The lack of access can be attributed to several factors including infrastructure availability, limited digital skills, or affordability of broadband subscriptions or devices.

Infrastructure and affordability represent two of the largest barriers to access for low- and moderate-income households. According to Illinois' State Digital Plan, 17% of Illinois residents report finding it difficult to afford their internet bill, while a full 9% of the state does not have access to broadband infrastructure that meet the Federal Communications Commission's (FCC's) minimum broadband speed benchmark of 100Mbps/20Mbps.

It is critical for all Illinois households to have access to, and be able to afford, a broadband connection to increase household income, access to healthcare and educational options, and maintain self-sufficiency.

Describe the need for increased competition by having more than one broadband Internet service provider serve the jurisdiction.

Listening sessions conducted in 2023 throughout the State of Illinois highlight that provider competition in rural and low-income areas is lacking. According to the FCC Broadband map, of the 4.2 million broadband serviceable locations (BSLs) in Illinois, 9% have no providers, 34% have one provider, and 33% have two providers. This lack of choice has tremendous impact on Illinoisans receiving high quality connections and service. Comments submitted during a public comment period while developing Illinois' State Digital Plan indicate that rural areas and areas with less choice receive poor maintenance service and experience higher prices, a lack of reliability, and a lack of access to newer, more stable broadband technologies, such as fiber. The International Center for Law and Economics' 2024 Update to their whitepaper "Dynamic Competition in Broadband Markets" found that Census blocks that transitioned from two to three providers experienced an increase in their maximum download speeds. They also conclude that "increased competition offers substantial benefits to consumers related to increased product choice and lower prices." By increasing choice among broadband providers, residents will benefit from competitive pricing and stronger infrastructure as providers are driven to improve their systems.

MA-65 Hazard Mitigation - 91.210(a)(5), 91.310(a)(3)

Describe the jurisdiction's increased natural hazard risks associated with climate change.

Describe the vulnerability to these risks of housing occupied by low- and moderate-income households based on an analysis of data, findings, and methods.

As the weather grows increasingly unpredictable, change calamities, such as floods and heat waves, become more common in Illinois. These natural disasters pose challenges for low-income communities.

Since the 1960s, heat waves have increased regularity. The Illinois Climate Change Assessment reports a 1 to 2-degree Fahrenheit growth over the last 120 years. According to the Climate and Urban Sustainability at the University of Illinois, precipitation and temperature are getting worse, and droughts are a lot more common. The 2021 Illinois Climate Change Assessment reports a major increase in precipitation over the last century. The amount varies by region but 2-inch rainfall days have increased over 40%. Days are becoming wetter and floods are becoming more frequent.

A study by the Center for Neighborhood Technology found that 87% of flood claims in Chicago from 2007 to 2016 came from low-income communities and households of color. Poor infrastructure and lack of access to resources are a few reasons why low-income communities experience critical flooding damage.

"If we look at it from a health lens, we are seeing a lot of differences in low-income people, especially related to heat waves and heat-related illnesses, deaths, and poor air quality. And that's impacting a lot of communities, low-income and physical and infrastructural injustice communities" noted the University of Illinois.

Strategic Plan

SP-05 Overview

Strategic Plan Overview

The Strategic Plan Overview provides information on the State’s priority needs, goals, and populations, as well as barriers to affordable housing. This section includes the State’s anticipated funding resources which will be used to meet the State’s outlined priority goals. This section also outlines homelessness, lead based paint hazard, and anti-poverty strategies.

The Strategic Plan Overview will cover the following subsections:

- SP-10 Geographic Priorities
- SP-25 Priority Needs
- SP-30 Influence of Market Conditions
- SP-50 Public Housing Accessibility and Involvement
- SP-55 Barriers to Affordable Housing
- SP-60 Homelessness Strategy
- SP-65 Lead based paint Hazards
- SP-70 Anti-Poverty Strategy
- SP-80 Monitoring

SP-10 Geographic Priorities – 91.315(a)(1)

Geographic Area

Table 50 - Geographic Priority Areas

1	Area Name:	Statewide Distribution
	Area Type:	Statewide distribution via a competitive process or on a continuous basis per program parameters
	Other Target Area Description:	Statewide distribution via a competitive process or on a continuous basis per program parameters
	HUD Approval Date:	
	% of Low/ Mod:	
	Revital Type:	
	Other Revital Description:	
	Identify the neighborhood boundaries for this target area.	
	Include specific housing and commercial characteristics of this target area.	
	How did your consultation and citizen participation process help you to identify this neighborhood as a target area?	
	Identify the needs in this target area.	
	What are the opportunities for improvement in this target area?	
	Are there barriers to improvement in this target area?	

General Allocation Priorities

Describe the basis for allocating investments geographically within the jurisdiction (or within the EMSA for HOPWA)

The State has identified very and extremely low-income households as one of the priority populations under the Consolidated Plan. The State also puts a high value on quality location of projects and availability of resources and access to amenities. HUD provides CDBG funds to DCEO primarily for

rehabilitation in projects in non-entitlement/non-urban areas of the State. Since the CDBG program does limit the ability to utilize CDBG funds for housing beyond housing rehabilitation, the Illinois Department of Commerce and Economic Opportunity, as administrator of CDBG, targets CDBG funds to owner-occupied households in non-entitlement/non-urban areas of the State.

Under the HOME Program, IHDA expends the majority of its HOME Program funding for rental housing through its rental housing development program. To some extent, the expenditure of CDBG, HOME, Housing Trust Fund (HTF) and other program funds on housing programs is driven by the market. In addition IHDA administers State-driven Community Revitalization Programs which assist communities statewide with undertaking revitalization strategies addressing vacant, abandoned, and deteriorating residential property. The State also pursues opportunities to expend significant HOME funds in areas with identified concentrations of low-income and minority populations.

Given the relatively small size of anticipated future HTF allocations, IHDA will not establish geographic set-asides for the HTF, but strive to achieve maximum geographic diversity in its final funding decisions.

The State has not established a policy of targeting its funds within already Federally- or State-defined eligible areas of the State to more specific jurisdictions or regions. If absolute need numbers were used to determine resource allocations of programs, areas with less densely populated communities (e.g. rural areas, small cities, suburban areas with comparatively lower numbers of low and very low-income households versus total households) would be discriminated against, as most of the assistance would then go to large urban centers exclusively. The State agencies administering federal and State programs will continue to make concerted efforts to provide more outreach and technical assistance (e.g. workshops) to eligible applicants to ensure that information on affordable housing, economic development and public facilities programs is available on an equitable basis.

CDBG Program grant funding is only available to communities that are not direct entitlements (receive their own direct CDBG allocation).

SP-25 Priority Needs – 91.315(a)(2)

Priority Needs

Table 51 – Priority Needs Summary

1	Priority Need Name	Affordable Housing
	Priority Level	High
	Population	Low Large Families Families with Children Elderly Rural Individuals Families with Children veterans Victims of Domestic Violence Unaccompanied Youth Elderly Frail Elderly Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities Victims of Domestic Violence
	Geographic Areas Affected	Statewide distribution via a competitive process or on a continuous basis per program paramaters
	Associated Goals	2025-2029 Permanent Housing Placement Multifamily Affordable Housing Prevent Homelessness Provide Emergency Shelter to Homeless Rapid Re-Housing of Homeless Street Outreach to Homeless
	Description	The Construction and Acquisition/Rehabilitation of multifamily affordable housing

	Basis for Relative Priority	The Market Analysis Section discusses the State's current housing stock in detail. Much of the State's housing stock was built prior to 1980 and may be in need of replacement and/or rehabilitation, including lead abatement and remediation. Both the construction and rehabilitation of renter occupied housing will help preserve and increase the number of units available to Low- to Extremely Low-Income households.
2	Priority Need Name	National Housing Trust Fund
	Priority Level	High
	Population	Extremely Low Large Families Families with Children Elderly Rural Chronic Homelessness Individuals Families with Children Chronic Substance Abuse veterans Victims of Domestic Violence Elderly Frail Elderly Persons with Physical Disabilities Persons with Developmental Disabilities Persons with Alcohol or Other Addictions Victims of Domestic Violence
	Geographic Areas Affected	Statewide distribution via a competitive process or on a continuous basis per program parameters
	Associated Goals	Single Family Owner Occupied Housing Rehabilitation Federal Housing Trust Fund
	Description	The Production and Acquisition/Rehabilitation of multifamily housing affordable to households at 30% of AMI and below
	Basis for Relative Priority	The Market Analysis section discusses the State's current housing stock in detail. The new construction and rehabilitation of renter-occupied housing serving households at 30% AMI or below will help provide and sustain the number of units available to the most vulnerable households in Illinois, provide permanent supportive housing units, as well as preserving units that are in danger of being lost from the State's housing stock inventory

3	Priority Need Name	Community and Economic Development
	Priority Level	High
	Population	Extremely Low Low Moderate Large Families Families with Children Elderly Elderly Frail Elderly Non-housing Community Development
	Geographic Areas Affected	
	Associated Goals	SingleFamily Owner Occupied Housing Rehabilitation Public Infrastructure Community & Economic Revitalization Disaster Response Program
	Description	Grant funds available through the CDBG Community Development Block Grant Program are available to non-entitlement cities and counties on a competitive basis. Assistance is available for: Housing Rehabilitation, Public Infrastructure improvements, and Community Revitalization including Economic Development. CDBG funds will also provide funds for Disaster Response on an as-needed basis for communities affected by an unforeseen event declared as a Emergency by the Governor of the State of Illinois.
	Basis for Relative Priority	There is a need for the State to provide services to non-entitlement communities based on community specific needs.
4	Priority Need Name	Special Needs
	Priority Level	High

Population	Extremely Low Low Large Families Elderly Persons with HIV/AIDS Elderly Frail Elderly Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities Persons with Alcohol or Other Addictions Persons with HIV/AIDS and their Families Victims of Domestic Violence
Geographic Areas Affected	
Associated Goals	Housing For Persons with HIV/AIDS 2025-2029 Permanent Housing Placement Prevent Homelessness
Description	Providing rental and utility assistance, Permanent housing placement services, TBRA,, transition assistance, counseling and other outreach services to persons with Special Needs, including those with HIV/AIDS.
Basis for Relative Priority	Due to the United States Supreme Court decision in Olmstead v. L.C, 527 U.S. 581 (1999) regarding the Americans with Disabilities Act of 1990, states (of which include Illinois) are transitioning individuals with disabilities out of institutional living and into the least restrictive housing available. Rental assistance and other services that assist with this special needs population, and other (such as ex-offenders, veterans, emancipated youth, frail elderly, victims of domestic violence and persons living with HIV/AIDS) is needed throughout the state

Narrative (Optional)

Governor's Executive Order 2003-18 established the State of Illinois' Comprehensive Housing Initiative on September 16, 2003, creating the Housing Task Force to improve the planning and coordination of the State's housing resources. The Comprehensive Housing Planning Act was renewed (as amended P.A. 99-0564) and extended to 2026 in legislation originally passed into law in 2016. The identification of the following eight identified populations in the Executive Order provides specificity to the State's housing priorities:

1. Low-income Households (with emphasis on households earning below 30% of area median income);
2. Low-income seniors;
3. Low-income persons with disabilities;
4. Homeless persons and persons at risk of homelessness;
5. Low and moderate- income persons unable to afford housing near work or transportation (Live Near Work); and
6. Low-income persons residing in existing affordable housing that is in danger of being lost or becoming unaffordable (Preservation);
7. Low-income people residing in communities with ongoing community revitalization effort;
8. Other special needs populations, including people with criminal records and veterans experiencing or at risk of homelessness.

SP-30 Influence of Market Conditions – 91.315(b)

Influence of Market Conditions

Affordable Housing Type	Market Characteristics that will influence the use of funds available for housing type
Tenant Based Rental Assistance (TBRA)	The limited availability of funds for the development of housing is prohibitive to the provision of TBRA.
TBRA for Non-Homeless Special Needs	HOPWA funds will provide TBRA to qualified individuals and families who are residing in a home (as a homeless prevention activity)
New Unit Production	New unit production is dependent on the availability, affordability, and suitability of the housing stock in the market area.
Rehabilitation	CDBG Housing Rehabilitation funds provide safe and healthy housing through the reduction of lead and other hazards, as well as preserving aging housing stock.
Acquisition, including preservation	Acquisition is not a priority per se, except as part of rehabilitation, revitalization, and preservation, as noted above. Further, individual State Agencies are not authorized to acquire/own real property. The Illinois Department of Central Management Services (CMS) is responsible for ownership and management of State facilities. Uses are statutorily limited and do not currently include affordable housing

Table 52 – Influence of Market Conditions

SP-35 Anticipated Resources - 91.315(a)(4), 91.320(c)(1,2)

Introduction

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

In response to the following Presidentially declared disasters-- Midwest Floods of 2008, Hurricane Ike 2008 and Hurricane Sandy 2013-- Congress made additional funding available to IL DCEO for the CDBG program as Disaster Recovery grants to rebuild the affected areas in Illinois and provide crucial seed money to start the recovery process. Illinois DCEO is in the closeout phase of administering these three CDBG-DR grants and no further grants will be issued. The Action Plans for Midwest Floods of 2008, Hurricane Ike 2008 and Hurricane Sandy 2013 can be found at the following link, where the impact and needs assessment sections contain more detail: <https://www2.illinois.gov/dceo/CommunityServices/DisasterRecovery/Pages/default.aspx>

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	28,988,172	0	0	28,988,172	115,952,688	The annual allocation for Illinois' CDBG program has decreased by \$1,385,932 or 4.5% since the last Consolidated Plan. With higher costs and less funding available, the project outcomes will decrease.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	15,688,880	19,720,057	0	35,408,938	62,755,521	IHDA operates by Grant Based Accounting. The deadline for committing program income, repayments and recaptured funds received during a program year is the date of the PJ's commitment deadline for the subsequent year's grant allocation, thus, the program income listed here is 2024 Program Income which has the same deadline as 2025 Grant Funds

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
HOPWA	public - federal	Permanent housing in facilities Permanent housing placement Short term or transitional housing facilities STRMU Supportive services TBRA	2,582,959	0	0	2,582,959	10,331,836	HOPWA funds provide short term mortgage, utility tenant based assistance, and permanent housing placements.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
ESG	public - federal	Conversion and rehab for transitional housing Financial Assistance Overnight shelter Rapid re-housing (rental assistance) Rental Assistance Services Transitional housing	5,190,081	0	0	5,190,081	20,760,324	ESG funds are used for street outreach, emergency shelter, homeless prevention, rapid rehousing, HMIS, and administration.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
HTF	public - federal	Acquisition Admin and Planning Homebuyer assistance Multifamily rental new construction Multifamily rental rehab New construction for ownership	6,654,453	0	0	6,654,453	26,617,811	Provides affordable rental housing for households at 30% AMI or below

Table 53 - Anticipated Resources

Explain how federal funds will leverage those additional resources (private, state and local funds), including a description of how matching requirements will be satisfied

HOPWA:

Generally, permanent, non-federal sources of funds that are non-refundable contributions from State or local government, or private sources, will be eligible to qualify as a matching contribution. Refer below for more specific information by program.

Acceptable Sources of HOME Match

- Local or State general revenues
- Housing trust funds
- Foundations, donations
- Program income from HODAG, RRP or UDAG only after grant closeout
- Value of waived taxes, fees, or charges
- Appraisal value of land or real property not acquired with Federal Funds
- Difference between appraised value and acquisition cost, if property is a acquired with Federal funds
- Grant equivalent of below market
- Interest rate loans to the project
- The cost of investments, not made with federal resources, in on and off-site infrastructure that is directly required for the affordable housing assisted with HOME funds • Federal Home Loan Bank grants
- Value of donated material or labor
- Direct cost of supportive services that facilitate independent living or as part of a self-sufficiency program
- Direct cost of homebuyer counseling for families that complete a HOME assisted purchase

Unacceptable Sources of HOME Match

- All federal funds, including CDBG funds, Rental Rehabilitation Program, Homeless Housing programs, Weatherization, etc.
- Value attributable to federal tax credits
- The interest rate subsidy attributable to the federal tax exemption on financing
- Investor Capital or investment in a project
- Cash or other forms of contributions from investors, applicants for, or recipients of HOME assistance or contracts
- Expenditures on Program Administration

CDBG/Community Development Block Grant Program:

The State must match all but \$100,000 of the funds received for program administration. Community Revitalization grants focusing on Economic Development must be matched (at a minimum) dollar for dollar. Housing Rehabilitation and Public Infrastructure grants do not require match but do receive a point value when leverage is contributed.

Housing Trust Fund: For the federal HTF, Projects which are able to commit other non-federal funds as part of their project financing will be given additional consideration. There is no State or local match requirements for the national HTF, but IHDA anticipates most national HTF-funded projects will be highly leveraged

ESG: Each grant recipient must supplement its Emergency Solutions Grant funds with an equal or greater amount of funds from other sources. 25% of the match must be cash. The amount available for matching fund purposes must be injected during the grant period.

Acceptable sources of ESG match are the State of Illinois DHS Homeless Prevention and Emergency & Transitional Housing Programs, Community Services Block Grant, FEMA, and any other source including any Federal source other than the ESG program. If ESG funds are used to satisfy the matching requirements of another Federal program, then funding from that program may not be used to satisfy the ESG matching requirements. Matching contributions must meet all requirements that apply to ESG funds, the funds must be provided after the date that HUD signs the grant agreement, cash contributions must be expended with the expenditure deadline and noncash contributions must be made within the expenditure deadline. The matching requirement may be met by cash contributions and/or noncash contributions.

If appropriate, describe publically owned land or property located within the state that may be used to address the needs identified in the plan

Individual State Agencies are not authorized to acquire/own real property. The Illinois Department of Central Management Services (CMS) is responsible for ownership and management of State facilities. Uses are statutorily limited and do not currently include affordable housing.

Discussion

The State's leveraging strategy includes the coordination of Low Income Housing Tax Credits (LIHTCs) with the development of housing that is affordable to low-income and moderate-income families. As the State's LIHTC allocating agency, IHDA coordinates the development of the annual Qualified Allocation Plan (QAP). Besides the program's already statutory targeting to households at 60% of area median income or below, IHDA has built a number of factors into its application scoring system to incentivize better targeting to lower income households. These include the following point categories: Rental Assistance; Larger Units; Green Building (lower utility bills); Rehabilitation (of existing housing); Community Revitalization Plans; 30% AMI Housing (10-15%); and Statewide Referral Network (SRN) units, which target 10-15% of a property's units to persons/households who are homeless/at-risk of homelessness or have a disability. All of these scoring criteria are aimed at incentivizing project applications which include deeper targeting to low-and moderate-income families.

SP-40 Institutional Delivery Structure – 91.315(k)

Explain the institutional structure through which the jurisdiction will carry out its consolidated plan including private industry, non-profit organizations, and public institutions.

Responsible Entity	Responsible Entity Type	Role	Geographic Area Served
Illinois Housing Development Authority	Government	Ownership Planning Rental	State
Illinois Department of Public Health	Government	Non-homeless special needs Planning Rental	State
Illinois Department of Commerce and Economic Opportunity	Government	Economic Development Ownership neighborhood improvements public facilities	State
ILLINOIS DEPARTMENT OF HUMAN SERVICES	Government	Homelessness Non-homeless special needs Planning public services	State
Community Action Agencies	Non-profit organizations	Economic Development Homelessness Non-homeless special needs Ownership Planning Rental neighborhood improvements public facilities public services	State
Continuum of Care Agencies	Non-profit organizations	Homelessness	Region

**Table 54 - Institutional Delivery Structure
Assess of Strengths and Gaps in the Institutional Delivery System**

The ESG program requires that the Continuum of Care organizations provide recommendations to the state for ESG funding. This concept ensures that the ESG funds are awarded to the areas where the need is the greatest and that the entire state is covered. The majority of the providers offer assistance in the way of life skills training, job interviewing skills, counseling, transportation to other mainstream services, etc. These types of assistance are offered to homeless individuals and families, at risk of homelessness individuals and families, veterans, persons with HIV, etc.

Availability of services targeted to homeless persons and persons with HIV and mainstream services

Homelessness Prevention Services	Available in the Community	Targeted to Homeless	Targeted to People with HIV
Homelessness Prevention Services			
Counseling/Advocacy	X	X	X
Legal Assistance	X	X	
Mortgage Assistance	X	X	X
Rental Assistance	X	X	X
Utilities Assistance	X	X	X
Street Outreach Services			
Law Enforcement	X	X	
Mobile Clinics	X		
Other Street Outreach Services	X	X	
Supportive Services			
Alcohol & Drug Abuse	X	X	X
Child Care	X	X	X
Education	X	X	X
Employment and Employment Training	X	X	X
Healthcare	X	X	X
HIV/AIDS	X	X	X
Life Skills	X	X	X
Mental Health Counseling	X	X	X
Transportation	X	X	X
Other			

Table 55 - Homeless Prevention Services Summary

Describe the extent to which services targeted to homeless person and persons with HIV and mainstream services, such as health, mental health and employment services are made available to and used by homeless persons (particularly chronically homeless individuals and families, families with children, veterans and their families and unaccompanied youth) and persons with HIV within the jurisdiction

Each agency is required to be a participating member of the Continuum of Care. The CoCs recommend which agencies within their Continuum should be funded and the amount of the funding. This allows the area that is covered by each CoC to be blanketed with adequate resources based on the need of the area.

Continua of care often prioritize chronic and/or veterans' homelessness, especially for their permanent supportive housing and use RRH for families with children. Central Illinois' CoC, Lake County's CoC, Rockford/Winnebago/Boone/DeKalb's CoC, and Will County's CoC have all effectively ended veterans' homelessness. Rockford and its county partners have also ended chronic homelessness, with Will County's CoC ending chronic family and chronic veterans' homelessness. Both Suburban Cook and Lake County CoCs are undergoing the Built for Zero initiative to attempt to effectively end veterans and chronic homelessness. While many CoCs are targeting certain subpopulations and effectively ending homelessness for these subpopulations, other CoCs are focused on providing excellent services to the unique needs of these subpopulations. They use PIT survey tools, established agency partnerships, task forces, workgroups, and program policies to get closer to ending homelessness.

Describe the strengths and gaps of the service delivery system for special needs population and persons experiencing homelessness, including, but not limited to, the services listed above

Five CoCs say their service providers have a strong working relationship with one another and another three CoCs emphasize the variety and scope of their service provider network. Service provider agencies are the largest strength for most CoCs. Lake County and Rockford, DeKalb, Winnebago, and Boone feel they have strong coordinated entry systems, but a more rural CoC states their system is difficult to manage because service providers are more spread out. Every CoC that provided gap analysis states a lack of funding for affordable housing and services is their major weakness.

Provide a summary of the strategy for overcoming gaps in the institutional structure and service delivery system for carrying out a strategy to address priority needs

Each HIV Care Connect Region is required to be a member of the local continuum of Care to ensure that needed services are included and provided to persons living with HIV/AIDS. HIV Care Connect members address the wide variety and growing needs of the homeless and persons living with HIV/AIDS. The IDPH HIV/AIDS section meets quarterly with the HIV Care Regions project directors and consumer representatives. This group is used as an advisory body in the use of Ryan White Part B and HOPWA funds and strategy to overcome gaps in services. In addition, an affinity session has been hosted by IDPH at its annual HIV/AIDS/STD conference to solicit public input regarding the use of funds and services that will need to be provided.

All nineteen continua of care have different strategies to address their specific gaps and improve their continuum. Some are looking at improving their HMIS data usage to identify gaps while others rely on

committees and strategic plans to identify gaps. A few continua of care are looking at ways to increase their network of providers while others are working to improve usage of existing resources.

SP-45 Goals Summary – 91.315(a)(4)

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Multifamily Affordable Housing	2025	2029	Affordable Housing	Statewide Distribution	Affordable Housing	HOME: \$50,000,000	Rental units constructed: 207 Household Housing Unit Rental units rehabilitated: 138 Household Housing Unit
2	SingleFamily Owner Occupied Housing Rehabilitation	2025	2029	Affordable Housing	Statewide Distribution	Community and Economic Development National Housing Trust Fund	CDBG: \$40,000,000	Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit: 615 Households Assisted
3	Federal Housing Trust Fund	2025	2029	Affordable Housing	Statewide Distribution	National Housing Trust Fund	HTF: \$20,000,000	Rental units constructed: 170 Household Housing Unit Rental units rehabilitated: 113 Household Housing Unit
4	Public Infrastructure	2025	2029	Non-Housing Community Development	Statewide Distribution	Community and Economic Development	CDBG: \$79,940,860	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 39970 Persons Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
5	Community & Economic Revitalization	2025	2029	Non-Housing Community Development	Statewide Distribution	Community and Economic Development	CDBG: \$25,000,000	Facade treatment/business building rehabilitation: 5 Business Jobs created/retained: 100 Jobs Buildings Demolished: 5 Buildings Other: 15 Other
6	Disaster Response Program	2025	2029	Non-Housing Community Development	Statewide Distribution	Community and Economic Development	CDBG: \$0	
7	Housing For Persons with HIV/AIDS	2025	2029	Affordable Housing Non-Homeless Special Needs		Special Needs	HOPWA: \$12,799,795	Tenant-based rental assistance / Rapid Rehousing: 1595 Households Assisted Housing for People with HIV/AIDS added: 120 Household Housing Unit
8	2025-2029 Permanent Housing Placement	2025	2029	Affordable Housing Non-Homeless Special Needs		Special Needs Affordable Housing	HOPWA: \$115,000	Other: 45 Other

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
9	Prevent Homelessness	2025	2029	Homeless	Statewide Distribution	Special Needs Affordable Housing	ESG: \$0	Homelessness Prevention: 0 Persons Assisted
10	Provide Emergency Shelter to Homeless	2025	2029	Homeless	Statewide Distribution	Affordable Housing	ESG: \$11,426,475	Homeless Person Overnight Shelter: 62500 Persons Assisted
11	Rapid Re-Housing of Homeless	2025	2029	Homeless	Statewide Distribution	Affordable Housing	ESG: \$8,825,975	Tenant-based rental assistance / Rapid Rehousing: 6000 Households Assisted
12	Street Outreach to Homeless	2025	2029	Homeless	Statewide Distribution	Affordable Housing	ESG: \$2,355,440	Other: 15000 Other

Table 56 – Goals Summary

Goal Descriptions

1	Goal Name	Multifamily Affordable Housing
	Goal Description	Increase, preserve and maintain the availability of affordable housing through the new construction and/or the acquisition /rehabilitation of affordable housing
2	Goal Name	SingleFamily Owner Occupied Housing Rehabilitation
	Goal Description	The program targets housing projects which preserve single-family, owner-occupied housing and encourages neighborhood revitalization. The goal is calculated by dividing the funds allocated by the maximum amount of grant award (currently \$650,000), rounding up to the nearest whole number, and then multiplying the result by 10 (the minimum number of homes that must be completed per award).

3	Goal Name	Federal Housing Trust Fund
	Goal Description	The federal Housing Trust Fund is an affordable housing production program to increase the supply of decent, safe and sanitary affordable housing for extremely low income Households.
4	Goal Name	Public Infrastructure
	Goal Description	<p>This program provides funding for water and sewer related activities to benefit primarily low-to-moderate income persons.</p> <p>Goal is estimated by taking the amount of annual funding divided by the grant ceiling (\$1,000,000) multiplied by the average number of persons assisted per grant (500). Goal outcomes are based on 51% LMI.</p>
5	Goal Name	Community & Economic Revitalization
	Goal Description	<p>Rural communities have a variety of unmet needs with no funding to address the challenges. This includes blighted structures that pose a health and safety hazard, crumbling sidewalks and streetscapes that make pedestrian traffic difficult, commercial facades with deferred maintenance, preservation of historic structures that tell their story, closed buildings that could be used for good purposes, and funds to keep current businesses and attract new ones. CDBG has eligible activities that provide for all of these needs, but the State of Illinois has not provided the opportunity (with the exception of Economic Development) on a regular basis. Beginning with this Consolidated Plan and the 2025 Action Plan, the State will make these activities available. In addition to filling the need, we believe we will utilize available funds faster, as Economic Development is a slow-use activity, dependent on if/when a business needs it; and the Department of Commerce and Economic Opportunity has other business assistance programs with fewer requirements.</p> <p>The goals below include an outcome of just one grantee per activity per year, though depending on requests may be more for some activities and less for others. Planned goals for each year are 1 Facade Renovation for a business, 20 jobs created for the Economic Development activity, 1 Building Demolished, and 3 "Other" Outcomes. The Other Outcomes are: 1 Community assisted with a sidewalk/streetscape activity (IDIS Matrix code #03L), 1 Renovation/Conversion of a Closed Building (IDIS Matrix code #) and 1 Non-Residential Historic Preservation activity (IDIS Matrix code #16B)</p>

6	Goal Name	Disaster Response Program
	Goal Description	This program reimburses communities that have experienced a gubernatorially-declared disaster for clean-up. As Disasters have occurred infrequently the last few years, no funding is being allocated to the program. If a Disaster should occur, funds will be reallocated from other program allocations.
7	Goal Name	Housing For Persons with HIV/AIDS
	Goal Description	The Illinois Department of Public health administers the HOPWA Program. Funds are distributed to eight HIV Care Connect Regions which includes of the Chicago. Funds will provide TBRA, PHP and mortgage to qualified individuals and families who are residing in a home (as a homeless prevention activity). Ryan White Part B will be used to provide emergency rent and utility assistance. Number of people with HIV/AIDS at or below 80 percent area medium income.
8	Goal Name	2025-2029 Permanent Housing Placement
	Goal Description	This activity is to assist clients who are eligible with security deposits, first and last months rent, and other initial costs.
9	Goal Name	Prevent Homelessness
	Goal Description	Reduce the number of families and individuals who become homeless for the first time. ESG will not be funding Homeless Prevention within all 5 Years of this plan. The State of Illinois non-federal Homeless Prevention funds will provide and/or supplement funding within this category.
10	Goal Name	Provide Emergency Shelter to Homeless
	Goal Description	Provide funding for operating costs and services in homeless shelters in Illinois.
11	Goal Name	Rapid Re-Housing of Homeless
	Goal Description	The goal for the State is to reduce the average length of time persons are homeless and reduce the number of families and individuals who are homeless.

12	Goal Name	Street Outreach to Homeless
	Goal Description	Provide street outreach services to reduce the number of unsheltered homeless.

Estimate the number of extremely low-income, low-income, and moderate-income families to whom the jurisdiction will provide affordable housing as defined by HOME 91.315(b)(2)

In reference to the Goal Outcome Indicator above, the estimated number of extremely low, low- and moderate-income families to whom the jurisdiction will provide affordable housing for CDBG, HOME and NHTF are as follows:

HOME: 172 units @ 31% - 50% and 173 units at 51% - 60%.

National Housing Trust Fund 283 units @ <30%

For CDBG: 615 households assisted 2025-2029

For HOPWA: 880 households under 80% AMI assisted 2025-2029

For ESG individuals assisted 2025-2029: 62,500 Emergency Shelter; 15,000 Street Outreach; 6,000 households Rapid Rehousing. ESG will not be funding Homeless Prevention within all 5 Years of this plan. The State of Illinois non-federal Homeless Prevention funds will supplement funding within this category.

SP-50 Public Housing Accessibility and Involvement – 91.315(c)

Need to Increase the Number of Accessible Units (if Required by a Section 504 Voluntary Compliance Agreement)

Using the Low Income Housing Tax Credit program, the HOME program, the national Housing Trust Fund, and other Federal, State and local resources available, the Illinois Housing Development Authority (IHDA) will assist in funding the construction, acquisition and rehabilitation of decent, safe, affordable and accessible units statewide.

Activities to Increase Resident Involvements

Since the passage of the Quality Housing Work Responsibility Act (QHWRA) of 1998, PHAs have been required to have a resident commissioner. Local Public Housing Authorities statewide increase resident involvement through meetings and resident participation activities required under their PHA Agency Plans. Additional opportunities for resident input exist at those local PHAs receiving ROSS, Services Coordinator, and Family Self Sufficiency funding from HUD. The State of Illinois will also make efforts to build consensus statewide on strategies to increase resident participation through survey and increased data information gathering, the CR Advisory Committee, and additional coordination efforts.

Is the public housing agency designated as troubled under 24 CFR part 902?

N/A

Plan to remove the 'troubled' designation

There are over 100 local Public Housing Authorities in the State of Illinois. Those PHAs in a community not covered by a local Consolidated Plan are included in the State's jurisdiction. The HUD Office of Public and Indian Housing (PIH) generates a list of "troubled" PHAs each quarter. The Illinois Housing Development Authority will periodically consult with HUD on these PHAs located within the State jurisdiction designated as troubled, and include this information in the Annual Action Plan and Annual Performance Report.

The Illinois Housing Development Authority plans to consult with HUD on those PHAs within the State jurisdiction designated as troubled, and will provide outreach to the troubled PHA upon request and as needed. IHDA will also be available to meet with HUD officials to discuss areas where it may be able to provide technical assistance to assist local PHAs to remove this classification. These actions are discussed in more detail in AP-60

SP-55 Barriers to affordable housing – 91.315(h)

Barriers to Affordable Housing

The narrative below provides detail on the following identified barriers:

1. Building Codes
2. Home Rule
3. Impact Fees
4. Property Taxes
5. Cost and Availability of Land
6. Availability of Affordable and Accessible Housing
7. Public Housing
8. Preservation
9. Homelessness
10. Other Special Needs

1 Building Codes

Elimination/Removal of Barriers to Affordable Housing

Illinois is a wildly assorted state, having the largest number of local governments in the country. According to a 2005 Rural Research Report from IIRA, entitled "Governmental Structure in Illinois," it had 1,251 municipalities, 1,433 townships, 102 counties, and 3,681 special taxing districts. This was updated by the ILGA Legislative Research Unit in May of 2015 to now reflect a total of 6,953 total local governments in Illinois. As of April 2018, the Illinois State Comptroller listed the number as 8,529. While this is not a barrier per se, the network of local government authorities and approval requirements must be evaluated by both non-profit and for-profit affordable housing developers as well as public agencies when pursuing any such projects or programs.

The related regulatory environment is also of note. Here are some major facets of it:

1) Building Codes While there is not a State statutory building code, the Illinois Municipal Code sets general parameters for local Comprehensive planning, zoning, and building codes. Furthermore, there are nearly a dozen State laws impacting local governments in specific areas, including plumbing, stormwater, septic systems, lead poisoning prevention, asbestos abatement, manufacturing living, physical and infrastructural barriers, and historic preservation. These various State laws/regulations or local ordinances serve legitimate public health and safety concerns as well as sound public management practices. All laws construed by an individual or group as discriminatory or excessive are also open to court challenge under federal fair housing laws as well as the Illinois Human Rights Act.

Strategy to Remove or Ameliorate the Barriers to Affordable Housing

Ten (10) general statements and potential barriers were cited in MA-40, the Market Analysis section of this Five-Year Plan. The discussions on Building Codes, Home Rule, Impact Fees, and Property Taxes in that section were included to better describe the regulatory governance under which affordable housing in Illinois currently operates. The State's strategy for addressing barriers identified in regards to the Cost and Availability of Land, Availability of Affordable and Accessible Housing, Public Housing, Preservation, Homelessness and Other Special Needs is as follows:

1. Cost and Availability of Land: Barrier

Land Bank Capacity Program (LBCP) and Technical Assistance Network (TA Network)

The Land Bank Capacity Program (LBCP) and Technical Assistance Network (TA Network) provide access to funding and technical assistance for the creation/operation of land banks to Illinois communities outside the Chicago metro area, with funding through the Illinois Attorney General's Office

Eligible Grant Activities include:

Develop and submit documentation to form a land bank

Off-set related legal expenses and holding costs in connection with on-going land bank creation

Maintenance and other activities

-Fund reasonable start-up costs (including staffing and legal fees for land bank creation)

-initial acquisitions of 1-6 unit residential properties. Property acquisition costs may include:

-Purchase price

-Lien extinguishment (excepting property taxes)

-Legal costs

-Title, recording, and transfer fees

-Demolition costs

-Costs of lot treatment and greening

-Redevelopment and disposition of vacant and abandoned properties in order to return them to affordable housing and other productive use

TA Network Eligible Grant Activities include the following:

- Providing planning, real estate and other assistance
- Conducting webinars for communities looking to form land banks/access community revitalization tools for programs available via IHDA or others
- Creating, updating, and/or disseminating video tutorials to recipients of TA Network funds
- Creating, updating, and/or disseminating print media packages regarding land banks

Both the LBCP and TA Network assist communities by providing grant funds to help local and regional revitalization efforts by increasing planning and land banking capacity. IHDA began administration of the first year of the program in CY 2018, with 10 grantees

The Illinois Housing Development Authority will continue to prepare the Housing Affordability Impact Notes for all requested State legislation, requested by State legislators. The Housing Affordability Impact Note states: "Every bill, except those making a direct appropriation, the purpose or effect of which is to directly increase or decrease the cost of construction, purchasing, owning, or selling a single-family residence shall have prepared for it, before second reading in the house of introduction, a brief explanatory statement or note that shall include a reliable estimate of the anticipated impact."

2.Availability of Affordable and Accessible Housing: Barrier

Illinois Housing Search Website: ILHousingSearch.org is an online affordable housing locator maintained by the Illinois Housing Development Authority (IHDA) that lists available affordable housing across the state. Users search for affordable housing by geographical location, size, price, accessibility features, amenities, and other eligibility criteria.

State Referral Network Created in 2007 originally within IHDA's LIHTC Program, the Statewide Referral Network (SRN) links populations already connected to services to affordable, available and supporting housing. SRN units are affordable for persons with extremely low-incomes (30% area median income). Eligible populations include persons living with disabilities, experiencing homelessness, at risk of homelessness, and at risk of institutionalization.

Embedded in Illinois' housing locator site is a password-protected login through the Pre-Screening, Assessment, Intake and Referral (PAIR) module for SRN and Section 811 units. The PAIR module is a waitlist management system allowing for pre-screening of individuals for eligibility through an initial questionnaire, collecting details of those who potentially qualify for intake onto a waiting list. The SRN Waiting List receives referrals through the module from various service providers; housing locators, transition coordinators and care coordinators. The Housing Waiting List Manager then facilitates the matching and referral of qualified applicants to properties with SRN units.

AHPAA Implementation: The Affordable Housing Planning and Appeal Act (AHPAA) encourages affordable housing production in communities (municipalities with populations over 1,000, and counties) throughout the state by requiring communities with less than 10% affordable housing stock (known as 'non-exempt' communities) to participate in activities that promote affordable housing in

their communities. Non-exempt communities are required to produce and approve an affordable housing plan 18 months after the date of their non-exempt notification. While there is no major enforcement process in this law, it codifies the state's intent in providing affordable housing. The AHPAA also established the State Housing Appeals Board (SHAB), appointed by the Governor, which is responsible for hearing appeals received from developers who feel that one of their development proposals have been unfairly denied, or unreasonable conditions were placed upon the tentative approval of the development to make it economically feasible to carry out, by a non-exempt local government. IHDA has continued to provide a set-aside for projects located in AHPAA and "at risk" communities each year in its Low Income Housing Tax Credit (LIHTC) Qualified Allocation Plan. IDoA, IDHS and IDHFS are involved via an intergovernmental agreement

Accessibility: IHDA has encouraged developers to include additional handicapped accessible units in their projects by providing incentive points in the LIHTC applicant scoring system. It has also incorporated the international Building Code's Universal Housing scoring into its IHDA Rental Housing Construction Standards used in non-home municipalities which don't have a local building code.

Rental Assistance: Rental Assistance is a necessary resource for a variety of households, including extremely low-income households, homeless/at risk, persons with disabilities and other special needs populations. The State's focus is on the following: Continued administration of the State funded Rental Housing Support Program; Including incentives for rental assistance in the QAP applicant scoring system, to encourage preservation projects as well as PHA participation with Project-Based Vouchers; Administration of the IDHS Bridge Rental Subsidy Program for Williams and Colbert class members who qualify to be placed in community-based housing.

3. Public Housing: Barrier

Major barriers facing public housing are increasing deferred maintenance, and inadequate funding issues. Many public housing projects require extensive rehabilitation or redevelopment work. The HUD Rental Assistance Demonstration (RAD) Program assists by encouraging public housing authorities (PHAs) to convert their public housing into Section 8 project-based or project-based vouchers by entering into public-private partnerships. PHA projects must first document whether the proposed RAD rehabilitation project can qualify for 4% non-competitive tax credits.

Since 2013, when HUD approved a statewide Coordinated Remedial Plan for the State, local public housing authorities in Illinois have been able to establish preferences on their Public Housing waiting lists for Special Needs/Olmstead populations. PHAs provide preference to persons with disabilities who are participating in one of three consent decrees (Colbert, Williams, and Ligas), or seeking to move out of a State-Operated Developmental Center.

4. Preservation: Barrier

Several programs promote the preservation of affordable housing throughout the State, both single- and multi-family.

The Community Development Block Grant Program/Housing Rehabilitation Grant Program assists eligible CDBG local governments in helping homeowners (for non-entitlement areas of the State) make necessary repairs and improvements to their homes to eliminate health and safety problems, correct building code violations, and preserve the long-term integrity of the units.

The Low Income Housing Tax Credit (LIHTC) Program is an indirect federal subsidy used to finance the development or redevelopment of affordable rental housing for low-income households (at 60% area median income or below). The State awards these federal tax credits to affordable housing developers who use the investor capital generated from the sale of these tax credits to lower the debt burden on developing these tax credit properties, making it easier to offer lower, more affordable rents. IHDA also made it able for an LIHTC property owner to establish a rental/operating reserve in any project that included Statewide Referral Network units, which was funded through an allowable 3% increase in developer fees to better serve these 30% AMI or below households. LIHTC Unit must maintain affordable rent for at least 30 years.

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

Rehabilitation of units is an eligible activity under both the HOME and national Housing Trust Fund programs.

Community Revitalization Technical Assistance Network

IHDA offers technical assistance to communities and housing developers pursuing tax credits in Qualified Census Tracts (QCTs), R/ECAPS, and other areas of the state where Opportunity Area points from the QAP are not available. There are large swaths of the state that are unable to undertake Community Revitalization no matter how permissive the process is. This is particularly true for smaller rural communities across Illinois that lack the capacity to plan in a formal way. To address this issue, IHDA established a Community Revitalization Network to help all communities throughout Illinois plan to meet their housing needs.

IHDA expanded the network across the state to build upon and link to existing planning efforts, identify strengths and needs within the community, and generate localized capacity via a community revitalization strategy process. Partnerships, formalized through a signed scope of work, generally last longer than a year, and afford communities free planning services conducted by IHDA. Partnerships with

IHDA result in a final Housing Needs Assessment planning document, which outlines data-driven strategies for accessing affordable housing resources. Communities also have the option for individual services, such as community outreach, development resources, housing stock surveys, funding strategies, or other recommendations if they believe it is a better fit for their community. As of December 2019, 118 projects/communities in the state have received some level of technical assistance from IHDA. IHDA's Community Revitalization staff has served/is currently serving on 13 advisory groups that allow IHDA to provide partners and other organizations with community revitalization guidance.

5. Homelessness and Other Special Needs: Barrier

All of Illinois' 102 counties are served by a local/regional Continuum of Care organization. The approach is to identify existing programs and services, evaluate their adequacy, and identify other needed services, and ways to provide same in each service area. Homeless Prevention programs, Emergency Shelters, Transitional Housing, Permanent Housing and individual and family self-sufficiency are the major features of each continuum. Identified causes of homelessness that have been reported by shelter providers include insufficient income, structural deficiency of housing, relocation, institutional release, family disputes, and overcrowding, to name a few major ones

Home Illinois: Illinois' Plan to Prevent & End Homelessness

This two-year plan focuses on building state and community infrastructure to end homelessness. With funding from COVID-19 recovery resources, state agencies are expanding capacity to administer programs and communities are expanding to address needs. The Plan provides strategies and supports for rapid housing and services expansion. Over two State Fiscal Years partners will complete a data analysis to understand what financial, housing, services and human resources will be needed to end homelessness in every region of the state.

Four themes are the pillars of the plan: RE-Ethnic, Build Affordable & Permanent Supportive Housing; Bolster the Safety Net; Secure Financial Stability and Close the Mortality Gap. A foundational goal of the plan is ending the RD that exists in homelessness with activities that push forward reducing unacceptable ethnic inequities.

State agencies submitted commitments supporting the plan goals. Each strategy includes a series of activities to support the strategy that follow a consistent format within each pillar:

Key activities within the plan include:

A number of initiatives require interagency collaboration and coordination. Key coordination strategies include:

Development of permanent supportive housing: The Illinois Housing Development Authority (IHDA), Illinois Department of Human Services (IDHS), Illinois Department of Commerce & Economic

Opportunity (DCEO) and Illinois Department of Healthcare and Family Services (HFS) will work together on strengthening the development and operations of permanent supportive housing. As IHDA and DCEO administer funding for capital, acquisition and rehabilitation of non-congregate shelter and supportive housing, HFS and IDHS will develop pathways for sustainable supportive services funding.

Supporting college students experiencing homelessness: College students with housing stability should have access to dorms during school holiday breaks and know what employment, food and educational resources are available to them. The Illinois Board of Higher Education (IBHE) and Illinois Community College Board (ICCB) will work with Task Force agencies, community colleges and universities to support students.

Improve discharge planning for young adults: The Illinois Department of Children and Family Services (DCFS), Department of Juvenile Justice (IDJJ), Illinois Department of Corrections (IDOC) and IDHS – Division of Mental Health will participate in a work group to ensure discharge planning and procedures support housing stability for young adults leaving State systems of care.

Expansion of medical respite model: Medical respite, or recuperative care, is temporary housing paired with clinical care for people experiencing homelessness after an in-patient hospital stay. HFS, IDHS and IHDA will work together to support expansion of the availability of medical respite housing across the state.

SP-60 Homelessness Strategy – 91.315(d)

Reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs

Homeless outreach services include connecting individuals with emergency shelter, housing, onsite healthcare, and other critical services.

More urban CoCs have robust street outreach teams and use their coordinated entry access points (shelters, drop-in centers, etc.). More rural CoCs seem to rely on a single outreach team (often PATH) or community partners that notify the continuum if someone is experiencing homelessness.

Addressing the emergency and transitional housing needs of homeless persons

Housing relocation and stabilization services and short- and/or medium-term rental assistance are provided as necessary to help individuals or families living in shelters or in places not meant for human habitation move as quickly as possible into permanent housing and achieve stability in that housing.

The majority of CoCs mention they have emergency shelters that quickly work to place persons in whatever housing best suits their needs, including transitional housing, rapid rehousing, emergency transitional housing funded through Illinois' Department of Human Services, or permanent supportive housing. Two CoCs no longer have any CoC-funded transitional housing and many CoCs are focused on Rapid Re-Housing as an emergency solution.

Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again.

Services for special populations include emergency shelter, case management, childcare, education services, employment assistance and job training, outpatient health services, legal services, life skills training, mental health services, substance abuse treatment services, and transportation. Pursuant to Public Act 100-0010, the Illinois Veterans' Advisory Council (IVAC) took over the responsibilities to investigate the re-entry process for servicemembers who return to civilian life after active-duty service. The transition of the initiatives of the Discharged Service Members Task Force to the IVAC should bring about a more efficient process by including a wide array of members and representatives comprising many different national recognized veteran service organizations that make up the IVAC.

The state encourages providers to focus on the rapid rehousing component of ESG. The Street Outreach component is now being requested by providers that are mainly located within larger metropolitan

areas. These providers reach out to individuals/families that are living in their vehicles or on the streets. The homeless individuals and families are connected with emergency shelter, permanent housing, onsite healthcare, and other critical services.

Continua of Care are using their coordinated entry systems to prioritize populations with the most need for permanent supportive housing and to evaluate how their system works to transition people from shorter term housing to PSH. Many CoCs are using intense case management and supplemental supportive services in the community to ensure PSH is successful, and homelessness does not recur. Chicago's CoC uses housing locators to supplement the transition to PSH. Southern IL has service provider agencies that receive funding to provide furniture, moving costs, and first rent as well as security deposit to ensure against recurrence.

Help low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families who are likely to become homeless after being discharged from a publicly funded institution or system of care, or who are receiving assistance from public and private agencies that address housing, health, social services, employment, education or youth needs

Housing relocation and stabilization services and short-and/or medium-term rental assistance are provided as necessary to prevent the individual or family from becoming homeless if annual income of the individual or family is below 30 percent of median family income and assistance is necessary to help program participants regain stability in their current permanent housing or move into other permanent housing and achieve stability in that housing. Under the National Housing Trust Fund, IHDA will prioritize PSH, especially in the creation of new units for households at or below 30% AMI.

CoCs use a range of strategies to prevent people from experiencing homelessness who are exiting publicly funded institutions or receiving other social services. Some CoCs encourage their agencies to connect their clients to other supportive resources. Many CoCs have agencies that provide their own set of services that prevent homelessness. Three continua work directly with local institutions to actively prevent homelessness as people exit those institutions. Regardless of the level of each CoC's involvement, every CoC has some array of agency provided services or partnerships with other organizations to provide supportive services in order to prevent homelessness.

SP-65 Lead based paint Hazards – 91.315(i)

Actions to address LBP hazards and increase access to housing without LBP hazards

The Lead Poisoning Prevention Act (LPPA - Public Act 94-0879) sets pre-emptive measures to prevent childhood lead-poisoning, including inspections of buildings suspected of containing lead hazards. The LPPA has provisions barring owners of residential buildings who willfully violate lead safety laws from doing business with the State of Illinois or any State agency until the violation is mitigated, along with increased fines and mandatory notice to tenants of possible lead hazards in their building.

Significant features of the Illinois Lead Poisoning Prevention Act (LPPA) include classifying pregnant persons with elevated blood lead levels as subject to the same IDPH case management and physical response as children, and for the reporting of ALL blood-lead tests in Illinois (with restrictions on data disclosure). IDPH is able to issue Emergency Stop Work Orders when public health is in jeopardy as the result of improper work activities disturbing lead bearing surfaces.

Taking effect in 2025 is a more stringent standard for public health intervention based on childhood blood level testing. Under new Illinois law, any child residing in a high-risk ZIP code is to be tested automatically at 12, 24, and 36 months, and all children six years of age and younger must be assessed for lead exposure through a pediatrician-administered questionnaire.

Enforcement capabilities include instances where violations of the LPPA and the Lead Poisoning Prevention Code (LPPC) have occurred, with penalty provisions bringing Illinois in compliance with U.S. EPA requirements for all authorized State programs. Language on lead reporting and lead-related work activities includes physicians/healthcare providers, laboratories, schools, daycare providers, owners of regulated facilities with an identified lead hazard and both licensed and unlicensed construction industry professionals.

The U.S. Environmental Protection Agency (EPA) has approved the Illinois Lead Poisoning Prevention Program for operation in lieu of a federal program under Section 402 of the federal Toxic Substances Control Act.

Through the Lead Poisoning Prevention Act (410 ILCS), the State designated the Illinois Department of Public Health as the regulatory agency for the identification and mitigation/abatement of lead hazards for children under sixteen years of age identified with elevated blood lead levels. Children under six years of age are considered a priority-targeted population. IDPH is responsible for the training and licensing of lead inspectors, contractors, and abatement workers. IDPH's laboratories provide blood lead analysis for Medicaid and medically indigent children. The IDPH Childhood Lead Poisoning Prevention Program maintains the HELPSS Reporting System, Follow-up Data Collection System, and Clearinghouse of Information, and provides technical assistance to entities statewide on blood screening and follow-up. Delegate agencies are monitored for accurate and efficient physical and infrastructural inspections through IDPH's Division of Environmental Health.

Both IHDA, through its multi-family new construction and rehabilitation programs and DCEO, through its Single-family Housing Rehabilitation program, work to increase the number of units available statewide that are free of lead-based paint hazards

How are the actions listed above integrated into housing policies and procedures?

Public Act 94-0879 includes provisions barring owners of residential buildings who have willfully violated lead safety laws from doing business with the State of Illinois or any State agency until the violation is mitigated, along with increased fines and mandatory notice to tenants of possible lead hazards in their building.

The IDPH works with the Illinois Building Commission and the DCEO to integrate lead safety into building renovations and encourage statewide compliance of the lead disclosure rule, and HUD regulations at 24 CFR 35 regarding the notification, evaluation, and reduction of lead-based paint hazards in federally owned residential property and housing receiving federal assistance. DCEO's Small Business Environmental Assistance Program (SBEAP) also provides information to small businesses on lead regulation and compliance requirements.

The IDPH will continue to participate on the Advisory Committee staffed by the IHDA to look for opportunities to promote lead-safe and other "healthy home initiatives" involving indoor air quality, pest control, dust control, etc. as outlined in HUD's Healthy Homes Initiative resulting from the White

House Task Force on Environmental Health Risks and Safety Risks to Children and Executive Order 13045. Under IHDA programs (including HOME and the federal Housing Trust Fund), all projects involving housing rehab must comply with HUD and EPA safety standards.

SP-70 Anti-Poverty Strategy – 91.315(j)

Jurisdiction Goals, Programs and Policies for reducing the number of Poverty-Level Families

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

The HHS-funded Community Services Block Grant (CSBG) Program is the major federally-funded anti-poverty program. Its history goes back to the original Federal Office of Economic Opportunity (OEO), which served to create community action agencies (CAAs) as a necessary link to coordinate these efforts at the local level. It is generally coordinated with other subject-specific programs, and is geared toward enabling low-income persons to become more self-sufficient. It is administered by DCEO at the State level, which funds the statewide network of CAAs and related organizations on an annual basis, contingent on federal funding. Uses of CSBG funds include the following: economic development; education; emergency assistance; health; housing; income management; linkages; nutrition; and self-sufficiency.

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

DCEO also administers the DOL-funded Workforce Investment and Opportunity Act funding, which provides federal funding to workforce development boards (WDBs) throughout the state for local employment and job training programs. The State has coordinated its efforts in this area by establishing Illinois Employment & Training Centers, which include staffing from WDBs, IDES-unemployment assistance and employment data and projections, and IDHS, to provide a one-stop shop for human services.

How are the Jurisdiction poverty reducing goals, programs, and policies coordinated with this affordable housing plan

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

IHDA also administers the State-funded Rental Housing Support Program (RHSP), which targets rental assistance through Local Administrative Agencies (LAAs) to households at 15-30% area median income. It also has begun administering the Section 811 Project Based Rental Assistance Demonstration Program, a HUD-funded program which is specifically targeted to persons with disabilities who are coming out of institutional facilities and searching for community-based housing.

IHDA also strongly encourages income targeting to lower-income households through the scoring system for its LIHTC Program. These include categories for Rental Assistance (under which it incentivizes applicants who work with their local PHAs to obtain project-based vouchers), as well as incentivizing applicants who set aside units for supportive housing populations (i.e., households at 30% AMI or below who are homeless/at-risk or include persons with disabilities). IHDA also strongly encourages applicant developers of proposed projects in Qualified Census Tracts to submit a detailed community revitalization plan. As many of these federally-designated areas have higher concentrations of low-income households, poverty, and unemployment, IHDA has provided applicants for these types of projects with very specific referral sources to identify employment & training centers, community colleges, workforce development boards, and small business development centers in serving the project area.

IDHS-Division of Mental Health administers a rental assistance program for persons with mental illness via its Bridge Rental Subsidy Program (BRSP). It is funded through a State-imposed hospital tax.

IDHS administers the Home Services Program for persons with disabilities to provide in-home services to avoid premature or unnecessary institutionalization. IDoA administers a similar in-home services program for the elderly population known as the Community Care Program. Both are authorized under federally approved Medicaid waivers. Similarly, for years the State has operated a Supportive Living Facilities program through IDHFS, also through a Medicaid waiver. It provides assisted living services funding to elderly persons, primarily those eligible for Medicare, so that they can reside in affordable housing that is less restrictive and less expensive than nursing homes. IHDA has assisted in the financing of many of these properties.

IHDA has regularly worked with local public housing authorities (PHAs) and their non-profit affiliates to develop mixed-financing projects. Many have involved long-term homeownership programs through the LIHTC Program. More recently, many PHAs are or will be seeking IHDA assistance for their Rental Assistance demonstration (RAD) Program projects, which allow them to convert traditional public housing properties to Section 8 project-based assistance.

Under the federal Housing Trust Fund, IHDA is able to increase its production of units for Extremely Low income households at 30% of AMI or below.

SP-80 Monitoring – 91.330

Describe the standards and procedures that the state will use to monitor activities carried out in furtherance of the plan and will use to ensure long-term compliance with requirements of the programs involved, including minority business outreach and the comprehensive planning requirements

Objectives:

The objectives of State monitoring and reporting on these programs are to determine if grantees and sponsors:

- Are carrying out local projects and programs as described in their applications (as revised or amended) and contracts/grant agreements;
- Are carrying out the program or project in a timely manner;
- Are charging costs to the program or project which are eligible under applicable regulations and the grant/regulatory agreement;
- Are complying with other applicable laws, regulations, and terms of the contract/grant agreement;
- Are conducting the program in a manner which minimizes the opportunity for fraud, waste, and mismanagement; and
- Have a continuing capacity to carry out the approved program or project.

The State of Illinois currently receives under direct HUD formula grant funding five (5) programs: The Community Development Block Grant (CDBG) administered by Department of Commerce and Economic Opportunity (DCEO); the HOME Program and the national Housing Trust Fund (HTF), both administered by the Illinois Housing Development Authority (IHDA); the Emergency Solutions Grants Program, administered by the Department of Human Services; and the Housing Opportunities for Persons with AIDS (HOPWA) Program, administered by IDPH. While each agency has its own procedures, most of the major steps in monitoring are very similar. Grantees and/or project sponsors are responsible for selecting, planning, and carrying out approved programs, projects, and activities in accordance with State and Federal law and regulations, and with the contracts or grant agreements executed between each grantee or sponsor and one of the three State funding agencies (DCEO, IHDA, IDPH, or IDHS). The State ultimately has the responsibility to ensure that grantees and project sponsors are carrying out their programs in accordance with all applicable laws and regulations.

Management of Monitoring Activities:

The two major types of monitoring that State agency staff carry out for these programs are: desk monitoring and field monitoring.

Desk monitoring is an ongoing process of retrieving a grantees'/sponsors performance. It involves using all available data or making judgments about performance and is conducted in the office of the State Funding agency (DCEO, IHDA, IDHS, or IDPH).

Among the sources of information available for desk review and analysis are:

- 1) approved application(s);
- 2) the grant or regulatory agreement or contract;
- 3) grantee-prepared physical and infrastructural reviews (DCEO and HOME);
- 4) drawdown requests for reimbursement;
- 5) grantee responses to monitoring and audit findings;
- 6) monitoring trip reports;
- 7) citizen and administrative complaints;
- 8) litigation;
- 9) data supplied by other state and federal agencies; and
- 10) audit reports.

Information is used to observe lack of activity or inappropriate changes in grantee/project sponsor activity, to identify problems, potential problems, program status and accomplishments. Analysis of the data may indicate the need for a special monitoring visit by program staff to resolve or prevent a problem.

Expected Resources

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

Introduction

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

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

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

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	28,988,172.00	0.00	0.00	28,988,172.00	115,952,688.00	The annual allocation for Illinois' CDBG program has decreased by \$1,385,932 or 4.5% since the last Consolidated Plan. With higher costs and less funding available, the project outcomes will decrease.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	15,688,880.15	19,720,057.39	0.00	35,408,937.54	62,755,520.60	IHDA operates by Grant Based Accounting. The deadline for committing program income, repayments and recaptured funds received during a program year is the date of the PJ's commitment deadline for the subsequent year's grant allocation, thus, the program income listed here is 2024 Program Income which has the same deadline as 2025 Grant Funds

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
HOPWA	public - federal	Permanent housing in facilities Permanent housing placement Short term or transitional housing facilities STRMU Supportive services TBRA	2,582,959.00	0.00	0.00	2,582,959.00	10,331,836.00	HOPWA funds provide short term mortgage, utility tenant based assistance, and permanent housing placements.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
ESG	public - federal	Conversion and rehab for transitional housing Financial Assistance Overnight shelter Rapid re-housing (rental assistance) Rental Assistance Services Transitional housing	5,190,081.00	0.00	0.00	5,190,081.00	20,760,324.00	ESG funds are used for street outreach, emergency shelter, homeless prevention, rapid rehousing, HMIS, and administration.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
HTF	public - federal	Acquisition Admin and Planning Homebuyer assistance Multifamily rental new construction Multifamily rental rehab New construction for ownership	6,654,452.74	0.00	0.00	6,654,452.74	26,617,810.96	Provides affordable rental housing for households at 30% AMI or below

Table 57 - Expected Resources – Priority Table

Explain how federal funds will leverage those additional resources (private, state and local funds), including a description of how matching requirements will be satisfied

HOPWA:

Generally, permanent, non-federal sources of funds that are non-refundable contributions from State or local government, or private sources, will be eligible to qualify as a matching contribution. Refer below for more specific information by program.

Acceptable Sources of HOME Match

- Local or State general revenues

- Housing trust funds
- Foundations, donations
- Program income from HODAG, RRP or UDAG only after grant closeout
- Value of waived taxes, fees, or charges
- Appraisal value of land or real property not acquired with Federal Funds
- Difference between appraised value and acquisition cost, if property is acquired with Federal funds
- Grant equivalent of below market
- Interest rate loans to the project
- The cost of investments, not made with federal resources, in on and off-site infrastructure that is directly required for the affordable housing assisted with HOME funds • Federal Home Loan Bank grants
- Value of donated material or labor
- Direct cost of supportive services that facilitate independent living or as part of a self-sufficiency program
- Direct cost of homebuyer counseling for families that complete a HOME assisted purchase

Unacceptable Sources of HOME Match

- All federal funds, including CDBG funds, Rental Rehabilitation Program, Homeless Housing programs, Weatherization, etc.
- Value attributable to federal tax credits
- The interest rate subsidy attributable to the federal tax exemption on financing
- Investor Capital or investment in a project
- Cash or other forms of contributions from investors, applicants for, or recipients of HOME assistance or contracts
- Expenditures on Program Administration

CDBG/Community Development Block Grant Program:

The State must match all but \$100,000 of the funds received for program administration. Community Revitalization grants focusing on Economic Development must be matched (at a minimum) dollar for dollar. Housing Rehabilitation and Public Infrastructure grants do not require match but do receive a point value when leverage is contributed.

Housing Trust Fund: For the federal HTF, Projects which are able to commit other non-federal funds as part of their project financing will be

given additional consideration. There is no State or local match requirements for the national HTF, but IHDA anticipates most national HTF-funded projects will be highly leveraged

ESG: Each grant recipient must supplement its Emergency Solutions Grant funds with an equal or greater amount of funds from other sources. 25% of the match must be cash. The amount available for matching fund purposes must be injected during the grant period.

Acceptable sources of ESG match are the State of Illinois DHS Homeless Prevention and Emergency & Transitional Housing Programs, Community Services Block Grant, FEMA, and any other source including any Federal source other than the ESG program. If ESG funds are used to satisfy the matching requirements of another Federal program, then funding from that program may not be used to satisfy the ESG matching requirements. Matching contributions must meet all requirements that apply to ESG funds, the funds must be provided after the date that HUD signs the grant agreement, cash contributions must be expended with the expenditure deadline and noncash contributions must be made within the expenditure deadline. The matching requirement may be met by cash contributions and/or noncash contributions.

If appropriate, describe publically owned land or property located within the jurisdiction that may be used to address the needs identified in the plan

Individual State Agencies are not authorized to acquire/own real property. The Illinois Department of Central Management Services (CMS) is responsible for ownership and management of State facilities. Uses are statutorily limited and do not currently include affordable housing.

Discussion

The State's leveraging strategy includes the coordination of Low Income Housing Tax Credits (LIHTCs) with the development of housing that is affordable to low-income and moderate-income families. As the State's LIHTC allocating agency, IHDA coordinates the development of the annual Qualified Allocation Plan (QAP). Besides the program's already statutory targeting to households at 60% of area median income or below, IHDA has built a number of factors into its application scoring system to incentivize better targeting to lower income households. These include the following point categories: Rental Assistance; Larger Units; Green Building (lower utility bills); Rehabilitation (of existing housing); Community Revitalization Plans; 30% AMI Housing (10-15%); and Statewide Referral Network (SRN) units, which target 10-15% of a property's units to persons/households who are homeless/at-risk of homelessness or have a disability. All of these scoring criteria are aimed at incentivizing project applications which include deeper targeting to low-and moderate-income families.

Annual Goals and Objectives

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

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Multifamily Affordable Housing	2025	2029	Affordable Housing	Statewide Distribution	Affordable Housing	HOME: \$15,688,880.15	Rental units constructed: 35 Household Housing Unit Rental units rehabilitated: 24 Household Housing Unit
2	Federal Housing Trust Fund	2025	2029	Affordable Housing	Statewide Distribution	Affordable Housing National Housing Trust Fund	HTF: \$6,654,452.74	Rental units constructed: 34 Household Housing Unit Rental units rehabilitated: 22 Household Housing Unit
3	SingleFamily Owner Occupied Housing Rehabilitation	2025	2029	Affordable Housing	Statewide Distribution	Affordable Housing	CDBG: \$8,346,000.00	Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit: 128 Households Assisted
4	Public Infrastructure	2025	2029	Non-Housing Community Development	Statewide Distribution	Community and Economic Development	CDBG: \$14,268,174.00	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 7135 Persons Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
5	Community & Economic Revitalization	2025	2029	Non-Housing Community Development	Statewide Distribution	Community and Economic Development	CDBG: \$5,404,353.00	Jobs created/retained: 20 Jobs Businesses assisted: 1 Businesses Assisted Buildings Demolished: 1 Buildings Other: 3 Other
6	Disaster Response Program	2025	2029	Non-Housing Community Development	Statewide Distribution	Community and Economic Development	CDBG: \$.00	
7	Housing For Persons with HIV/AIDS	2025	2029	Affordable Housing Non-Homeless Special Needs		Special Needs	HOPWA: \$2,559,959.00	Tenant-based rental assistance / Rapid Rehousing: 1595 Households Assisted Housing for People with HIV/AIDS added: 120 Household Housing Unit
8	2025-2029 Permanent Housing Placement	2025	2029	Affordable Housing Non-Homeless Special Needs		Special Needs	HOPWA: \$23,000.00	Other: 45 Other
9	Street Outreach to Homeless	2025	2029	Homeless	Statewide Distribution	Affordable Housing	ESG: \$471,088.00	Other: 3000 Other
10	Provide Emergency Shelter to Homeless	2025	2029	Homeless	Statewide Distribution	Affordable Housing	ESG: \$2,285,295.00	Homeless Person Overnight Shelter: 12500 Persons Assisted
11	Prevent Homelessness	2025	2029	Homeless	Statewide Distribution	Affordable Housing	ESG: \$.00	Homelessness Prevention: 0 Persons Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
12	Rapid Re-Housing of Homeless	2025	2029	Homeless	Statewide Distribution	Affordable Housing	ESG: \$1,765,195.00	Tenant-based rental assistance / Rapid Rehousing: 1200 Households Assisted

Table 58 – Goals Summary

Goal Descriptions

1	Goal Name	Multifamily Affordable Housing
	Goal Description	
2	Goal Name	Federal Housing Trust Fund
	Goal Description	
3	Goal Name	SingleFamily Owner Occupied Housing Rehabilitation
	Goal Description	The program targets housing projects which preserve single-family, owner-occupied housing and encourages neighborhood revitalization. The goal is calculated by dividing the funds allocated by the maximum amount of grant award (currently \$650,000), rounding up to the nearest whole number, and then multiplying the result by 10 (the minimum number of homes that must be completed per award).
4	Goal Name	Public Infrastructure
	Goal Description	This program provides funding for water and sewer related activities to benefit primarily low-to-moderate income persons. Goal is estimated by taking the amount of annual funding divided by the grant ceiling (\$1,000,000) multiplied by the average number of persons assisted per grant (500). Goal outcomes are based on 51% LMI.

5	Goal Name	Community & Economic Revitalization
	Goal Description	Rural communities have a variety of unmet needs with no funding to address the challenges. This includes blighted structures that pose a health and safety hazard, crumbling sidewalks and streetscapes that make pedestrian traffic difficult, commercial facades with deferred maintenance, preservation of historic structures that tell their story, closed buildings that could be used for good purposes, and funds to keep current businesses and attract new ones. CDBG has eligible activities that provide for all of these needs, but the State of Illinois has not provided the opportunity (with the exception of Economic Development) on a regular basis. Beginning with the 2025-2029 Consolidated Plan and the 2025 Action Plan, the State will make these activities available. In addition to filling the need, we believe we will utilize available funds faster, as Economic Development is a slow-use activity, dependent on if/when a business needs it; and the Department of Commerce and Economic Opportunity has other business assistance programs with fewer requirements.
6	Goal Name	Disaster Response Program
	Goal Description	This program reimburses communities that have experienced a gubernatorially-declared disaster for clean-up. As Disasters have occurred infrequently the last few years, no funding is being allocated to the program. If a Disaster should occur, funds will be reallocated from other program allocations.
7	Goal Name	Housing For Persons with HIV/AIDS
	Goal Description	
8	Goal Name	2025-2029 Permanent Housing Placement
	Goal Description	
9	Goal Name	Street Outreach to Homeless
	Goal Description	Provide street outreach services to reduce the number of unsheltered homeless.

10	Goal Name	Provide Emergency Shelter to Homeless
	Goal Description	Provide funding for operating costs and services in homeless shelters in Illinois.
11	Goal Name	Prevent Homelessness
	Goal Description	Reduce the number of families and individuals who become homeless for the first time. ESG will not be funding Homeless Prevention this year of this plan. The State of Illinois non-federal Homeless Prevention funds will provide and/or supplement funding within this category.
12	Goal Name	Rapid Re-Housing of Homeless
	Goal Description	The goal for the State is to reduce the average length of time persons are homeless and reduce the number of families and individuals who are homeless.

AP-25 Allocation Priorities – 91.320(d)

Introduction:

The amounts allocated in AP-20 do not include Administration and Technical Assistance for the CDBG program. HUD allows for 3% of the annual allocation plus \$100,000 to be used for Administration and Technical Assistance. In 2025, this totals to \$969,645. The State must match 1:1 all funds used for Administration up to \$869,645.

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

Funding Allocation Priorities

	Multifamily Affordable Housing (%)	Federal Housing Trust Fund (%)	Single Family Owner Occupied Housing Rehabilitation (%)	Public Infrastructure (%)	Community & Economic Revitalization (%)	Disaster Response Program (%)	Housing For Persons with HIV/AIDS (%)	2025-2029 Permanent Housing Placement (%)	Street Outreach to Homeless (%)	Provide Emergency Shelter to Homeless (%)	Prevent Homelessness (%)	Rapid Rehousing (%)
CDBG	0	0	30	50	20	0	0	0	0	0	0	0
HOME	100	0	0	0	0	0	0	0	0	0	0	0
HOPWA	0	0	0	0	0	0	85	15	0	0	0	0
ESG	0	0	0	0	0	0	0	0	9	44	0	0
HTF	0	100	0	0	0	0	0	0	0	0	0	0

Table 59 – Funding Allocation Priorities

Reason for Allocation Priorities

Funding percentages for Homeless Priorities are determined in consultation with Illinois Continuum of Care organizations. Percentage doesn't include administration allocation of 7.5%.

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

resources. Regarding federal HTF Funds: HTF funding provided rental assistance for households at 30% of AMI or below.

HOPWA funding can only serve people living with HIV/AIDS that are currently housed and households income at or below 80 percent the area medium income. Funding is provided to seven housing facilities that provide emergency shelter for homeless persons living with HIV/AIDS. HOPWA and Ryan White Part B fund provides a safety net for persons living with HIV/AIDS to move or maintain long-term, stable living situations. Illinois communities are facing the same problems as in other areas of the country: housing closures, under staffed facilities, increase in housing clientele and reduction in funds for housing assistance. HOPWA and Ryan White funds provide a resource that is critical to people living with HIV/AIDS in Illinois. The use of CARE Act Funds has enabled housing opportunities for persons living with HIV/AIDS.

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

ESG Funding percentages for homeless priorities are determined in consultation with Illinois Continuum of Care organizations. Percentages doesn't include administration allocation of \$378,545 will be used for allowable administrative costs. \$289,959 will be used for HMIS. The above percentages are rounded to whole number. ESG will be allocating \$471,088 Street Outreach; \$2,285,294 Emergency Shelter; \$1,765,195 Rapid Rehousing.

How will the proposed distribution of funds will address the priority needs and specific objectives described in the Consolidated Plan?

All HOME funding will result in increased affordable renter opportunities across the State

All federal Housing Trust Fund funding will result in increased affordable rental opportunities for households at or below 305 of AMI across the State.

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

The continuum of care that is provided through local HIV care Connect Region includes the following services: case management, primary medical care, lab services, treatment adherence services, dental care, rent assistance, emergency housing assistance, utility assistance, legal services, nutritional services, optical services, mental health counseling, substance abuse counseling, transportation, and alternative therapies. The Department developed an application for use by all HIV Care Connect to prepare their initial HOPWA funding plans. The

application required all project sponsors to describe the intended service area, the population of persons with HIV/AIDS, and the housing service needs not currently being addressed by available public and/or private resources within the service area. Additionally, the Department required a project plan and budget, including measurable goals and objectives, project coordination and how the project would be continued if HOPWA funds were reduced or not available in future years. The application process incorporated a deadline for submission of applications.

CDBG Housing Rehabilitation Activities will result in the preservation of affordable housing in non-entitlement areas of the State.

Besides the carve-out for Housing Rehabilitation, DCEO is distributing funding based on the needs identified in the Consolidated Plan, with the majority of available funds going to assist communities with safe and healthy drinking water and sanitary sewer systems.

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

Introduction:

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

Community Development Block Grant Program (CDBG);

HOME;

Emergency Solutions Grants Program (ESG);

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

Housing Trust Fund (HTF)

Distribution Methods

Table 60 - Distribution Methods by State Program

1	State Program Name:	CDBG Community & Economic Revitalization
	Funding Sources:	CDBG

<p>Describe the state program addressed by the Method of Distribution.</p>	<p>Rural communities have a variety of unmet needs with no funding to address the challenges. This includes blighted structures that pose a health and safety hazard, crumbling sidewalks and streetscapes that make pedestrian traffic difficult, commercial facades with deferred maintenance, preservation of historic structures that tell their story, closed buildings that could be used for good purposes, and funds to keep current businesses and attract new ones. CDBG has eligible activities that provide for all of these needs, but the State of Illinois has not provided the opportunity (with the exception of Economic Development) on a regular basis. Beginning with this Consolidated Plan and the 2025 Action Plan, the State will make these activities available. In addition to filling the need, we believe we will utilize available funds faster, as Economic Development is a slow-use activity, dependent on if/when a business needs it; and the Department of Commerce and Economic Opportunity has other business assistance programs with fewer requirements.</p>
<p>Describe all of the criteria that will be used to select applications and the relative importance of these criteria.</p>	<p>Local governments that do not receive an allocation of CDBG funds directly from HUD will be able to apply for funds to meet their particular revitalization needs. Communities must provide specific information on need for the project, if other funding will be part of the project, what the outcome of the project will be, and what plans are in place for sustainability of the outcome (if applicable). Projects that address health and safety risks will be prioritized.</p>
<p>If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)</p>	<p>Application Guidelines and forms can be found at: https://dceo.illinois.gov/</p>

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

	Describe how resources will be allocated among funding categories.	<table border="1"> <thead> <tr> <th><u>Program Category</u></th> <th><u>Budget</u></th> <th><u>Ceiling</u></th> <th><u>Deadline</u></th> </tr> </thead> <tbody> <tr> <td colspan="4"><u>Ongoing (non-competitive Programs)</u></td> </tr> <tr> <td>Community & Economic Revitalization (CR)</td> <td>\$ 5,404,353</td> <td>variable</td> <td>NA</td> </tr> <tr> <td>Disaster Response (DR)</td> <td>\$0</td> <td>\$250,000</td> <td>NA</td> </tr> <tr> <td colspan="4"><u>Competitive Programs</u></td> </tr> <tr> <td>Public Infrastructure (PI)</td> <td>\$14,268.174</td> <td>\$1,000,000</td> <td>TBD</td> </tr> <tr> <td>Housing Rehabilitation (HR)</td> <td>\$ 8,346,000</td> <td>\$ 650,000</td> <td>TBD</td> </tr> </tbody> </table>	<u>Program Category</u>	<u>Budget</u>	<u>Ceiling</u>	<u>Deadline</u>	<u>Ongoing (non-competitive Programs)</u>				Community & Economic Revitalization (CR)	\$ 5,404,353	variable	NA	Disaster Response (DR)	\$0	\$250,000	NA	<u>Competitive Programs</u>				Public Infrastructure (PI)	\$14,268.174	\$1,000,000	TBD	Housing Rehabilitation (HR)	\$ 8,346,000	\$ 650,000	TBD
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Describe threshold factors and grant size limits.	<p>The maximum grant award is \$1,000,000. If utilized for Economic Development, grant awards are based on the number of jobs created (\$25,000/job) and jobs retained (\$10,000) up to the maximum award. Demolition project awards are dependent on the type of structure being demolished. A commercial building is eligible for up to \$250,000; \$1,000,000 if there are four or more adjacent commercial buildings; and large structures such as schools, big box stores and factories are eligible for up to \$2,000,000. Facade Renovations, Sidewalks and Streetscapes, Historic Preservation of non-residential structures, and Renovation or Conversion of a closed building are eligible for up to \$1,000,000.</p> <p>Grants must meet the national objective of low-to-moderate income or elimination of slum and blight.</p>																													
What are the outcome measures expected as a result of the method of distribution?	<p>The goals below include an outcome of just one grantee per activity per year, though depending on requests may be more for some activities and less for others. Planned goals for each year are 1 Facade Renovation for a business, 20 jobs created for the Economic Development activity, 1 Building Demolished, and 3 "Other" Outcomes. The Other Outcomes are: 1 Community assisted with a sidewalk/streetscape activity (IDIS Matrix code #03L), 1 Renovation/Conversion of a Closed Building (IDIS Matrix code #17C) and 1 Non-Residential Historic Preservation activity (IDIS Matrix code #16B)</p>																													
2	State Program Name:	CDBG Disaster Response Program																												
	Funding Sources:	CDBG																												

<p>Describe the state program addressed by the Method of Distribution.</p>	<p>In response to CPD Notice 17-06, this as-needed program is designed for communities affected by an unforeseen event resulting in a State Disaster Declaration by the Governor of the State of Illinois. Beginning in 2023, no specific funds will be allocated in the Action Plan as few disasters have been declared in the last several years. However, funds will be reallocated from other programs if the need arises.</p>
<p>Describe all of the criteria that will be used to select applications and the relative importance of these criteria.</p>	<p>Each application <u>must</u> include the Unit of General Local Government's (UGLG's) most recent audit. If unavailable, please contact the Department to determine potential alternative documentation.</p> <ol style="list-style-type: none"> 1. All required application forms must be completed with appropriate backup documentation. 2. The Department reserves the right to designate an application DO NOT FUND, and not complete the rest of its review for the following reasons: Using self-created forms. Forged, copied, taped, pasted or any alterations to original signatures or dates. <p>The project must qualify for the National Objective of Urgent Need, however, the percentage of Low-to-Moderate income persons in the area must be provided. If the area meets or exceeds 51% LMI, the National Objective of LMI will be utilized in the grant award</p>
<p>If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)</p>	<p>Application Guidelines and forms can be found at: https://dceo.illinois.gov/</p>

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

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Describe threshold factors and grant size limits.	Applications must come after a State Disaster Declaration by the Governor for the area. Grant limit is \$250,000 unless the limit is waived by DCEO's Director.																													
What are the outcome measures expected as a result of the method of distribution?	Unknown at this time.																													
3																														
State Program Name:	CDBG Housing Rehabilitation Program																													
Funding Sources:	CDBG																													
Describe the state program addressed by the Method of Distribution.	The program targets housing projects which preserve single-family, owner-occupied housing and encourage neighborhood revitalization. The funds are available to address housing needs of eligible low-to-moderate income households																													

<p>Describe all of the criteria that will be used to select applications and the relative importance of these criteria.</p>	<p>The maximum available points per application are 100 points. The maximum scores available for each of the four scoring criteria are:</p> <ol style="list-style-type: none"> 1. <u>Project Need Maximum Score 20 Points</u> Project Need may be established based on the low-to-moderate income of an entire community, an individual census block, combined census blocks, or a target area. The score will be based on total percentage of LMI households in the project area. 2. <u>Project Impact Maximum Score 20 Points</u> In order to document an achievable impact in the project area, a minimum number of completed Housing Needs Surveys must be submitted with the application; the equivalent of two times the projects proposed scope of work. 3. <u>Coordination of Resources Maximum Score 30 Points</u> Scores will be provided based upon the applicants submission of documentation of additional resources which will provide assistance to LMI households in coordination with the CDBG housing programs. 4. <u>Project Readiness Maximum Score 30 Points</u> Scores will be provided based upon the applicant's submission of documentation that all administrative and technical issues involved in assuring a successful housing project have been addressed
<p>If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)</p>	<p>Application Guidelines and forms can be found at: https://dceo.illinois.gov/</p>

<p>Describe the process for awarding funds to state recipients and how the state will make its allocation available to units of general local government, and non-profit organizations, including community and faith-based organizations. (ESG only)</p>	<p>N/A</p>
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Describe threshold factors and grant size limits.	<p>Benefit to Low-and-Moderate Income Persons: Each application must include documentation that the proposed project will benefit 100% low-to-moderate income persons. Those projects benefiting less than 100% low-to-moderate income persons will not be considered further.</p> <p>Minimum grant award is \$300,000; grant ceiling is \$650,000</p>																													
What are the outcome measures expected as a result of the method of distribution?	CDBG Housing Rehabilitation Program goals are determined by dividing the program budget by the grant ceiling of \$650,000 and multiplied by the required number of homes (10) per grant.																													
4																														
State Program Name:	CDBG Public Infrastructure Program																													
Funding Sources:	CDBG																													
Describe the state program addressed by the Method of Distribution.	The objective of this competitive program component is to fund public infrastructure projects, with priority given to projects involving water and sanitary systems, or storm sewer upgrades																													

<p>Describe all of the criteria that will be used to select applications and the relative importance of these criteria.</p>	<p>Projects will be evaluated according to the criteria noted below.</p> <ol style="list-style-type: none"> 1. Project is in an Opportunity Zone (5 percent of overall score) 2. Project is in a DCEO Identified Area (5 percent of overall score) 3. Project Impact/Per Capita Cost: In order to maximize the number of beneficiaries, points will be assigned according to the grant funds requested per person served. A maximum of ten points will be assigned to projects requesting \$1,000 or less per person served. No points will be assigned to projects requesting \$5,000 or more per person. 4. Additional Funding: Additional points will be assessed for communities contributing other funding toward the completion of the proposed project. A maximum of 5 points will be assigned to projects contributing \$150,000 or more of the total project costs. No points will be assigned to projects contributing less than \$50,000. <p>Threat to Health & Safety/Urgency (25 percent of overall score): The degree to which present conditions affect public health and safety, and the severity and immediacy of the problem</p>
<p>If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)</p>	<p>Application Guidelines and forms can be found at:https://dceo.illinois.gov/</p>

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

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<p>Describe threshold factors and grant size limits.</p>	<p>1.Low to Moderate Income Benefit Requirement: Each application must include documentation that the proposed project will benefit at least 51.0 percent LMI persons.</p> <p>2.Documentation of Threat to Health and Safety: Each application should detail the public infrastructure needs to be addressed by the proposed project.</p> <p>3.Water and Sewer Rates: A fundamental principle of utility fund financing is that user rates should be sufficient to fund the entire cost of utility system operations.</p> <p>Minimum grant award is \$300,000; grant ceiling is \$1,000,000</p>																												
<p>What are the outcome measures expected as a result of the method of distribution?</p>	<p>The number of persons served for the Public Infrastructure program is calculated by dividing the program budget by the grant ceiling of \$1,000,000; and then multiplying by the average number of persons served by each Public Infrastructure grant (500).</p>																												
<p>5</p>	<table border="1"> <tr> <td data-bbox="247 1109 646 1166"> <p>State Program Name:</p> </td> <td data-bbox="646 1109 1906 1166"> <p>Emergency Solutions Grants Program</p> </td> </tr> <tr> <td data-bbox="247 1166 646 1222"> <p>Funding Sources:</p> </td> <td data-bbox="646 1166 1906 1222"> <p>ESG</p> </td> </tr> <tr> <td data-bbox="247 1222 646 1399"> <p>Describe the state program addressed by the Method of Distribution.</p> </td> <td data-bbox="646 1222 1906 1399"> <p>The Emergency Solutions Grants provides funding to engage homeless individuals and families living on the street: improve the number and quality of emergency shelters for homeless individuals and families; help operate these shelters; provide essential services to shelter residents; rapidly re-house homeless individuals and families and prevent families/individuals from becoming homeless.</p> </td> </tr> </table>	<p>State Program Name:</p>	<p>Emergency Solutions Grants Program</p>	<p>Funding Sources:</p>	<p>ESG</p>	<p>Describe the state program addressed by the Method of Distribution.</p>	<p>The Emergency Solutions Grants provides funding to engage homeless individuals and families living on the street: improve the number and quality of emergency shelters for homeless individuals and families; help operate these shelters; provide essential services to shelter residents; rapidly re-house homeless individuals and families and prevent families/individuals from becoming homeless.</p>																						
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<p>Describe all of the criteria that will be used to select applications and the relative importance of these criteria.</p>	<p>Recommendations for funding are based on: the needs assessment conducted by the regional Homeless Continuums of Care, housing analysis, and performance of the provider agency (based on HMIS (Homeless Management Information System) and other factors).</p>
<p>If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)</p>	<p>N/A</p>
<p>Describe the process for awarding funds to state recipients and how the state will make its allocation available to units of general local government, and non-profit organizations, including community and faith-based organizations. (ESG only)</p>	<p>Deliberate steps are taken to identify the providers, either units of local government or not-for-profit organizations, based on regional need and the ability to administer and expend the funds. The Department uses a formula-based spreadsheet in order to determine the amount of ESG funding for each Continuum of Care (CoC). The spreadsheet includes statistical data for poverty, housing, population, etc... These amounts are then provided to each CoC with a request for funding recommendations. They are asked to provide the organization name, amount of funding recommended, and the activities recommended for funding. The recommended organizations are required to submit a completed application including a budget. The applications are reviewed for completeness by at least 2 staff persons. If necessary, a list of "Outstanding Application Requirements" is sent to the provider detailing documentation that is still needed.</p>

	Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)	N/A
	Describe how resources will be allocated among funding categories.	Resources are allocated to eligible ESG activities based on Continuum of Care recommendations as needs vary across the communities.
	Describe threshold factors and grant size limits.	ESG minimum grant award is \$25,000. Recipients must be a participating member of a Homeless Continuum of Care.
	What are the outcome measures expected as a result of the method of distribution?	ESG funds will be used to provide affordability of decent housing through homeless prevention and rapid re-housing activities; and will provide availability/accessibility of a suitable living environment to homeless individual and families who need emergency shelter.
6	State Program Name:	HOME Multifamily (including CHDO)
	Funding Sources:	HOME
	Describe the state program addressed by the Method of Distribution.	Multifamily new construction and rehabilitation (including Community Housing Development Organizations - CHDOs)

<p>Describe all of the criteria that will be used to select applications and the relative importance of these criteria.</p>	<p>Review and selection criteria include but are not limited to financial feasibility (using IHDA-published underwriting criteria), site and market feasibility development/management team capacity and experience, site control, commitment of leveraged resources, and other factors. These factors increase if the Low Income Housing Tax Credit is involved, as the program has its own separate application scoring system</p>
<p>If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)</p>	<p>N/A</p>
<p>Describe the process for awarding funds to state recipients and how the state will make its allocation available to units of general local government, and non-profit organizations, including community and faith-based organizations. (ESG only)</p>	<p>N/A</p>

<p>Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)</p>	<p>N/A</p>
<p>Describe how resources will be allocated among funding categories.</p>	<p>Under the 2025-2029 Consolidated Plan, IHDA is only utilizing HOME funding for rental housing development/rehabilitation. The program uses IHDA's "Common" application and funding process. Funding allocation is based on a number of factors including available resources, anticipated program income, anticipated completion timeframe for existing programs, pipeline of approved projects requesting HOME funding, and alternative funding sources available, among other factors.</p> <p>It is IHDA's intent that in Program Year 2025 to allocate our funding in the following ways, Admin 10%, CHDO 15% and the balance of 75% for the New Construction or Rehabilitation of Multi-Family Rental Projects. Please also note that in the AP-35 screen that the total amount reflects more than what is in the AP-15 due to previous year funding that will be carried out in Program Year 2025. These funds should not be considered as prior year funding for the purpose of the consolidated plan funding amounts in the AP-15 screen.</p>
<p>Describe threshold factors and grant size limits.</p>	<p>Threshold factors are described in detail in the Multifamily common application referenced above. Grant (loan) size limits have been imposed for IHDA's subordinate debt sources (i.e., primarily HOME and (State) Affordable Housing Trust Fund) due to relative lack of availability to meet demand. It is primarily involving projects also seeking Low Income Housing Tax Credit assistance. For non-metro and AHPAA areas, it is set at 20% of total development costs, capped at a maximum request of \$2 million. For Chicago it is set at 10% of total development costs. For Chicago-metro, and other metro areas, it is set at 15% of total development costs, capped at a maximum request of \$1 million</p>

	<p>What are the outcome measures expected as a result of the method of distribution?</p>	<p>The State of Illinois will use the following HUD-determined Objective and Outcome statements for its CPD-HOME formula activities, expressed via the number of affordable housing units provided/preserved:</p> <ul style="list-style-type: none"> Accessibility for the purpose of creating suitable living environments Accessibility for the purpose of creating economic opportunities Affordability for the purpose of providing decent affordable housing Affordability for the purpose of creating economic opportunities Sustainability for the purpose of creating suitable living environments Sustainability for the purpose of providing decent affordable housing
7	<p>State Program Name:</p>	<p>HOPWA Permanent Housing Placement Services</p>
	<p>Funding Sources:</p>	<p>HOPWA</p>
	<p>Describe the state program addressed by the Method of Distribution.</p>	<p>Funding will provide individuals with HIV/AIDS, first month rent and security deposits to establish permanent residential housing.</p>
	<p>Describe all of the criteria that will be used to select applications and the relative importance of these criteria.</p>	<p>The Illinois Department of Public Health's application for HOPWA funding requires all applicants, including HIV Care Connect Regions, to describe the regional area to be served by the applicant, the population of persons with HIV/AIDS in the proposed regional area to be served, and the housing service needs not currently being addressed by available public and/or private resources within the proposed service area. IDPH requires a project plan and budget as part of the application process, including measurable goals, objectives, project coordination, and information on how the project would be continued if HOPWA funds were reduced or not available in future years. The application process is expected to fund Project sponsors located around the State. Facility based rental assistance will allow the State to ensure that housing is available to the most at-risk individuals living with HIV/AIDS that require the more intensive supportive living environment to deal with other issues. Perament Housing will be used to provide first months rent and security deposits to enable persons with HIV /AIDS to aquire housing.</p>

<p>If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)</p>	<p>NA</p>
<p>Describe the process for awarding funds to state recipients and how the state will make its allocation available to units of general local government, and non-profit organizations, including community and faith-based organizations. (ESG only)</p>	<p>The sponsor selection process is based on the Lead Agencies that receive funding for Ryan White Title II funds. Each Regional Care Connect office has a local advisory board to assist the lead agency with determining priority services. The Department allows the HIV Care Connect Lead Agents to subcontract with local service providers for housing services. The Department holds meetings with lead agencies, giving instruction on how to include faith-based organizations as entities eligible to apply for funding. The type of collaboration brings a wide variety of people together to address a very complex disease. The HIV Care regions have experience in identifying needs, planning, contracting for services, developing formal linkages with service providers and providing a continuum of care to persons with HIV/AIDS. The work plan will include descriptions of populations to be served, the care and service needs of the populations and ways in which the HIV Care Connect Regions will ensure that the most in need will receive housing assistance. The application required all HIV Care Connect Regions to describe the intended regional area to be served, the population of persons with HIV/AIDS, and the housing service needs not currently being addressed by public and private resources within the service area</p>

<p>Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)</p>	<p>Application process will be extended to the entire State with the intent to provide emergency and stable housing to individuals living with HIV/AIDS who are at-risk of homelessness. Stable housing provides a foundation for individuals with chronic illness such as HIV/AIDS, to improve their health outcomes.</p>
<p>Describe how resources will be allocated among funding categories.</p>	<p>The application required all project sponsors to describe the intended service area, the population of persons with HIV/AIDS, and the housing service needs not currently being addressed by available public and/or private resources within the service area. Additionally, the Department required a project plan and budget, including measurable goals and objectives, project coordination and how the project would be continued if HOPWA funds were reduced or not available in future years. Facilities to describe the intended service area, the population of persons with HIV/AIDS, and the housing service needs not currently being addressed by available public and/or private resources within the service area. Additionally, the Department required a project plan and budget, including measurable goals and objectives, project coordination and how the project would be continued if HOPWA funds were reduced or not available in future years.</p>

	Describe threshold factors and grant size limits.	HIV Care Connect Region funding formula is based on an annual award amount that is based on the morbidity data. All HIV Care Connect are increased based on the increase in housing costs and the number of persons served. Funding is also based on local availability of resources as well as other community resources. The Department developed an application for use by all HIV Care Connect to prepare their initial HOPWA funding plans. The application required all project sponsors to describe the intended service area, the population of persons with HIV/AIDS, and the housing service needs not currently being addressed by available public and/or private resources within the service area. Additionally, the Department required a project plan and budget, including measurable goals and objectives, project coordination and how the project would be continued if HOPWA funds were reduced or not available in future years. The application process incorporated a deadline for submission of applications.
	What are the outcome measures expected as a result of the method of distribution?	The prevention of homelessness is the most important element of administering the HOPWA program. Persons living with HIV/AIDS require stable housing in order to receive effective treatment. All program activities must be administered in accordance with the Department of Housing and Urban Development HOPWA Rules and Regulations. HOPWA grantees are encouraged to develop community-wide strategies through forming partnerships with area non-profits to provide housing assistance and supportive services for eligible persons. HOPWA grantees are urged to require eligible clients to access mainstream entitlement housing and utility assistance programs before accessing HOPWA funds.
8	State Program Name:	HOPWA Short-term Rent, Utility, Mortgage Program
	Funding Sources:	HOPWA

<p>Describe the state program addressed by the Method of Distribution.</p>	<p>The HOPWA Short-term Rent, Utility and Mortgage Program (STRUM) provides rent, mortgage and utility assistance to persons living with HIV/AIDS. The Illinois HOPWA program eligibility is based on the 80% area median income. The individual requesting housing assistance must demonstrate a need for housing assistance. In addition, the Department of Public Health had allocated funding to Winnebago County Health Department to provide Tenant based rental assistance. Currently, ten remain stably housed. Housing service caps are instituted under the HOPWA program to include uniformity and non-discrimination to households requesting rent, mortgage or utility assistance. Caps are determined by fair market rents/rent reasonableness.</p>
<p>Describe all of the criteria that will be used to select applications and the relative importance of these criteria.</p>	<p>The Illinois Department of Public Health's application for HOPWA funding requires all applicants, including HIV Care Connect Regions, to describe the regional area to be served by the applicant, the population of persons with HIV/AIDS in the proposed regional area to be served, and the housing service needs not currently being addressed by available public and/or private resources within the proposed service area. IDPH requires a project plan and budget as part of the application process, including measurable goals, objectives, project coordination, and information on how the project would be continued if HOPWA funds were reduced or not available in future years. The application process incorporates a deadline for submission of applications</p>
<p>If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)</p>	<p>NA</p>

<p>Describe the process for awarding funds to state recipients and how the state will make its allocation available to units of general local government, and non-profit organizations, including community and faith-based organizations. (ESG only)</p>	<p>NA</p>
<p>Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)</p>	<p>Each Regional office has a local advisory board to assist the lead agency with determining priority services. The type of collaboration brings a wide variety of people together to address a very complex disease. The HIV Care regions have experience in identifying needs, planning, contracting for services, developing formal linkages with service providers and providing a continuum of care to persons with HIV/AIDS. The work plan will include descriptions of populations to be served, the care and service needs of the populations and ways in which the HIV Care Connect Regions will insure that the most in need will receive housing assistance. The application required all HIV Care Connect Regions to describe the intended regional area to be served, the population of persons with HIV/AIDS, and the housing service needs not currently being addressed by public and private resources within the service area</p>

<p>Describe how resources will be allocated among funding categories.</p>	<p>The application required all housing The application required all project sponsors to describe the intended service area, the population of persons with HIV/AIDS, and the housing service needs not currently being addressed by available public and/or private resources within the service area. Additionally, the Department required a project plan and budget, including measurable goals and objectives, project coordination and how the project would be continued if HOPWA funds were reduced or not available in future years. Facilities to describe the intended service area, the population of persons with HIV/AIDS, and the housing service needs not currently being addressed by available public and/or private resources within the service area. Additionally, the Department required a project plan and budget, including measurable goals and objectives, project coordination and how the project would be continued if HOPWA funds were reduced or not available in future years</p>
<p>Describe threshold factors and grant size limits.</p>	<p>HIV Care Connect Region funding formula is based on an annual award amount that is based on the morbidity data. All HIV Care Connect are increased based on the increase in housing costs and the number of persons served. Funding is also based on local availability of resources as well as other community resources. The Department developed an application for use by all HIV Care Connect to prepare their initial HOPWA funding plans. The application required all project sponsors to describe the intended service area, the population of persons with HIV/AIDS, and the housing service needs not currently being addressed by available public and/or private resources within the service area. Additionally, the Department required a project plan and budget, including measurable goals and objectives, project coordination and how the project would be continued if HOPWA funds were reduced or not available in future years. The application process incorporated a deadline for submission of applications</p>
<p>What are the outcome measures expected as a result of the method of distribution?</p>	<p>The prevention of homelessness is the most important element of administering the HOPWA program. Persons living with HIV/AIDS require stable housing in order to receive effective treatment. All program activities must be administered in accordance with the Department of Housing and Urban Development HOPWA Rules and Regulations. HOPWA grantees are encouraged to develop community-wide strategies through forming partnerships with area non-profits to provide housing assistance and supportive services for eligible persons. HOPWA grantees are urged to require eligible clients to access mainstream entitlement housing and utility assistance programs before accessing HOPWA funds</p>

9	State Program Name:	HOPWA Tenant Based Rental Assistance
	Funding Sources:	HOPWA
	Describe the state program addressed by the Method of Distribution.	In 2015, Winnebago County Health Department application described the intent to provide tenant based rental assistance due to the number of persons living with HIV/AIDS that do not have an emergency need for receiving Short Term Rent Mortgage and Utility assistance. As a result at total of 10 persons living with HIV/AIDS are provided with affordable housing. Stable housing provides a foundation for individuals with chronic illness such as HIV/AIDS, to improve their health outcomes. The Department plans to expand the use of tenant based rental assistance to other Project sponsors and entities around the State.
	Describe all of the criteria that will be used to select applications and the relative importance of these criteria.	The Illinois Department of Public Health's application for HOPWA funding requires all applicants, including HIV Care Connect Regions, to describe the regional area to be served by the applicant, the population of persons with HIV/AIDS in the proposed regional area to be served, and the housing service needs not currently being addressed by available public and/or private resources within the proposed service area. IDPH requires a project plan and budget as part of the application process, including measurable goals, objectives, project coordination, and information on how the project would be continued if HOPWA funds were reduced or not available in future years. The application process incorporates a deadline for submission of applications.
	If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)	NA

<p>Describe the process for awarding funds to state recipients and how the state will make its allocation available to units of general local government, and non-profit organizations, including community and faith-based organizations. (ESG only)</p>	<p>NA</p>
<p>Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)</p>	<p>The selection process will be opened to the entire State. The Department allows the HIV Care Connect Lead Agents to subcontract with local service providers for housing services. The Department will be holding meetings with lead agents, giving instruction on how to include faith-based organizations as entities eligible to apply for funding</p>

	Describe how resources will be allocated among funding categories.	Each Regional office has a local advisory board to assist the lead agency with determining priority services. The type of collaboration brings a wide variety of people together to address a very complex disease. The HIV Care regions have experience in identifying needs, planning, contracting for services, developing formal linkages with service providers and providing a continuum of care to persons with HIV/AIDS. The work plan will include descriptions of populations to be served, the care and service needs of the populations and ways in which the HIV Care Connect Regions will insure that the most in need will receive housing assistance. The application required all HIV Care Connect Regions to describe the intended regional area to be served, the population of persons with HIV/AIDS, and the housing service needs not currently being addressed by public and private resources within the service area
	Describe threshold factors and grant size limits.	Project Sponsors that are located in the State of Illinois can submit a request for providing Tenant based housing assistance. Project Sponsors will receive funding to service persons living with HIV/AIDS who are in need of housing and supportive services.
	What are the outcome measures expected as a result of the method of distribution?	Client households provided units of decent, safe and affordable housing,
10	State Program Name:	National Housing Trust Fund
	Funding Sources:	HTF

<p>Describe the state program addressed by the Method of Distribution.</p>	<p>The Illinois Housing Development Authority (IHDA) has been designated by the Governor as the administering State agency for the federal Housing Trust Fund (HTF). Authorizing statute and HUD’s interim rule place specific parameters on the eligible uses of these funds. State federal HTF grantees are allowed to provide direct funding to subgrantee local governments to operate their own local programs/projects, but not required to do so. The State does not intend to use subgrantees in the 2025 funding cycle.</p> <p>Multi-family rental housing development (new construction or acquisition/rehabilitation. IHDA will not allow refinancing of existing debt as an eligible activity in the federal 2025 HTF Allocation Plan.</p> <p>If the national funding level falls below \$1 Billion, 100% of program funds must be used to benefit Extremely Low-Income (ELI) households, defined as 30% of area median income or less.</p> <p>States must use at least 80% of all funds (or 90% of program funds) for rental housing/renters. IHDA is allowed to use up to 10% of remaining program funds for homeownership assistance. IHDA will use 90% of all funds (100% of all program funds) for rental housing.</p> <p>There is also an allowance to use up to 10% of all funds for general administration and planning costs. IHDA will use said funds for this purpose, which also include fair housing activities.</p>
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<p>Describe all of the criteria that will be used to select applications and the relative importance of these criteria.</p>	<p>IHDA will use its Multi-Family “Common Application” as the major application format for HTF rental housing projects, the same one used for the LIHTC and HOME programs, along with supplemental information required by program rules (see below). IHDA’s process will include an initial completeness/eligibility scoring, review of mandatory requirements, underwriting, site and market review, peer review, internal Loan Committee and IHDA Board approval. A separate Request for Applications (RFA) process will be used if needed to expedite obligation of program funds. Under the RFA, IHDA requires that at least 10% of the total project cost be leveraged with non-IHDA resources. IHDA will not allow refinancing of existing debt as an eligible activity in the 2025 Allocation Plan of HTF, and reserves said right in following years</p> <p><u>Geographic Diversity:</u> The State will distribute HTF funds statewide, subject to the Affordable Housing Planning and Appeal Act to the prioritizing applications that are consistent with the 2025-2029 Consolidated Plan, Section AP-50 Geographic Distribution. IHDA will strive to achieve maximum geographic diversity based on statewide applications and where applicable, aligning set-asides associated with other programs providing non-federal, leveraged funding to the HTF, rather than establish geographic set asides under the HTF. In an effort to increase geographic diversity, IHDA provides application workshops in different locations throughout the state.</p> <p><u>Applicant Capacity:</u> As part of IHDA’s application process, each proposed project’s development and management team will be reviewed to ensure that the developer/owner has appropriate experience, capacity, and staffing to own, develop, and manage the project if approved for funding. This will include IHDA’s past experience with team members, and review of HUD previous participation certificates where applicable. IHDA will also strongly encourage first-time developers to partner with an experienced non-profit or for-profit entity.</p> <p><u>Project-Based Rental Assistance:</u> IHDA will prioritize all rental projects which have committed or available federal, State, and local project-based rental assistance so that rents are affordable to ELI families. These may include: Section 8 Project-Based (preservation only); Project-Based Vouchers; Rental Housing Support Program; and Section 811 Project-Based Rental Assistance. It will utilize 30% of household income for rents and utilities as its standard</p>
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	<p><u>Duration of Affordability Period:</u> Applicants must document the extent to which proposed rents are affordable, especially to ELI households. All projects will be required to establish a minimum 30-year affordability period. This will work well particularly for LIHTC projects (extended use) periods). Applicants are encouraged to establish longer affordability periods but must meet this minimum.</p> <p><u>Priority Housing Needs:</u> These are defined in the State’s Comprehensive Planning Act, and include ELI households; low-income seniors; low-income persons with disabilities; homeless and at-risk homeless persons and families; low-income households residing in communities with ongoing community revitalization; preservation; live-near-work projects, and other homeless prevention for special needs individuals such as veterans' and people with criminal records.</p>
<p>If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)</p>	<p>N/A</p>

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

<p>Describe how resources will be allocated among funding categories.</p>	<p>If the national funding level falls below \$1 Billion, 100% of program funds must be used to benefit Extremely Low-Income (ELI) households, defined as 30% of area median income or less. The 2025 Illinois HTF allocation is \$6,654,452.74. There is also allowance to use up to 10% of all funds (\$665,445.27 in 2025) for general administration and planning costs. IHDA will use said funds for this purpose, which also include furthering fair housing activities. IHDA will not establish geographic set-asides for Illinois/HTF program funds but will strive to achieve maximum geographic diversity in its final funding decisions.</p> <p>In addition, in Program Year 2025, IHDA will also commit \$12,945,884 from Program Year 2023 Housing Trust funds in order to meet our two-year commitment deadline. We will also commit \$605,325.66 admin funds from Program Year 2021/2022 funds. These funds will show up in the listed projects in the AP-35 screen to account for this commitment, but these should not be considered as Prior Year funds.</p>
<p>Describe threshold factors and grant size limits.</p>	<p>Maximum Per Unit Development Subsidy Costs-Grand Total Hard Cost Limits: A Project's grand total hard costs, as calculated in the Common Application, are limited to the sum of the products of the hard cost limit by bedroom type and the number of units, by bedroom type, in the Project. See "Grand Total Hard Costs" on the IHDA website for a complete breakdown of cost per bedroom size regarding the City of Chicago, and Chicago Metropolitan Areas; Other Metro; and Non-metro areas. Maximum allowable for 4+bedroom size in City of Chicago and Chicago Metro Area is \$833,000 per unit</p> <p>Maximum HTF Grant Limit is \$10,000,000, not to exceed 90% of total projects cost</p>

	<p>What are the outcome measures expected as a result of the method of distribution?</p>	<p>IHDA will utilize the same performance measurements and outcomes criteria that it has used for the HOME Program (Multi-Family). These are included in the State’s Five-Year Consolidated Plan – Strategic Plan and Annual Action Plan goals.</p> <p>The State of Illinois will use the following HUD-determined Objective and Outcome statements for its CPD-HTF formula activities, expressed via the number of affordable housing units provided/preserved:</p> <ul style="list-style-type: none"> • Accessibility for the purpose of creating suitable living environments <ul style="list-style-type: none"> • Accessibility for the purpose of creating economic opportunities • Affordability for the purpose of providing decent affordable housing • Affordability for the purpose of creating economic opportunities • Sustainability for the purpose of creating suitable living environments • Sustainability for the purpose of providing decent affordable housing
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Discussion:

AP-35 Projects – (Optional)

Introduction:

2025 Projects as added to the Consolidated Plan.

CDBG funded projects included below indicate the programs made available to units of local government. Local governments can apply for the program based on the requirements of each, and after appropriate merit review, may be awarded. These awards are considered "activities" and will be entered in IDIS as such.

#	Project Name
1	2025-2026 ILH25F999 Project of Quad Cities
2	2025-2026 ILH25F999 UIC-Positive Solutions
3	2025-2026 ILH25F999 SIU-School of Medicine
4	2025-2026 ILH25F999 St. Clair Co. HD
5	2025-2026 ILH25F999 Jackson Co. HD
6	2025-2026 ILH25F999 Champaign UPHD
7	2025-2026 ILH25F999 AFC-Collar
8	2025-2026 ILH25F999 AFC-Cook
9	Leyden Apartments MHR-12339
10	Giffords Crossing MHR-11984
11	Churchview MHR-12260
12	Hillside Senior Apts MHR-12106
13	Mason Street MHR-12384
14	Parker Glen II MHR-11959
15	Casa Yucatan MHR-11954
16	HOME Admin FY25
17	NHTF Admin FY25
18	2025 CDBG State Administration
19	2025 CDBG State Technical Assistance
20	2025 Community & Economic Revitalization Grant Program
21	2025 Public Infrastructure Grant Program
22	2025 Housing Rehabilitation Grant Program
23	2025 ESG
24	Hope Manor Joliet MHR-12459
25	Hill Street MHR-12452
26	Rock Island Veterans Housing
27	Villa guadalupe MHR-12228

Table 61 – Project Information

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

In awarding HOME funds, the Authority will target low- and very-low income households. Funds will be initially targeted to areas of the State that did not receive direct allocations of HOME Program funds from HUD. Rehabilitation of existing rental housing will help sustain the supply of affordable rental units and decrease the cost burden for low- and very low-income families. New Construction of units will provide affordable housing in areas where there exists a demand for new low-income units, and when HOME funding assistance is needed to make units affordable to low-income households.

Federal Housing Trust Fund resources provide affordable rental housing statewide for households at 30% of AMI or below.

HOPWA:

Provides grants to local communities, states, and non-profit organizations to benefit low-income HIV positive clients and their families. HOPWA funds may be used for a wide range of housing, social services, program planning, and development costs. These may include, but are not limited to, emergency housing, short term rental assistance, mortgage assistance, short term utility assistance, housing information and tenant based rental assistance for housing. HOPWA funds may be used also to provide supportive services, such as health care, mental health services, chemical dependency treatment, nutritional services, case management, assistance with daily living, and other services for individuals living with AIDS.

CDBG: CDBG funds are available to units of local government that are not receiving their own allocation of CDBG funds or located in a county receiving CDBG funds directly from the U.S. Department of Housing and Urban Development. All CDBG programs are designed to meet the 51% low-to-moderate income National Objective.

ESG: will follow what they have stated in AP15.

AP-38 Project Summary
Project Summary Information

1	Project Name	2025-2026 ILH25F999 Project of Quad Cities
	Target Area	
	Goals Supported	Housing For Persons with HIV/AIDS 2025-2029 Permanent Housing Placement
	Needs Addressed	Special Needs
	Funding	HOPWA: \$176,980.00
	Description	Provide housing services to persons living with HIV in Northwestern Illinois
	Target Date	
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	Boone, Bureau, Carroll, DeKalb, Henry, JoDaviess, Lee, Mercer, Ogle, Rock Island, Stephenson, Whiteside, and Winnebago - Counties
Planned Activities	Provide Housing services to persons living with HIV in Northwestern Illinois	
2	Project Name	2025-2026 ILH25F999 UIC-Positive Solutions
	Target Area	
	Goals Supported	Housing For Persons with HIV/AIDS 2025-2029 Permanent Housing Placement
	Needs Addressed	Special Needs
	Funding	HOPWA: \$243,673.00
	Description	Provide housing services to persons living with HIV in Heart of Illinois
	Target Date	
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	Fulton, Hancock, Knox, LaSalle, Marshall, Mason, McDonough, Mclean, Peoria Putnam, Stark, Tazewell, Warren, and Woodford - Counties

	Planned Activities	Provide Housing services to persons living with HIV in Heart of Illinois.
3	Project Name	2025-2026 ILH25F999 SIU-School of Medicine
	Target Area	
	Goals Supported	Housing For Persons with HIV/AIDS 2025-2029 Permanent Housing Placement
	Needs Addressed	Special Needs
	Funding	HOPWA: \$99,952.00
	Description	Provide housing services to persons living with HIV in Central Illinois
	Target Date	
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	Adams, Brown, Cass, Christian, DeWitt, Greene, Logan, Macon, Menard, Montgomery, Morgan, Moultrie, Piatt, Pike, Sangamon, Schuyler, Scott, and Shelby - Counties
	Planned Activities	Provide Housing services to persons living with HIV in Central Illinois.
4	Project Name	2025-2026 ILH25F999 St. Clair Co. HD
	Target Area	
	Goals Supported	Housing For Persons with HIV/AIDS 2025-2029 Permanent Housing Placement
	Needs Addressed	Special Needs
	Funding	HOPWA: \$41,443.00
	Description	Provide housing services to persons living with HIV in Southwestern Illinois
	Target Date	
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	Bond, Calhoun, Clinton, Fayette, Jersey, Macoupin, Madison, Marion, Monroe, Randolph, St. Clair, Washington - Counties

	Planned Activities	Provide Housing services to persons living with HIV in Southwestern Illinois.
5	Project Name	2025-2026 ILH25F999 Jackson Co. HD
	Target Area	
	Goals Supported	Housing For Persons with HIV/AIDS 2025-2029 Permanent Housing Placement
	Needs Addressed	Special Needs
	Funding	HOPWA: \$46,034.00
	Description	Provide housing services to persons living with HIV in Southern Illinois
	Target Date	
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	Alexander, Edwards, Franklin, Gallatin, Hamilton, Hardin, Jackson, Jefferson, Johnson, Massac, Perry, Pope, Pulaski, Saline, Union, Wabash, Wayne, White, and Williamson - Counties
Planned Activities	Provide Housing services to persons living with HIV in Southern Illinois.	
6	Project Name	2025-2026 ILH25F999 Champaign UPHD
	Target Area	
	Goals Supported	Housing For Persons with HIV/AIDS 2025-2029 Permanent Housing Placement
	Needs Addressed	Special Needs
	Funding	HOPWA: \$138,433.00
	Description	Provide housing services to persons living with HIV in East Central Illinois
	Target Date	
	Estimate the number and type of families that will benefit from the proposed activities	

	Location Description	Champaign, Clark, Clay, Coles, Crawford, Cumberland, Douglas, Edgar, Effingham, Ford, Iroquois, Jasper, Kankakee, Lawrence, Livingston, Richland, and Vermilion - Counties
	Planned Activities	Provide Housing services to persons living with HIV in East Central Illinois.
7	Project Name	2025-2026 ILH25F999 AFC-Collar
	Target Area	
	Goals Supported	Housing For Persons with HIV/AIDS 2025-2029 Permanent Housing Placement
	Needs Addressed	Special Needs
	Funding	HOPWA: \$413,830.00
	Description	Provide housing services to persons living with HIV in Collar Counties
	Target Date	
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	DuPage, Grundy, Kane, Kendall, Lake, McHenry, and Will
	Planned Activities	Provide Housing services to persons living with HIV in Collar Counties
	8	Project Name
Target Area		
Goals Supported		Housing For Persons with HIV/AIDS 2025-2029 Permanent Housing Placement
Needs Addressed		Special Needs
Funding		HOPWA: \$1,422,614.00
Description		Provide housing services to persons living with HIV in Cook County
Target Date		
Estimate the number and type of families that will benefit from the proposed activities		
Location Description		Cook County
Planned Activities		Provide Housing services to persons living with HIV in Cook County

9	Project Name	Leyden Apartments MHR-12339
	Target Area	Statewide Distribution
	Goals Supported	Multifamily Affordable Housing
	Needs Addressed	Affordable Housing
	Funding	HOME: \$5,982,876.00
	Description	
	Target Date	
	Estimate the number and type of families that will benefit from the proposed activities	The New Construction of 29 HOME units for the Elderly.
	Location Description	Franklin Park, Illinois in Cook County.
	Planned Activities	New Construction
10	Project Name	Giffords Crossing MHR-11984
	Target Area	Statewide Distribution
	Goals Supported	Multifamily Affordable Housing
	Needs Addressed	Affordable Housing
	Funding	HOME: \$7,085,728.00
	Description	
	Target Date	
	Estimate the number and type of families that will benefit from the proposed activities	New Construction of 26 HOME units for families.
	Location Description	Elgin, Illinois, Kane County
	Planned Activities	New Construction
11	Project Name	Churchview MHR-12260
	Target Area	Statewide Distribution
	Goals Supported	Multifamily Affordable Housing
	Needs Addressed	Affordable Housing
	Funding	HOME: \$3,107,076.00
	Description	

	Target Date	
	Estimate the number and type of families that will benefit from the proposed activities	New Construction of 14 HOME units for families.
	Location Description	Peoria, Illinois, Peoria County
	Planned Activities	New Constructioin
12	Project Name	Hillside Senior Apts MHR-12106
	Target Area	
	Goals Supported	Multifamily Affordable Housing
	Needs Addressed	Affordable Housing
	Funding	HOME: \$1,700,000.00
	Description	
	Target Date	
	Estimate the number and type of families that will benefit from the proposed activities	The New Construction of 8 HOME units for the Elderly.
	Location Description	Hillside, Illinois, Cook County
	Planned Activities	New Construction
13	Project Name	Mason Street MHR-12384
	Target Area	Statewide Distribution
	Goals Supported	Multifamily Affordable Housing
	Needs Addressed	Affordable Housing
	Funding	HOME: \$4,363,286.00
	Description	
	Target Date	
	Estimate the number and type of families that will benefit from the proposed activities	The New Construction of 22 units for families.
	Location Description	Springfield, Illinois, Sangamon County
	Planned Activities	New Construction

14	Project Name	Parker Glen II MHR-11959
	Target Area	Statewide Distribution
	Goals Supported	Multifamily Affordable Housing
	Needs Addressed	Affordable Housing
	Funding	HOME: \$2,714,096.00
	Description	
	Target Date	
	Estimate the number and type of families that will benefit from the proposed activities	The New Construction of 11 units for families.
	Location Description	Champaign, Illinois, Champaign County
	Planned Activities	New Construction
15	Project Name	Casa Yucatan MHR-11954
	Target Area	
	Goals Supported	Multifamily Affordable Housing
	Needs Addressed	Affordable Housing
	Funding	HOME: \$10,252,671.00
	Description	
	Target Date	
	Estimate the number and type of families that will benefit from the proposed activities	The New Construction of 42 units for families.
	Location Description	Chicago, Illinois, Cook County
	Planned Activities	New Construction
16	Project Name	HOME Admin FY25
	Target Area	
	Goals Supported	
	Needs Addressed	
	Funding	HOME: \$1,590,900.00
	Description	

	Target Date	
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	HOME administrative funds
17	Project Name	NHTF Admin FY25
	Target Area	
	Goals Supported	
	Needs Addressed	
	Funding	HTF: \$605,325.66
	Description	
	Target Date	
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	NHTF administrative funds.
18	Project Name	2025 CDBG State Administration
	Target Area	
	Goals Supported	
	Needs Addressed	
	Funding	CDBG: \$679,763.00
	Description	
	Target Date	
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	

19	Project Name	2025 CDBG State Technical Assistance
	Target Area	
	Goals Supported	
	Needs Addressed	
	Funding	CDBG: \$289,882.00
	Description	
	Target Date	
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	
20	Project Name	2025 Community & Economic Revitalization Grant Program
	Target Area	
	Goals Supported	
	Needs Addressed	
	Funding	CDBG: \$5,404,353.00
	Description	
	Target Date	
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	
21	Project Name	2025 Public Infrastructure Grant Program
	Target Area	
	Goals Supported	
	Needs Addressed	
	Funding	CDBG: \$14,268,174.00
	Description	

	Target Date	
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	
22	Project Name	2025 Housing Rehabilitation Grant Program
	Target Area	
	Goals Supported	
	Needs Addressed	
	Funding	CDBG: \$8,346,000.00
	Description	
	Target Date	
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	
23	Project Name	2025 ESG
	Target Area	Statewide Distribution
	Goals Supported	Prevent Homelessness Provide Emergency Shelter to Homeless Rapid Re-Housing of Homeless Street Outreach to Homeless
	Needs Addressed	Affordable Housing
	Funding	ESG: \$5,190,081.00
	Description	The 2025 Federal allocation of ESG funds for providers within the State of IL to provide street outreach, emergency shelter, rapid re-housing, homeless prevention, program administration and data collection through HMIS.
	Target Date	

	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	Services will be provided throughout the State of Illinois.
	Planned Activities	Tenant Based Rental Assistance/Rapid Re-Housing/Provide Emergency Shelter to Homeless/Homeless Over-night Shelter/Street Outreach to Homeless. (Note that not all eligible HESG activities will be funded every year of the total five-year period covered by the Consolidated Plan).
24	Project Name	Hope Manor Joliet MHR-12459
	Target Area	Statewide Distribution
	Goals Supported	Multifamily Affordable Housing
	Needs Addressed	Affordable Housing
	Funding	HOME: \$7,000,000.00
	Description	30 HOME Units of Multifamily New Construction
	Target Date	
	Estimate the number and type of families that will benefit from the proposed activities	30 Units of HOME Multifamily New Construction
	Location Description	1301 Copperfried, Joliet, Illinois, 60432
	Planned Activities	30 Units of Multifamily New Construction
25	Project Name	Hill Street MHR-12452
	Target Area	Statewide Distribution
	Goals Supported	Multifamily Affordable Housing
	Needs Addressed	Affordable Housing
	Funding	HOME: \$5,017,018.00
	Description	New Construction of 24 HOME Multifamily Units
	Target Date	
	Estimate the number and type of families that will benefit from the proposed activities	24 HOME eligible households

	Location Description	West of Hill Street, in Mt. Morris Illinois, 60154
	Planned Activities	Multifamily New Construction of 24 units
26	Project Name	Rock Island Veterans Housing
	Target Area	Statewide Distribution
	Goals Supported	Federal Housing Trust Fund
	Needs Addressed	National Housing Trust Fund
	Funding	HTF: \$6,438,552.00
	Description	New Construction of 19 Units of Federal Housing Trust Fund housing
	Target Date	
	Estimate the number and type of families that will benefit from the proposed activities	19 ELI Households at 30% of AMI and below
	Location Description	950 31st Ave., Rock Island, IL 61201
	Planned Activities	New Construction Only
	27	Project Name
Target Area		Statewide Distribution
Goals Supported		Federal Housing Trust Fund
Needs Addressed		National Housing Trust Fund
Funding		HTF: \$6,507,332.00
Description		33 Unit of Rehabilitation Housing
Target Date		
Estimate the number and type of families that will benefit from the proposed activities		
Location Description		1020 W. Roosevelt Road, Chicago Illinois, 60608
Planned Activities		33 Units of rehabilitated housing for ELI households

AP-40 Section 108 Loan Guarantee – 91.320(k)(1)(ii)

Will the state help non-entitlement units of general local government to apply for Section 108 loan funds?

No

Available Grant Amounts

N/A

Acceptance process of applications

N/A

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

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

No

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

N/A

AP-50 Geographic Distribution – 91.320(f)

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

The State has identified very and extremely low-income households as one of the priority populations under the Consolidated Plan. The State also places a high value on quality location of projects and availability of resources and access to amenities. HUD provides CDBG funds to DCEO primarily for projects in non-entitlement/non-urban areas. Since the CDBG program does limit the ability to utilize CDBG funds for housing beyond housing rehabilitation, the Department of Commerce and Economic Opportunity, as administrator of CDBG, targets CDBG funds to owner-occupied households in non-entitlement/non-urban areas. Under the HOME Program, IHDA expends the majority of its HOME Program funding for rental housing through its rental housing development program. To some extent, the expenditure of CDBG, HOME Program and other program funds on housing programs is driven by the market. The Authority's impact in opportunity areas within the State is limited by applications for funding in these areas, but is interested in partnering with other community organizations. This is achieved primarily through the Low Income Housing Tax Credit program.

CDBG/Community Development Block Grant Program funding is only available to communities that are not direct Entitlements (receive their own direct CDBG allocation).

ESG is geographically dispersed to the Illinois Continuum of Care agencies.

HOPWA is geographically dispersed to the Illinois HIV Care Consortia regions.

The national HTF will be dispersed statewide. IHDA has not established geographic set-asides, but strives to achieve maximum geographic diversity in its final funding decisions

Geographic Distribution

Target Area	Percentage of Funds
Statewide Distribution	100

Table 62 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

The State has not established a policy of targeting its funds within already federally or State-defined eligible areas of the State to more specific jurisdictions or regions. If absolute need numbers were used to determine resource allocations of programs, areas with less densely populated communities (e.g. rural areas, small cities, suburban areas with comparatively lower numbers of low and very low-income households versus total households) would be discriminated against, as most of the assistance would then go to large urban centers exclusively. The State agencies administering federal and State programs will continue to make concerted efforts to provide more outreach and technical assistance (e.g.

workshops) to eligible applicants to ensure that information on affordable housing, economic development, revitalization, and public facilities programs is available on an equitable basis.

Discussion

The State of Illinois has established guidelines for all its programs, but has also worked hard to retain the flexibility needed for local governments, non-profits, and developers to apply for projects that meet local market needs. As such, the only major factor governing geographic distribution under each of IHDA's programs is the enabling law or statute for that program. Income is already a major targeting mechanism under almost all of IHDA's as well as HUD's programs. Under its LIHTC Program, however, IHDA does incentivize affordable rental housing applications from local opportunity areas

Affordable Housing

AP-55 Affordable Housing – 24 CFR 91.320(g)

Introduction:

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

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

One Year Goals for the Number of Households to be Supported	
Homeless	1,200
Non-Homeless	243
Special-Needs	295
Total	1,738

Table 63 - One Year Goals for Affordable Housing by Support Requirement

One Year Goals for the Number of Households Supported Through	
Rental Assistance	295
The Production of New Units	69
Rehab of Existing Units	174
Acquisition of Existing Units	0
Total	538

Table 64 - One Year Goals for Affordable Housing by Support Type

Discussion:

Production of 35 new units includes anticipated through HOME Multifamily

Rehab of 24 existing units includes anticipated through HOME Multifamily

Production of 34 new units included anticipated units through National Housing Trist Fund

Rehab of 22 existing units included anticipated units through National Housing Trust Fund

Rehab of existing units includes 128 anticipated unites through CDBG single-family Housing

Rehabilitation.

Rental assistance includes the ESG goal of 1,200 households assisted through Rapid Re-Housing.

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

Introduction:

With passage of the Quality Housing and Work Responsibility Act, of 1998, States have a more pronounced role in working with local Public Housing Authorities. The State of Illinois does not own or operate any public housing as a public housing authority. Accordingly, the State does not expect to play a management role in encouraging residents of public housing to become more involved in the management of public housing. All public housing authorities are required by HUD to have Resident Councils or Advisory Boards. They are also required to have a resident serving as a member on their Board of Commissioners. The Council/Advisory Board must review and comment on the Public Housing Authority's Annual Agency Plan prior to submittal to HUD.

Actions planned during the next year to address the needs to public housing

- * The Consolidated Plan-Action Plan and the Annual Performance Report documents are sent to all Public Housing Authorities (PHAs) in Illinois. PHAs will remain part of the regular notification and distribution process for Consolidated Plan documents.
- * PHAs are sent an email inviting them to attend the Public Hearings on the Consolidated Plan.
- * IHDA took on the additional role of Certifying the Consistency of PHA Agency Plans with the State Consolidated Plan (for all PHAs serving Non-Entitlement Areas which are not covered by a local Consolidated Plan). IHDA has kept the Illinois Association of Housing Authorities (IAHA) and the Illinois Chapter of the National Association of Housing and Redevelopment Officials (NAHRO) informed of these procedures by attending targeted meetings of these organizations to make presentations and answer questions about the process to/from PHA officials.
- * IHDA will benefit from reviewing the PHA Agency Plans by obtaining information on PHA Waiting Lists. These assist IHDA in both its future site and market studies and in future program planning.
- * IHDA also works with several PHAs on converting Housing Choice Vouchers to Project-Based Assistance, especially under the Low-Income Housing Tax Credit Program.
- * IHDA has worked with a number of PHAs on Rental Assistance Demonstration programs to convert public housing into Section 8 project-based housing units.

Actions to encourage public housing residents to become more involved in management and participate in homeownership

The State of Illinois does not own or operate any public housing as a State public housing authority. As such, it does not anticipate any major State involvement in this area, except to continue to provide related program information to interested parties through the SPAR/Compliance and Reporting division

as part of its housing information clearinghouse, and at related Illinois NAHRO and IAHA conferences, including housing authorities that may be establishing homeownership programs through their Agency Plans.

If the PHA is designated as troubled, describe the manner in which financial assistance will be provided or other assistance

For troubled PHAs, the State can, upon local request, provide outreach and technical assistance in an effort to better assess and evaluate options for improving operations, resolving non-compliance problems, and identifying other housing-related needs and issues.

Discussion:

Due to increased emphasis on further meeting the housing needs of identified populations, the State (primarily through IHDA) plans to continue its funding activities with Public Housing Authorities and their Non-Profit Subsidiaries. IHDA will continue to work with PHAs and their Non-Profit Subsidiaries to do both preservation and single-family new construction for rental housing and homeownership, as well as RAD conversion projects referenced earlier.

AP-65 Homeless and Other Special Needs Activities – 91.320(h)

Introduction

HUD's Continuum of Care (CoC) and Rural Housing Stability Assistance Programs provide major federal funding to promote community-wide commitment to the goal of ending homelessness, supporting efforts by nonprofit providers and State and local governments to quickly re-house homeless individuals and families while minimizing the trauma and dislocation caused to individuals, families, and communities by homelessness. The programs promote access to, and effective utilization of mainstream programs to optimize self-sufficiency among individuals and families experiencing homelessness. Coordination with local CoCs is a major strategy under the State's Emergency Solutions Grants (ESG) Program to end homelessness. ESG prioritizes assistance to Very and Extremely Low Income Households, Homeless and At-Risk Homeless Persons and Families, and Homeless Persons with Disabilities. The State supports applications by eligible CoCs under HUD's Continuum of Care and Rural Housing Stability Assistance Programs, including the review of CoC applications under HUD's programs in order to provide Certifications of Consistency with the State's Consolidated Plan.

HUD's definition of "chronically homeless" assists grantees in focusing their Continuum of Care homeless programs on persons with the longest histories of homelessness, who often also have the highest need.

Under the final rule, chronically homeless means:

(1) A "homeless individual with a disability," as defined in section 401(9) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11360(9)), who:

(i) Lives in a place not meant for human habitation, a safe haven, or in an emergency shelter; and

(ii) Has been homeless and living as described in paragraph (1) (i) of this definition continuously for at least 12 months or on at least 4 separate occasions in the last 3 years, as long as the combined occasions equal at least 12 months and each break in homelessness separating the occasions included at least 7 consecutive nights of not living as described in paragraph (1)(i). Stays in institutional care facilities for fewer than 90 days will not constitute as a break in homelessness, but rather such stays are included in the 12-month total, as long as the individual was living or residing in a place not meant for human habitation, a safe haven, or an emergency shelter immediately before entering the institutional care facility;

(2) An individual who has been residing in an institutional care facility, including a jail, substance abuse or mental health treatment facility, hospital, or other similar facility, for fewer than 90 days and met all of the criteria in paragraph (1) of this definition, before entering that facility; or

(3) A family with an adult head of household (or if there is no adult in the family, a minor head of household) who meets all of the criteria in paragraph (1) or (2) of this definition, including a family

whose composition has fluctuated while the head of household has been homeless.

Every CoC has established a coordinated entry program.

Describe the jurisdictions one-year goals and actions for reducing and ending homelessness including

Reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs

As ESG grantees and State ESG subgrantees, Continuum of Care organizations conduct homeless outreach through their local jurisdictions and set their funding priorities based on the outcome. IDHS collects information from its providers in the annual ESG application. The 2025 State ESG Allocation is \$5,190,081.

The IDoA's Colbert Consent Decree Parties have an Implementation Plan to help coordinate agency services and ease the transition process for Class Members. The Consent Decree and Nursing Home Deflection Program work to prevent future people from entering the institutional system if it is unwanted. DHS' Williams Consent Decree Parties are also working on closing the front door to Institutes for Mental Disease and preventing inappropriate institutionalization in the future.

Addressing the emergency shelter and transitional housing needs of homeless persons

Housing relocation and stabilization services and short- and/or medium-term rental assistance is provided as necessary to help individuals or families living in shelters or in places not meant for human habitation move as quickly as possible into permanent housing and achieve stability in that housing

Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again

Emergency Solutions Grants provide services to aid homeless persons. Services funded include: case management, childcare, education services, employment assistance and job training, outpatient health services, legal services, life skills training, mental health services, substance abuse treatment services, transportation, and services for special populations. The ESG program expects to assist 12,500 Homeless Persons through overnight shelters in 2025.

State efforts to maintain Permanent Supportive Housing (PSH) include the use of national HTF funds for the construction and rehab of PSH units. The State's Illinois Housing Search website also provides

permanent supportive housing to persons experiencing or at risk of homelessness through its Statewide Referral Network units.

Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: being discharged from publicly funded institutions and systems of care (such as health care facilities, mental health facilities, foster care and other youth facilities, and corrections programs and institutions); or, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs

Emergency Solutions Grants aims to provide services to prevent the individual or family from becoming homeless. Services funded include short or medium-term rental assistance and/or rental arrears, utilities, rental application fees, security deposits, last month's rent, utility deposits and payments, moving costs, housing search and placement, housing stability case management, landlord-tenant mediation, tenant legal services, and credit repair.

The majority of Illinois' Continua of Care (CoCs) provide services to homeless youth. Most of these services focus around emergency shelter and transitional or temporary housing; however, some are working to provide permanent supportive housing (PSH) for youth. Some CoCs focus on PSH for the chronic homeless and/or homeless veterans. At least a few CoCs provide emergency shelters, rapid rehousing, homeless prevention, transitional housing, and/or PSH for families. Other strategies to target certain populations include outreach for chronically homeless people; coordinated entry services for veterans; transportation to drop-in services for veterans; and utility and deposit assistance for families and veterans. IDoA's Colbert Consent Decree implementation plan helps coordinate agency services and ease the transition process for Class Members. The Consent Decree and Nursing Home Deflection Program (if continued) work to prevent future people from entering the institutional system if it is unwanted.

The Developmental Disability (DD) Division of IDHS maintains a waiting list for DD Medicaid Waiver services. Homelessness is part of the criteria for immediate enrollment and receipt of DD Waiver services (if determined eligible). Local Independent Service Coordination (ISC) agencies under contract with the Division of DD maintain the waiting list of persons seeking DD Waiver services and make crisis determinations in the communities they serve. They work cooperatively with other public and private agencies to identify individuals with DD in need.

The Division of Mental Health (DMH) expanded permanent supportive housing to include project-based/clustered housing options using existing housing developments in Cook County. IDHS/DMH successfully implemented a Clustered Housing Model pilot on Chicago's north side of PSH units located in close proximity, in a building or buildings closely situated, with 24-hour peer support staff; a second Clustered Housing Model was implemented using a scattered sites, on Chicago's south side, targeting Williams Class Members deemed "Unable to Serve" (class members recommended for community transition, but the selected community provider cannot meet their clinical/support needs for one or

more of the following service needs: financial, medical, medical/diabetes, medication management and/or psychiatric/behaviors). DMH conducted a six-tier initiative analyzing this population, to determine the reasons why certain Class Members are being categorized as Unable to Serve and what might be recommended to reduce that number. DMH also commissioned UIC to do a study on clients who have returned to IMDs to better understand those circumstances.

Discussion

The ESG Program provides homeless prevention assistance funding to its sub-recipients on a two-year cycle under the Consolidated Plan.

Emergency Solutions Grants aim to provide services to aid homeless and at risk of homelessness persons and families. Services funded include: case management, childcare, education services, employment assistance, job training, outpatient health services, legal services, life skills training, mental health services, substance abuse treatment services, transportation, and services for special populations. The providers encourage individuals to gain stability within the community and their life by monitoring their progress and requiring certain goals to be made and attained.

AP-70 HOPWA Goals – 91.320(k)(4)

One year goals for the number of households to be provided housing through the use of HOPWA for:	
Short-term rent, mortgage, and utility assistance to prevent homelessness of the individual or family	45
Tenant-based rental assistance	250
Units provided in permanent housing facilities developed, leased, or operated with HOPWA funds	20
Units provided in transitional short-term housing facilities developed, leased, or operated with HOPWA funds	0
Total	315

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

Introduction:

Ten (10) general statements and potential barriers were included in MA-40, the Market Analysis section of the Five-Year Plan. Discussion on: (1) Building Codes, (2) Home Rule, (3) Impact Fees, (4) Property Taxes, (5) Cost and Availability of Land, (6) Availability of Affordable Housing, (7) Public Housing, (8) Preservation, (9) Homelessness, and (10) Other Special Needs, were included to better describe the regulatory government under which affordable housing in Illinois currently operate

Actions it planned to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment

Actions Planned- These include the following: (1) Continued processing of Housing Affordability Impact Notes for relevant State legislation proposed in the Illinois General Assembly.

To assist in implementing the Local Planning Technical Assistance (LPTA) Act, IHDA continues to work with the Illinois Housing Task Force and other State agencies to research potential local comprehensive planning funding through an inter agency effort.

The State's Rental Housing Support Program helps Illinois families afford safe and decent homes by funding rent subsidies to landlords throughout the state to make rental units affordable to households earning less than 30% of the area median income. A major program goal is to use half of the funding for households who are at 15% of the area median income and below. Funding for the Rental Housing Support Program is provided from a \$20 fee from real estate document recordings. Tenants pay a flat rent of approximately 30% of their income and the local administering agency pays the balance of the rent negotiated with the landlord. RHSP is divided into two sub-programs: (i) the Rental Housing Support Program ("RHS") allows the Authority to contract with agencies throughout the state (Local Administering Agencies); and (ii) the Long Term Operating Support Program, which allows the Authority to directly contract with owners of rental developments.

The federal Housing Trust Fund will provide rental units for Permanent Supportive Housing, affordable to extremely low income households at 30% or less of local AMI across the State

Affordable Housing Planning Appeals Act: IHDA, the administering agency of the AHPAA, produces the non-exempt local communities list every five years. In December 2018, forty-six non-exempt municipalities were identified. IHDA provides technical assistance to municipalities throughout the state to complete and submit affordable housing plans. These efforts include an AHPAA handbook for local officials and administrators. Accessibility: IHDA has an "enhanced accountability" mandated requirement under its LIHTC Qualified Allocation Plan. All applicants must include at least 10% acceptable and 2% memory-impaired units in all projects. To encourage more widespread application,

IHDA provides competitive points for utilizing Universal Housing Design (UHD) features.

Discussion:

HUD's Homeless Continuum of Care funding has remained fairly consistent. While the HEARTH Act requires 25% of funding to be used for permanent supportive housing development, this program isn't triggered until all renewal contracts/grant agreements are met. The Statewide Referral Network (SRN) lists over 2,000 affordable rental housing units for persons/households at 30% AMI or below and who are either homeless/at risk or have a disability. Improvements continue to be made to the system, including integration with the HUD Section 811 Project and Assistance Program. The federal Housing Trust Fund allows for increased production and rehab of additional units affordable to households at or below 30% AMI, and thus increases the State's inventory of Permanent Supportive Housing.

AP-85 Other Actions – 91.320(j)

Introduction:

This section reviews additional actions the State is pursuing to address obstacles to meeting identified needs, lead-based paint abatement, poverty, institutional structure, and monitoring among others.

IHDA's Strategic Planning and Reporting (SPAR) is responsible for issuing Certifications of Consistency with the State Consolidated Plan for covered programs. In doing so, the State will issue Certifications per the final rule as follows: a State Certification that an application is consistent with its housing strategy means that the State Action Plan indicates the State planned to apply for the program or was willing to support an application by another entity for that program; the location of activities is consistent with the geographic areas as specified in the plan; and the activities benefit a category of residents for which the State five-year strategy has an established priority. The State will provide the means for a denial if/when it fails to provide a Certification of Consistency.

Actions planned to address obstacles to meeting underserved needs

LIHTC: One way the State addresses obstacles to meeting its identified needs is through its Low Income Housing Tax Credit (LIHTC) program. The LIHTC program assists in developing affordable housing for identified populations by using indirect federal subsidies to finance the development or redevelopment of affordable rental housing for low-income households (at 60 percent area median income or below). The Internal Revenue Service allocates federal tax credits to state housing finance agencies which then award tax credits to eligible affordable housing developers who use the capital generated from the sale of these tax credits to lower the debt burden on developing these tax credit properties, making it easier to offer lower, more affordable rents. Units must maintain affordable rent for at least 30 years.

There are two types of low income housing tax credits: 9 percent tax credits, and 4 percent tax credits. Nine percent tax credits (competitive tax credits) can subsidize up to 70 percent of the eligible development costs for new construction and substantial rehabilitation of housing projects that are not otherwise subsidized by the federal government. Four percent tax credits (non-competitive tax credits) can be used for rehabilitation projects and when 50 percent or more of a project's eligible cost are financed with tax-exempt private activity bonds.

The Qualified Action Plan (QAP) specifies how states will review, approve, and allocate federal Low Income Housing Tax Credits (LIHTCs). As the State's LIHTC allocating agency, IHDA coordinates the development of the annual Qualified Allocation Plan (QAP). Besides the program's already statutory targeting to households at 60% of area median income or below, IHDA has built a number of factors into its application scoring system to incentivize better targeting to lower-income households. These include the following point categories: Rental Assistance; Unit Mix; Green Building (lower utility bills); Rehabilitation (of existing housing); Community Revitalization Plans; 30% AMI Housing (10-15%); and Statewide Referral Network (SRN) units, which target 10-15% of a property's units to

persons/households who are homeless/at-risk of homelessness or have a disability. All of these scoring criteria are aimed at incentivizing project applications which include deeper targeting to low- and moderate-income families.

The federal Housing Trust Fund expands the State's ability to provide Extremely low-income households affordable rental/PSH housing across the State.

Additionally, Illinois' Supportive Living Program is an affordable assisted living model administered by the Department of Healthcare and Family Services that offers elderly (65 and older) or persons with physical disabilities (22 and older) housing with services. The aim of the Program is to preserve privacy and autonomy while emphasizing health and wellness for persons who would otherwise need nursing facility care. By combining apartment-style housing with personal care and other services, residents can still live independently and take part in decision-making.

The Department of Healthcare and Family Services currently operates this program through a Medicaid waiver which allows payment for services that are not routinely covered by Medicaid. These include personal care, homemaking, laundry, medication supervision, social activities, recreation and 24-hour staff to meet residents' scheduled and unscheduled needs. The resident is responsible for paying the cost of room and board at the facility.

Actions planned to foster and maintain affordable housing

HUD funding recipients must certify compliance with Fair Housing on an annual basis and IHDA will continue to report on the State's actions to address its previously identified fair housing impediments in the State's Consolidated Plan Annual Action Plans and Annual Performance Reports. The Illinois Department of Human Rights, besides processing fair housing complaints as a HUD-designated substantially equivalent agency, conducts presentations and training for government agencies and community-based groups regarding fair housing rights under the Illinois Human Rights Act.- IDHR and IHDA also share fair housing information for wider circulation to other major membership organizations, including Housing Action Illinois (HAI), Supportive Housing Providers Association

Actions planned to reduce lead-based paint hazards

The Lead Poisoning Prevention Act (Public Act 94-0879) sets pre-emptive measures to prevent childhood lead-poisoning, including increased inspections of buildings suspected of containing lead hazards. The LPPA includes provisions barring owners of residential buildings who willfully violate lead safety laws from doing business with the State or any State agency until the violation is mitigated, along with increased fines and mandatory notice to tenants of possible lead hazards in their building.

Significant strengths of the Illinois Lead Poisoning Prevention Act (LPPA) include classifying pregnant persons with elevated blood lead levels as subject to the same IDPH case management and physical response as children, and for the reporting of ALL blood-lead tests in Illinois, along with

restrictions on data disclosure. IDPH is able to issue Emergency Stop Work Orders when public health is in jeopardy as the result of improper work activities disturbing lead bearing surfaces. Enforcement capabilities include cases where violations of the LPPA and the Lead Poisoning Prevention Code (LPPC) have occurred, with penalty provisions in compliance with U.S. EPA requirements for all authorized State programs. Language on lead reporting and lead work activities includes physicians/healthcare providers, laboratories, schools, daycare providers, owners of regulated facilities with an identified lead hazard and both licensed and unlicensed construction industry professionals.

Taking effect in 2025 is a more stringent standard for public health intervention based on childhood blood level testing. Under new Illinois law, any child residing in a high-risk ZIP code is to be tested automatically at 12, 24, and 36 months, and all children six years of age and younger must be assessed for lead exposure through a pediatrician-administered questionnaire.

Illinois' Lead Safe Housing Advisory Council (LSHAC) is composed of advocacy groups, public health, state agency and industry representatives. The work of the LSHAC includes regulatory and legislative recommendations in the areas of screening and prevention, lead safe work practices, education, and funding for the remediation/rehabilitation of housing containing lead poisoning hazards. In response to recommendations in the LSHAC's report, Public Act 95-0492 became law, establishing the window replacement (CLEAR-WIN) program to prevent future cases of lead poisoning by assisting residential property owners reduce lead-paint hazards through window replacement in two pilot areas. An evaluation of CLEAR-WIN pilot program activities in Peoria and the Englewood community in Chicago by the University of Illinois/Chicago (UIC) for HUD exhibited a successful lead dust reduction of over 90% in the homes serviced. The General Assembly used this information to pass a statewide program in 2017.

Actions planned to reduce the number of poverty-level families

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

The HHS-funded Community Services Block Grant (CSBG) Program is the major federally-funded anti-poverty program. Its history goes back to the original Federal Office of Economic Opportunity (OEO), which served to create community action agencies (CAAs) as a necessary link to coordinate these efforts at the local level. It is generally coordinated with other subject-specific programs, and is geared toward enabling low-income persons to become more self-sufficient. It is administered by DCEO at the State level, which funds the statewide network of CAAs and related organizations on an annual basis, contingent on federal funding. Uses of CSBG funds include the following: economic development; education; emergency assistance; health; housing; income management; linkages; nutrition; and self-sufficiency.

DCEO administers both the Low-Income Home Energy Assistance program (LIHEAP) as well as the Illinois Home Weatherization Assistance Program (IHWAP). Which provide utility subsidy assistance and

weatherization improvements to both low-income homeowners and renters.

DCEO also administers the DOL-funded Workforce Investment and Opportunity Act funding, which provides federal funding to workforce development boards (WDBs) throughout the state for local employment and job training programs. The State has coordinated its efforts in this area by establishing Illinois Employment & Training Centers, which include staffing from WDBs, IDES-unemployment assistance and employment data and projections, and IDHS, to provide a one-stop shop for human services.

Actions planned to develop institutional structure

Public Act 100-0833, the Broadband Advisory Council Act created the Broadband Advisory Council under DCEO to expand broadband availability & access throughout Illinois, including unserved urban and rural areas. Steps for the BAC to initiate include literacy programs, programs assisting both older citizens, and the disabled, in accessing broadband; and the encouragement of collaborations with universities/colleges/public housing authorities and other agencies/organizations in furthering access. The Act calls for the assessment of broadband access/barriers to Low-income households “at or below 135% of the poverty guidelines” (U.S. HHS)

The following actions are expected over the next 5 years:

1. Regular meetings of the Illinois Housing Task Force, its Executive Committee, and related Working Groups to develop and implement the State’s Annual Comprehensive Housing Plan.
2. Meetings of the Illinois Housing Task Force, the SPAR Advisory Committee, Lt. Governor’s Rural Affairs Council (and Rural Partners
3. Ongoing assessment of training and technical assistance needs, and the provision of follow-up assistance through program workshops and other identified methods (IHDA, IDHS, IDHR, other agencies).

Development of informational materials on existing and revised Federal and State housing and support services programs via: dissemination of materials at various workshops and conferences; and dissemination of information on new federal and state programs, as they are created in Congress and/or the Illinois General Assembly and/or established or administered by State and local governments

Actions planned to enhance coordination between public and private housing and social service agencies

State activities to enhance coordination between public and assisted housing providers and private and government health, mental health, services, and fair housing agencies have historically been the role of

the Illinois Housing Task Force (IHTF) and its Executive Committee.

Examples of coordination between public and private housing and social service agencies include:

1. IHDA has historically had a strong working relationship with private for-profit and non-profit affordable housing developers and owners, especially on the multi-family side. They are the major applicants under IHDA's loan, tax credit, and rental assistance programs, including HOME, HTF, LIHTC, Affordable housing Trust Fund and Permanent Supportive Housing programs. IHDA works closely with various partners to co-sponsor conferences and trainings, as well as sharing information on new program developments, major revisions, regulatory updates, and the like, via regular newsletters, websites, and related communications.
2. IHDA works with DCEO to coordinate funding for both rehabilitation and new construction rental housing developments being otherwise assisted.
3. IHDA also has had a longstanding working relationship with participating lending institutions, local governments, and non-profit organizations under its homebuyer mortgage financing and down payment assistance programs.
4. Both IHDA and DCEO work with local governments (and in IHDA's case also non-profit organizations) to administer local homeowner housing rehabilitation programs targeted to low/moderate –income households.
5. DCEO also works with local governments on funding and implementing local public works/infrastructure projects to address major health and safety concerns, especially of LMI households. It also works through local governments to fund needed economic development and related infrastructure projects for business expansions which create jobs for LMI persons.

IHDA has worked with homeless assistance agencies which frequently provide services to residents of permanent supportive housing projects which were funded in whole or in part with IHDA resources.

IHDA works with IDHS, IDoA, and IDHFS on the State's long-term care rebalancing strategy, which includes accessing community-based housing and rental assistance for persons exiting institutional housing facilities, including the creation of Permanent Supportive Housing (PSH), Statewide Referral Network (SRN) units, and administering both the HUD section 811 PBRA Program and the Rental Housing Support Program. In addition, IDHS-DMH administers the Bridge Rental Subsidy Program for qualifying persons with mental illness who are also leaving Institutional residential settings.

Discussion:

Under "Actions planned to foster and maintain affordable housing" other proposed IHDA actions:

1. Ongoing administration of the Affordable Housing Planning and Appeals Act Program
2. Providing targeted training on Reasonable Accommodations policy and practice; and
3. Continue inclusion of the 30% preference for Special Needs Tenants under IHDA's Rental Housing Support Program

Supporting uncapped use of national Housing Trust Fund monies to be used for operating rental/assistance for housing for extremely low income households

Program Specific Requirements

AP-90 Program Specific Requirements – 91.320(k)(1,2,3)

Introduction:

For the CDBG Program, the consecutive three-year period that will be used to determine that a minimum overall benefit of CDBG funds is used to benefit persons of low and moderate income is 2025, 2026, 2027. Although the Overall Benefit question is asked below, there is not a space for a response.

Community Development Block Grant Program (CDBG)

Reference 24 CFR 91.320(k)(1)

Projects planned with all CDBG funds expected to be available during the year are identified in the Projects Table. The following identifies program income that is available for use that is included in projects to be carried out.

- | | |
|--|----------|
| 1. The total amount of program income that will have been received before the start of the next program year and that has not yet been reprogrammed | 0 |
| 2. The amount of proceeds from section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives identified in the grantee's strategic plan. | 0 |
| 3. The amount of surplus funds from urban renewal settlements | 0 |
| 4. The amount of any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan | 0 |
| 5. The amount of income from float-funded activities | 0 |
| Total Program Income: | 0 |

Other CDBG Requirements

- | | |
|---|--------|
| 1. The amount of urgent need activities | 0 |
| 2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan. | 70.00% |

HOME Investment Partnership Program (HOME)

Reference 24 CFR 91.320(k)(2)

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

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

2. A description of the guidelines that will be used for resale or recapture of HOME funds when used for homebuyer activities as required in 92.254, is as follows:

While IHDA Multi-family HOME funds are restricted to rental properties, in the event that HUD has requested that the Lender return to HUD all or any portion of the proceeds of the HOME Loan (the "Recapture") that have been disbursed to or for the benefit of the Borrower, the Borrower shall provide such funds to satisfy the Recapture as requested by the Lender, unless recapture is due solely to the actions of the Lender. The occurrence of any Default that has not been cured during any applicable grace or cure period shall give rise to a Recapture. The Borrower agrees to indemnify against and pay IHDA for any damages related to any Recapture that is due and owing. The Borrower must also agree to full and prompt payment, when due, of the Recapture, plus all costs and expenses of collection and default interest as provided in the Financing Documents. The Borrower also agrees to indemnify against and pay IHDA for any damages related to any Recapture that is due and owing.

The HOME regulations require that a house purchased with HOME funds must be kept affordable for an extended period of time through recapture provisions which have been determined by HUD to be appropriate. The period of affordability is based upon the HUD guidelines for the amount of HOME funds per unit and is based on the amount of direct subsidy provided to the homebuyer. Direct subsidy is defined as the amount of assistance provided for down payment and closing costs for homebuyers receiving assistance in the homebuyer-only program. For homebuyers receiving funds for homebuyer with rehabilitation assistance, direct subsidy is the amount of assistance provided for down payment and closing costs plus the difference between the fair market value before rehab and fair market value after rehab. See below for affordability provisions.

HOME FUNDS PROVIDED AFFORDABILITY PERIOD

<\$15,000 5 Years

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

>\$40,000 15 Years

Under the 2025-2029 Consolidated Plans (and previously, the 2020-2024), IHDA is only utilizing

HOME funding for rental housing development/rehabilitation

3. A description of the guidelines for resale or recapture that ensures the affordability of units acquired with HOME funds? See 24 CFR 92.254(a)(4) are as follows:

For single-family programs funded with HOME funds IHDA uses a recapture/repayment approach in lieu of a resale approach. Under the 2025-2029 Consolidated Plan (and the previous 2020-2024 Consolidated Plan), IHDA is only utilizing HOME funding for rental housing development/rehabilitation.

For IHDA multi-family, HOME funds are restricted to rental properties. Recapture is triggered by sale or transfer and only direct subsidy to the buyer may be recaptured. The Authority has established loan restrictions which enable recapture of the HOME subsidy out of net proceeds. The HOME investment amount may be reduced pro-rata based on the time the homeowner has owned and occupied the unit measured against the required affordability period. Net proceeds are defined as the sales price minus loan repayment of superior debt and closing costs. The recapture provisions will be included in a recorded recapture agreement for each unit assisted with HOME funds.

The owner occupied provision of assistance to the homeowner must remain in effect throughout the affordability period. The owner may not relocate and rent their property. Nor may they rent a portion of their property. Violation of the provision will trigger a recapture of all funds not forgiven as of the date of the violation.

While IHDA multi-family HOME funds are restricted to rental properties, in the event that HUD has requested that the Lender return to HUD all or any portion of the proceeds of the HOME loan (the "Recapture") that have been disbursed to or for the benefit of the Borrower, the Borrower shall provide such funds to satisfy the recapture as requested by the Lender, unless such Recapture is due solely to the actions of the Lender. The occurrence of any Default that has not been cured during any applicable grace or cure period shall give rise to a recapture.

The Borrower agrees to indemnify against and pay IHDA for any damages related to any Recapture that is due and owing. The borrower must also agree to full and prompt payment when due of the Recapture, plus all costs and expenses of collection and default interest as provided in the Financing Documents. The borrower also agrees to indemnify against and pay IHDA for any damages related to any Recapture that is due and owing

4. Plans for using HOME funds to refinance existing debt secured by multifamily housing that is rehabilitated with HOME funds along with a description of the refinancing guidelines required that will be used under 24 CFR 92.206(b), are as follows:

For IHDA funding, any proposed rehabilitation project must receive initial approval as part of the Preliminary Project Assessment (PPA). Once approved, the sponsor will submit a full "Common Application" to the Authority including a Property Needs Assessment (PNA), appraisal, and physical and infrastructural reports to complete the HUD ERR. The inclusion of a PNA indicates that rehabilitation is the primary activity of the proposed development. IHDA's "Design, Construction and Regulatory Requirements"(DCR) and the "Common Application" define the threshold factors and cost parameters for rehab projects, in addition to those for new construction. As part of the PPA, a proposed project must also indicate whether, and how, the proposed investment will change the number of affordable units, and unit affordability. The PPA must be approved before a proposed project may be submitted via the "Common Application". See Section 1.2 "Adaptive Reuse and Rehabilitation Requirements" under Design Activities of IHDA's "Design, Construction and Regulatory Requirements".

Any proposed HOME refinance would be subject to IHDA's application process and subject to the Financial Feasibility review contained within the IHDA "Multi-Family Common Application", to ensure compliance with Multi-family underwriting guidelines. The Financial Feasibility component of the "Common Application" assesses whether disinvestment has occurred, and whether the proposed project has the ability to serve the project's targeted population in the long-term. The PPA, PNA, Standard for Construction Cost Estimate (SCCE), "Mandatory Application Checklist", "MF Common Application", the DCR and other relevant HOME application manuals, guidelines, and other publications describing the application criteria are found on the IHDA website at: <https://www.ihda.org/developers/dev-resource-center>.

Periods of affordability comply with 24CFR 92.252: Rehabilitation of existing housing per unit of HOME funds under \$15,000 - 5 years minimum affordability; \$15,000 - \$40,000 10 years minimum affordability; over \$40,000 or rehabilitation involving refinancing - 15 years minimum affordability.

HOME funds cannot be used to refinance multifamily loans made or insured by any federal program, including the Community Development Block Grant Program

5. If applicable to a planned HOME TBRA activity, a description of the preference for persons with special needs or disabilities. (See 24 CFR 92.209(c)(2)(i) and CFR 91.220(l)(2)(vii)).

N/A

6. If applicable to a planned HOME TBRA activity, a description of how the preference for a specific category of individuals with disabilities (e.g. persons with HIV/AIDS or chronic mental illness) will narrow the gap in benefits and the preference is needed to narrow the gap in benefits and services

received by such persons. (See 24 CFR 92.209(c)(2)(ii) and 91.220(l)(2)(vii)).

N/A

7. If applicable, a description of any preference or limitation for rental housing projects. (See 24 CFR 92.253(d)(3) and CFR 91.220(l)(2)(vii)). Note: Preferences cannot be administered in a manner that limits the opportunities of persons on any basis prohibited by the laws listed under 24 CFR 5.105(a).

N/A

**Emergency Solutions Grant (ESG)
Reference 91.320(k)(3)**

1. Include written standards for providing ESG assistance (may include as attachment)

To collaborate with the Continuum of Care's (CoC's), applications will be sent annually to obtain CoCs funding recommendations. Applications from CoCs and subrecipients will be reviewed by ESG staff, determinations will be made and award letters will be distributed. Awards will be made based upon release of funds from HUD. All DHS grant terms are July 1st through June 30th. For complete written standards please refer to the IDHS website at IDHS: SECTION 3: Continuum of Care & Service Coordination Requirements (state.il.us).

2. If the Continuum of Care has established centralized or coordinated assessment system that meets HUD requirements, describe that centralized or coordinated assessment system.

The State of Illinois is not a Continuum of Care organization. There are 18 CoC organizations within the State that address this issue independently.

3. Identify the process for making sub-awards and describe how the ESG allocation available to private nonprofit organizations (including community and faith-based organizations).

The Continuum of Care organizations provide a funding plan describing the performance measures and how those measures will be achieved. They also provide recommended funding by activity and agency within their CoC.

4. If the jurisdiction is unable to meet the homeless participation requirement in 24 CFR 576.405(a), the jurisdiction must specify its plan for reaching out to and consulting with

homeless or formerly homeless individuals in considering policies and funding decisions regarding facilities and services funded under ESG.

The State of Illinois requires that all entities receiving ESG funds have a homeless or formerly homeless individual on their board or their policymaking entity.

5. Describe performance standards for evaluating ESG.

100% of all subrecipients of ESG Program funds:

1. must ensure that all ESG funds are used in accordance with all federal program requirements at 24 CFR Part 576
2. must comply with DHS policies, reporting requirements, community service agreement obligations, department regulations, and deliverables in addition to all the ESG requirements in 24 CFR Part 576
3. are required to complete and submit accurate and timely annual Funding Applications that include but are not limited to providing staffing levels, program data, supportive service, and fiscal information in addition to submitting all requested attachments and certifications to DHS on or before the application deadline date.
4. will be limited to 60% of the agency's total fiscal year allocation for street outreach and emergency shelter activities as set forth in 24 CFR Part 576
5. must provide matching contributions from eligible sources in an amount equal to the amount of requested ESG Program funds from the subrecipient for all activities as prescribed in 24CFR Part 576. At a minimum, 25% of the match contributions must be cash.
6. must obtain written approval from DHS prior to sub-granting any portion of ESG Program funds to any other entity to perform ESG eligible activities.
7. must obtain written agreements from all ESG subgrantees requiring the subgrantee to comply with all DHS policies and timelines, the provisions of the DHS community service agreement, and all program rules and regulations as set forth by DHS and 24 CFR Part 576, which is identical to the obligations of the ESG subrecipients.
8. must provide DHS with accurate quarterly fiscal and service ESG reports on a quarterly basis.

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

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

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

Applications submitted by eligible recipients

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

N/A

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

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

Non-profit, for-profit, and joint-venture developers are eligible to apply for funds under the Permanent Supportive Housing Development Program. PSH development and operation requires knowledge and skill sets that may not currently exist in full at any one organization. Projects that build on the strengths of several organizations, including development partners, will be accepted. The roles, responsibilities, and capacity (including financial capacity) of each entity will be analyzed. In circumstances where both (1) IHDA is unable to fully expend its Housing Trust Fund allocation under its PSH funding round(s) and (2) its Housing Trust Fund allocation is nearing or at risk of expiration, IHDA may also disburse the remainder of its Housing Trust Fund allocation to projects seeking funding outside its PSH funding round(s) to support ELI units (serving 30% AMI or below) that also meet Housing Trust Fund standards, with a priority for projects that contain ELI units that also meet IHDA's definition of Supportive Housing Units above required minimums identified in the LIHTC QAP. In cases where the source of funding is the federal Housing Trust Fund, eligible applicants must meet all Authority standards including standards set out in 24 CFR 93.2 for the federal Housing Trust Fund

(1) Make acceptable assurances to the grantee that it will comply with the requirements of the HTF program during the entire period that begins upon selection of the recipient to receive HTF funds, and ending upon the conclusion of all HTF-funded activities;

(2) Demonstrate the ability and financial capacity to undertake, comply, and manage the eligible activity;

(3) Demonstrate its familiarity with the requirements of other federal, State, or local housing programs that may be used in conjunction with HTF funds to ensure compliance with all applicable requirements and regulations of such programs; and

(4) Have demonstrated experience and capacity to conduct an eligible HTF activity as evidenced by its ability to:

(i) Own, construct, or rehabilitate, and manage and operate an affordable multifamily rental housing development; or

(ii) Design, construct, or rehabilitate, and market affordable housing for homeownership.

(iii) Provide forms of assistance, such as down payments, closing costs, or interest rate buy downs for purchasers

b. Describe the grantee's application requirements for eligible recipients to apply for HTF funds. If not distributing funds by selecting applications submitted by eligible recipients, enter "N/A".

IHDA will use its Multifamily Financing "Common Application" as the major application format for federal HTF rental housing projects, the same as used for the LIHTC and HOME programs, along with supplemental information required by program rules (see Permanent Supportive Housing Development Program Request for Application). IHDA's process will include a mandatory concept meeting with the Authority, a Preliminary Project Application (as defined in the RFA) an initial completeness/eligibility scoring, review of mandatory requirements, underwriting, site and market review, peer review, internal Loan Committee and IHDA Board approval. Federal HTF funds will only be applied to units restricted to tenants at 30% AMI or below. The balance of the units that are not 30% AMI or below will be paid for with other IHDA or leveraged sources. Under the RFA, requests for funding may not exceed 90% of total project cost. Under the RFA, the Maximum Grant Limit is \$10,000,000, not to exceed 90% of total project cost.

c. Describe the selection criteria that the grantee will use to select applications submitted by eligible recipients. If not distributing funds by selecting applications submitted by eligible recipients, enter "N/A".

If an applicant meets the mandatory thresholds below, IHDA will review eligible recipients in accordance with CFR 91.320 (k)(5)(i), which will include supplemental information required by program rules (see Permanent Supportive Housing Development Program RFA) In addition to the review of mandatory requirements, IHDA's process will include an initial completeness/eligibility scoring, underwriting, site and market review, peer review, internal Loan Committee and IHDA Board approval.

d. Describe the grantee’s required priority for funding based on geographic diversity (as defined by the grantee in the consolidated plan). If not distributing funds by selecting applications submitted by eligible recipients, enter “N/A”.

The State will distribute HTF funds statewide, including the City of Chicago, Chicago Metro, Other Metro, Non-Metro and municipalities subject to the prioritizing applications that are consistent with the 2025-2029 Consolidated Plan, Section AP-50 Geographic Distribution. The Authority puts a high value on quality location of projects and availability of resources and access to amenities. IHDA will strive to achieve maximum geographic diversity based on statewide applications and, where applicable, aligning set-asides associated with other programs providing non-federal, leveraged funding to the HTF, rather than establish geographic set asides under the HTF. In an effort to increase geographic diversity, IHDA will provide application workshops based upon approved PPAs, including "virtual" workshops in response to declared public health and/or disaster concerns

e. Describe the grantee’s required priority for funding based on the applicant's ability to obligate HTF funds and undertake eligible activities in a timely manner. If not distributing funds by selecting applications submitted by eligible recipients, enter “N/A”.

The Authority will evaluate the Development Team’s capacity to successfully complete and manage the Project. Applicants who fail to meet these mandatory criteria will be disqualified. Applications must include the following:

Organizational Flow Chart

Identity of Interest Certification

Development Team Certification

Unacceptable Practices

The Authority may deny any Project in which any Participant in the Development Team has failed to demonstrate ongoing proficiency with affordable and supportive housing programs. The Applicant may include in the Application an explanation of the circumstances surrounding the unacceptable practice and the roles of each of the Participants. Examples of unacceptable practices include, but are not limited to:

- A Participant is affiliated with existing developments which have been cited for material and/or continuing, but curable, non-compliance. Material non-compliance exists when a party exhibits a continual pattern of non-compliance, or when a party demonstrates an inability or an unwillingness to

resolve non-compliance in a timely manner

- A Participant (including any affiliates) has experienced any events of foreclosure or failed to perform under the terms of a workout agreement over the past three (3) years
- A Participant (including any affiliates) has declared bankruptcy over the past three (3) years
- Any Participant (including any affiliates) has a mortgage default or arrearage of three months or more within the last three (3) years
- A Participant that has failed to pay any fee or expense due to the Authority, including outstanding compliance monitoring fees in the past three (3) years
- Any liens or other claims exist against property owned by Owner (including any affiliates) for which the Owner has failed to resolve a public filing such as a lien or a judgment
- The Owner (including any affiliates) has been debarred or received a limited denial of participation in the past three (3) years by any federal or state agency from participating in any development program
- A Participant that has materially misrepresented facts on any request for Authority resources

f. Describe the grantee's required priority for funding based on the extent to which the rental project has Federal, State, or local project-based rental assistance so that rents are affordable to extremely low-income families. If not distributing funds by selecting applications submitted by eligible recipients, enter "N/A".

As stated in the PSH RFA, projects that provide rental or operating assistance will be awarded up to twenty (20) points based on the number of units assisted and the length of committed assistance. Units can be assisted with available federal, State, and local project-based rental assistance so that rents are affordable to ELI families. These may include: Section 8 Project-Based (preservation only); Project-Based Vouchers; Rental Housing Support Program; and Section 811 Project-Based Rental Assistance. It will utilize 30% of household income for rents and utilities as its standard

g. Describe the grantee's required priority for funding based on the financial feasibility of the project beyond the required 30-year period. If not distributing funds by selecting applications submitted by eligible recipients, enter "N/A".

As stated in the Permanent Supportive Housing RFA, all applicants must restrict 50% of the units to households $\leq 30\%$ AMI. All projects will be required to establish a minimum 30-year affordability period. Applicants who fail to meet these mandatory criteria will be disqualified and will not be scored during the final evaluation phase.

As stated in the RFA, Projects will be required to execute a Regulatory Agreement with the Authority, whereby the Owner shall agree to maintain unit affordability, and serve the targeted populations, for a minimum 30-year period

h. Describe the grantee's required priority for funding based on the merits of the application in meeting the priority housing needs of the grantee (such as housing that is accessible to transit or employment centers, housing that includes green building and sustainable development features, or housing that serves special needs populations). If not distributing funds by selecting applications submitted by eligible recipients, enter "N/A".

As stated in the Permanent Supportive Housing RFA, all Applications must include a signed Permanent Supportive Housing Development Program Application Certification.

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

Be willing to accept current or future State-administered operating subsidy or project based rental assistance, should it become available, on units that are not already subject to a rental assistance contract. Certification of this willingness will not be required of those with already-committed rental or operating assistance for 100% of the PSH units. This assistance would likely be limited to a maximum of 25% of units within a given Project, would likely be reserved for households referred through a statewide referral network, and may be targeted to Projects located in specific areas of the State based on need.

Projects will also be scored on the following items that meet the housing needs of the State. See

Permanent Supportive Housing RFA for information on Application Scoring Criteria.

1. Leveraging Other Sources of funding - Up to fifteen (15) points
2. Firm Commitment of Operating or Rental Assistance - Up to twenty(20) points
3. Universal Design - Up to ten (10) points
4. Green Design and Energy Efficiency - Up to ten (10) points
5. Access to Transportation - Up to ten (10) points
6. Coordination with other State Agencies - Up to ten (10) points
7. Coordination of services - Up to five (5) points
8. Neighborhood Assets - A maximum of ten (10) points
9. Development Team Characteristics - Up to five (5) points
10. Supportive Housing Institute/Predevelopment Certification - Up to eight (8) points.
11. Statewide Referral Network Participation - Up to two (2) points

i. Describe the grantee's required priority for funding based on the extent to which the application makes use of non-federal funding sources. If not distributing funds by selecting applications submitted by eligible recipients, enter "N/A".

Projects which are able to commit other non-federal funds as part of their project financing will be awarded up to fifteen (15)points. This would include other State-funded and locally funded programs but not LIHTC, or State or local CDBG or HOME funding. The latter funds can be part of the project's financing, but will not be considered as non-federal funding. IHDA will require under the PSH-RFA that federal HTF-funded projects include leveraging of at least 10% of total projects cost with non-IHDA resources.

4. Does the grantee's application require the applicant to include a description of the eligible activities to be conducted with HTF funds? If not distributing funds by selecting applications submitted by eligible recipients, select "N/A".

Yes

5. Does the grantee's application require that each eligible recipient certify that housing units assisted with HTF funds will comply with HTF requirements? If not distributing funds by selecting applications submitted by eligible recipients, select "N/A".

Yes

6. Performance Goals and Benchmarks. The grantee has met the requirement to provide for performance goals and benchmarks against which the grantee will measure its progress, consistent with the grantee's goals established under 24 CFR 91.315(b)(2), by including HTF in its housing goals in the housing table on the SP-45 Goals and AP-20 Annual Goals and Objectives screens.

Yes

7. Maximum Per-unit Development Subsidy Amount for Housing Assisted with HTF Funds. Enter or attach the grantee's maximum per-unit development subsidy limits for housing assisted with HTF funds.

The limits must be adjusted for the number of bedrooms and the geographic location of the project. The limits must also be reasonable and based on actual costs of developing non-luxury housing in the area.

If the grantee will use existing limits developed for other federal programs such as the Low Income Housing Tax Credit (LIHTC) per unit cost limits, HOME's maximum per-unit subsidy amounts, and/or Public Housing Development Cost Limits (TDCs), it must include a description of how the HTF maximum per-unit development subsidy limits were established or a description of how existing limits developed for another program and being adopted for HTF meet the HTF requirements specified above.

The State's policy on maximum per-unit subsidy is to be based on modest housing units with similar amenities and taking into account local market conditions. IHDA will use the same criteria that it uses under its HOME/Qualified Allocation Plan (QAP). These limits will be based on hard construction costs. Location factors in to the variance between the Chicago and Metro set-asides and separating Other Metro and Non-Metro set-asides.

These standards were established by an analysis of the current Construction Cost Database for issuance with the 2024-2025 QAP. IHDA will provide non-federal funds to areas where needed, to bridge gaps between maximum per-unit costs under the federal HTF and actual construction cost within IHDA's Cost Limits.

The total cost-per unit takes into consideration soft costs, which are based on the statewide cap, and will not exceed 20% of allowable hard costs for this program. The total cost will be based on geographic location as explained above.

8. Rehabilitation Standards. The grantee must establish rehabilitation standards for all HTF-assisted housing rehabilitation activities that set forth the requirements that the housing must meet upon project completion. The grantee's description of its standards must be in sufficient detail to determine the required rehabilitation work including methods and materials. The standards may refer to applicable codes or they may establish requirements that exceed the minimum requirements of the codes. The grantee must attach its rehabilitation standards below.

In addition, the rehabilitation standards must address each of the following: health and safety; major systems; lead-based paint; accessibility; disaster mitigation (where relevant); state and local codes, ordinances, and zoning requirements; Uniform Physical Condition Standards; Capital Needs Assessments (if applicable); and broadband infrastructure (if applicable).

IHDA uses the Design, Construction, and Regulatory Compliance Review (DCR) to evaluate all rehabilitation projects. The DCR is a comprehensive reference for owners, developers, architects and contractors in the design and construction of quality affordable housing. IHDA uses the DCR to evaluate plans, specifications and other relevant data of the proposed new construction, adaptive reuse, and rehabilitation of existing buildings.

1. Applicable State and local code, ordinances and zoning requirements
2. Health and Safety
3. Requirements of useful life of major systems
4. Lead based Paint Requirements
5. Accessibility Standards which must be met
6. Disaster mitigation requirements
7. State and Local Codes, Ordinance, and Zoning Requirements
8. Uniform Physical Condition Standards

Disaster Mitigation - The State of Illinois does not maintain a statewide adopted building code. Each local governmental unit (municipality or county) adopts its own individual building or other administrative code. IHDA relies on these local Authorities Having Jurisdiction (AHJ) to provide plan review and issue building permits per their adoptive standards. If there is an area which does not have an adopted standard, the IHDA DCR document indicates the building shall be constructed to meet the latest version of the International Code Suite. The use of standard building codes, by either the AHJ or

IHDA referenced requirement, ensures facilities are built to handle regional requirements for seismic (earthquake), wind (tornado or straight line winds) or water (rain, snow, flood) based disasters. By the AHJ issuing the building permit it is expected the plans have been reviewed against the local standard outlined in their adopted building codes, and meet these requirements.

UPCS Protocols and National Standards for the Physical Inspection of Real Estate (NSPIRE) - NSPIRE implements inspections supports year-round maintenance practices. However, HOME, Housing Trust Fund, Section 8 Mod Rehab, Section 811 Project Rental Assistance, Long Term Operating Support (LTOS) and developments participating in the State Referral Network will remain under UPCS standards. An IHDA Construction Representative will make a visit to each unit and evaluate the site against the UPCS checklist (Uniform, Physical Condition Standards for Multifamily Housing Rehabilitation (at <https://www.ihda.org/developers/dev-resource-center/>) to ensure they meet with minimum requirements. The checklist will be used in conjunction with the previously completed Property Needs Assessment (see PNA below) to establish the minimum scope to be included with any rehabilitation project approved for funding. This checklist has been created to have separate lists for multi-family dwellings and single family homes.

The UPCS checklist shall identify any repair items that represent an immediate threat to health and safety, and all other significant defects, deficiencies, items of deferred maintenance, and material building code violations that would limit the expected useful life of major components or systems. Deficiencies regarding significant life safety issues must be identified and identified as work to be immediately corrected as part of the scope of work.

Post-occupancy, IHDA's Asset Management Services Department will review the ongoing project needs utilizing HUD's Uniform Physical Condition Standards to ensure HTF-assisted projects and units will be decent, safe, sanitary and in good repair as described in 24 CFR 5.703

DESIGN, CONSTRUCTION & REGULATORY COMPLIANCE (DCRC) REQUIREMENTS

Update Summary

10.21.24

In addition to spelling corrections and formatting modifications, the following substantive changes are included in this update for Quarter 4 of 2024.

CHAPTER	PAGE	SECTION	ISSUE	RESOLUTION
Design	3	Standards & Codes	Addition	Add the following: <i>"Enterprise Green Communities Criteria"</i>
Design	23	3.2	Modification - Landscaping	Remove the following: <i>"Landscaping shall comply with the local jurisdiction's zoning or building code. The minimum cost for the landscaping shall be 1% of the hard construction cost of the project. Landscaping hard costs include vegetation, decorative hardscape, fencing, irrigation, path lighting not required for code and site furnishings."</i> Add the following: <i>"Landscaping shall minimally comply with the local jurisdiction's zoning or building code. Natural grass seed or sod shall be applied where there is no hardscaping. Trees, with a minimum 2-1/2" DBH, shall be provided to create shade, and/or a natural environmental barrier. Planting beds shall be provided near all site and building entrances, strategically placed along walkways, sitting areas, gathering zones and open areas to create visual interest. Planting beds cannot be left bare and shall be maintained throughout the loan period. Arrangements in the beds shall be layered with plants, shrubs and low growing plants to add texture, variegated seasonal color and have enough depth to allow for a mixed arrangement of multiple compatible plant varieties. Where roof top access for tenants is designed, the planting strategies shall be considered to promote low maintenance and mental well-being. All plants shall be native and non-invasive to the project's region. In</i>

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DESIGN, CONSTRUCTION & REGULATORY COMPLIANCE (DCRC) REQUIREMENTS

Update Summary

10.21.24

In addition to spelling corrections and formatting modifications, the following substantive changes are included in this update for Quarter 4 of 2024.

CHAPTER	PAGE	SECTION	ISSUE	RESOLUTION
				<i>total, above ground planters, planting beds, and tree beds shall not be less than 20% of the total hardscaping area. Turf grass and community vegetable gardens are excluded from the 20% total area calculation."</i>
Design	24	3.3.2	Modification - Playground	<p>Remove the following: <i>"For properties without tenant age restrictions, provide a fully equipped playground or tot lot appropriately sized for the project unless otherwise approved by the Authority. An accessible route to the playground must be provided. The ground surface of the play area shall be stable, firm and slip resistant. Where play components are provided, they shall be ADA compliant."</i></p> <p>Add the following: <i>"For properties without tenant age restrictions, provide a fully equipped playground or tot lot appropriately sized for the project unless otherwise approved by the Authority. An accessible route to the playground must be provided. The ground surface of the play area shall be stable, firm and slip resistant. Where play components are provided, they shall be ADA Compliant. For properties where a playground meets IHDA's requirements identified below and is located within 1/2 mile of the project site, a playground will not be required."</i></p> <p>Add the following: <i>"Vendor proposals shall be coordinated with the plans and submitted with the Plan Review package."</i></p>

DESIGN, CONSTRUCTION & REGULATORY COMPLIANCE (DCRC) REQUIREMENTS

Update Summary

10.21.24

In addition to spelling corrections and formatting modifications, the following substantive changes are included in this update for Quarter 4 of 2024.

CHAPTER	PAGE	SECTION	ISSUE	RESOLUTION
Design	28	4.4.2	Addition - Plumbing	Modify the following in the Fixture / Water Conservation Minimums Table: "Bathroom faucets (public use): 0.50 GPM" Add the following in the Fixture / Water Conservation Minimums Table: "Bathroom faucets (private use): 1.5 GPM"
Design	31	4.6.1	Modification - Community Room	Remove the following: "Provide a kitchen that at a minimum has a sink, range/oven, refrigerator, base, and overhead storage. In municipalities requiring a commercial range hood above a range, the range/oven may be omitted, but a letter confirming this requirement as part of the municipal code must be provided to the Authority for review. A microwave is not a substitute for a range/oven." Add the following: "Provide a kitchen that at a minimum has a sink, cooktop-oven, refrigerator, base, and overhead storage. In municipalities requiring a commercial range hood above a range, the cooktop-oven may be omitted, but a letter confirming this requirement as part of the municipal code must be provided to the Authority for review. The cooktop-oven appliance requirement can be substituted with a microwave-oven appliance incorporating GE Advantium Technology or equivalent."
Construction	39	2.1.2	Modification - Stored Materials	Add the following to the end of the second sentence: "...without prior approval from the Authority."
Construction	47	2.3	Modification - Change Management	Remove the following: "Contractors and applicants shall not enter into any agreement accessing or splitting

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DESIGN, CONSTRUCTION & REGULATORY COMPLIANCE (DCRC) REQUIREMENTS

Update Summary

10.21.24

In addition to spelling corrections and formatting modifications, the following substantive changes are included in this update for Quarter 4 of 2024.

CHAPTER	PAGE	SECTION	ISSUE	RESOLUTION
				<p><i>applicant contingency or realized trade line savings."</i></p> <p>Add the following: <i>"Contractors and applicants shall not enter into any agreement accessing or splitting applicant contingency or realized construction savings at project completion."</i></p>
Construction	47	2.3	Modification - Change Management	<p>Remove the following under CO Determination Criteria for Unforeseen Condition, Concealed Condition: <i>"The Authority expects the design team to have completed an adequate amount of selective demolition for renovation projects to properly anticipate concealed conditions prior to the completion of the construction documents."</i></p>
Appendix	V	Key Term Definitions	Modification	<p>Remove the following under Covered Materials (BABA): <i>"All iron and steel; all manufactured products and all construction materials."</i></p> <p>Add the following under Covered Materials (BABA): <i>"All iron and steel; all manufactured products and all construction materials which are defined as articles, materials, or supplies that consist of only one of the following items: non-ferrous metals, plastic and polymer-based products (including polyvinylchloride, composite building materials, and polymers used in fiber optic cables), glass (including optic glass), fiber optic cable (including drop cable), optical fiber, lumber, engineered wood, and drywall."</i></p>

DESIGN, CONSTRUCTION & REGULATORY COMPLIANCE REQUIREMENTS

OCTOBER 21, 2024

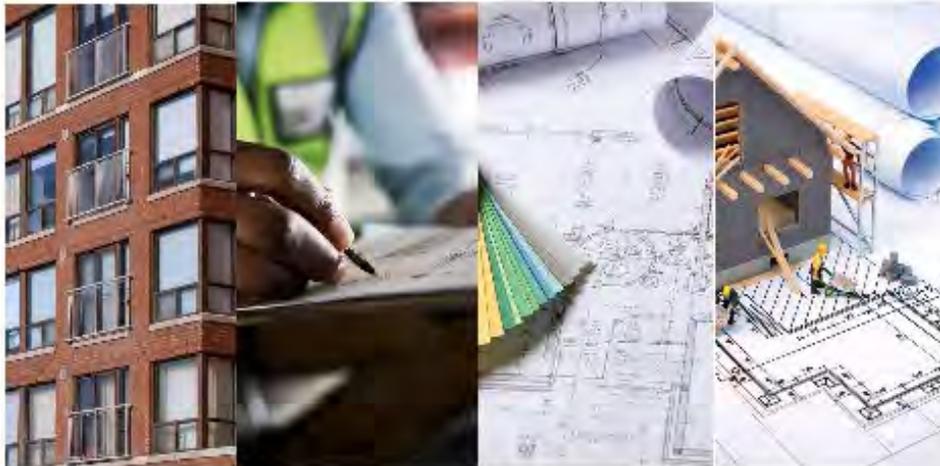


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Design, Construction & Regulatory Compliance Requirements
Version: 2024-10-21



INTRODUCTION

INTRODUCTION



INTENT

The Design, Construction & Regulatory Compliance Requirements (Requirements) have been developed to provide development teams, receiving Illinois Housing Development Authority (IHDA, or Authority) resources, a reference document outlining IHDA's requirements for the design and construction of high-quality affordable housing, including new construction, rehabilitation, and adaptive reuse of existing buildings. The Requirements are intended to be used when submitting applications for IHDA programs including 9% Low Income Housing Tax Credit (LIHTC), 4% LIHTC and Permanent Supportive Housing (PSH). The Design, Construction & Regulatory Compliance team will use the Requirements as a reference when reviewing the submitted property due diligence documents, project scope documents, design and construction documents, and when monitoring the progress of construction.

The Requirements support the Authority's mission of "Financing the creation and preservation of affordable housing in Illinois." To that effort the Requirements have been developed to meet the following objectives:

- The development of housing meets, and in certain areas, exceeds the applicable standards and codes.
- The development of housing incorporates requirements of accessibility which benefit individuals with mobility and sensory impairments.
- The development of housing incorporates principles of sustainability with a focus on energy efficiency and healthy environments which benefit both owners and residents.

The Requirements supersede all other IHDA documents developed to identify design and construction requirements for developments and will be updated on a regular basis to continue to align with industry standards. The Requirements are not intended to identify all project situations and we acknowledge that some projects have unique aspects which will need to be reviewed on a case-by-case basis.

STANDARDS AND CODES

The Requirements are based on compliance with codes required by the Authority Having Jurisdiction (AHJ) or the most recent edition (unless noted otherwise) of applicable standards and codes. It is the responsibility of the development team to verify which standards and codes are applicable to their respective project. Therefore, the following list of potential applicable standards and codes is provided as a reference only and is not intended to be all inclusive:

- Americans with Disabilities Act Standards
- ASHRAE 62.2
- ASHRAE Standard 90.1
- ASTM Standard E779
- ASTM Standard E1527 Environmental Assessment Standards and Risk Management Standards
- ASTM Standard E1903
- Carbon Monoxide Alarm Detector Act (Public Act 094-0741)

INTRODUCTION



- Code of Ethics and Standards of Practice for Environmental Professionals (from the National Association of Environmental Professionals)
- Code of Federal Regulations (Title 29 CFR, parts 1, 3, 5, 6, and 7)
- Contract Work Hours and Safety Standards Act
- Davis-Bacon Act or Illinois Prevailing Wage Act (820 ILCS 130/0.01)
- Enterprise Green Communities Criteria
- National Archives and Records Administration Electronic Code of Federal Regulations, Subpart B – Definitions and References (Section 312.10)
- ICC/ANSI A117.1 (2009)
- HUD Minimum Property Standards (for projects receiving federal financial assistance)
- HUD Title 24 CRF 8.23 (for projects receiving federal financial assistance)
- Illinois Accessibility Code
- Illinois Department of Public Health, IEPA, and EPA 40 CFR 61.145
- Illinois Energy Conservation Code
- Illinois State Plumbing Code
- International Code Council Suite (if no building code adopted within the AHJ)
- Local Fire and Life Safety Code or National Fire Protection Association (NFPA) Life Safety Code 101
- Manuals J and S of the Air Conditioning Contractors of America or the ASHRAE Handbook of Fundamentals
- National Electrical Code
- Smoke Detector Act (Public Act 425 ILCS 60)
- United States Department of Energy REScheck or COMcheck

ORGANIZATION

The Requirements are organized to reflect and align with IHDA's process for awarding, reviewing, and monitoring projects, with IHDA resources, as follows:

- **Pre-Design Activities (PD):** The requirements identified in this chapter pertain to the activities required to gather the project site documentation, establish the project development scope, develop the project estimate of probable construction cost, and identify the project team, many of which occur during the application phase starting with the PPA and ending with an award of IHDA resources.
- **Design Activities (DES):** The requirements identified in this chapter pertain to the activities required to design the project and develop the construction documents which occur after the award of IHDA resources and ending with the initial closing of the project.
- **Construction Activities (CONS):** The requirements identified in this chapter pertain to the activities required to monitor the progress of construction starting after the initial closing of the project and ending with the final closing of the project, at which point the development is ready for occupancy.

INTRODUCTION



Each chapter is organized into three sections, as follows:

- **Overview:** An overview of the activities.
- **Requirements:** A detailed listing of the requirements.
- **Deliverables and Review Process:** A detailed listing of the required deliverables. An overview of the various processes for reviewing required deliverables.



PRE-DESIGN ACTIVITIES

PRE-DESIGN ACTIVITIES



OVERVIEW

Pre-Design Activities are focused on obtaining and reviewing project site documentation, the project development scope, the project estimate of probable construction cost, and the project team to assist IHDA in the evaluation of the project's overall feasibility.

This chapter is organized as follows:

REQUIREMENTS

1. Project Site Documentation
2. Project Scope Development
3. Project Estimate of Probable Construction Cost
4. Project Team

DELIVERABLES AND REVIEW PROCESS

PRE-DESIGN ACTIVITIES



REQUIREMENTS

1. PROJECT SITE DOCUMENTATION

1.1 ENVIRONMENTAL ASSESSMENT

As part of the Application for Multifamily Financing, IHDA requires applicants to submit Environmental Reports prepared by an environmental professional, including the following:

- a. Phase I, Phase II (if recommended in the Phase I), and additional documentation identified below. The submitted Phase I Environmental Report shall meet the requirements of the **ASTM Standard E1527** and be dated no later than 180 days prior to the application date. If the date of the report is later than 180 days prior to the application date, an update to the report must be provided no later than 90 days prior to initial closing. If the date of the report is later than 1 year prior to the application date, a new report must be provided no later than 90 days prior to initial closing. Utilize the Phase I Environmental Report Checklist as a guide for what documentation should be included. The submitted Phase II Environmental Report shall meet the requirements of the **ASTM Standard E1903-11**.
- b. Asbestos Containing Materials (ACM) Survey Report. All state and federally assisted projects must comply with **EPA 40 CFR 61.145** and all other HUD and Illinois Department of Public Health (IDPH) regulations.
- c. Lead Based Paint (LBP) Survey Report. All federally assisted projects having units constructed before 1978 must comply with **Title X of the Housing and Community Redevelopment Act of 1992 regulations found in HUD Title 24 CFR Part 35** and the **Illinois Lead Poisoning Prevention Code, 77 IL. Admin. Code 845**. In addition, all properties and/or units must comply with the Environmental Protection Agency, final rule developed under the Toxic Substances and Control Act, specifically **40 CFR Part 745**, as it relates to the Lead Renovation, Repair, and Painting Program.
- d. Radon Test Report. The submitted Radon Test Report shall meet the requirements of the **ANSI/AARST radon testing standards**.

If a Part 58 review is required for the project, IHDA, as the Responsible Entity (RE) will complete the review, utilizing the required environmental reports and additional documentation provided as a part of the Application. No additional documentation is required.

1.2 HISTORIC PRESERVATION

In the State of Illinois, the State Historic Preservation Officer (SHPO) at the Illinois Department of Natural Resources (IDNR) must review and grant approval to proceed after verifying compliance with Section 106 for federally funded projects and State 707 for non-federally funded projects. The SHPO review process with IDNR takes a minimum of 30 days. IHDA will request SHPO approval directly from IDNR.

PRE-DESIGN ACTIVITIES



As a part of the Application for Multifamily Financing, IHDA requires applicants to provide a Historic Preservation Checklist, including required supporting documentation. IHDA will submit the historic review package to IDNR/SHPO for review and approval.

1.3 PROPERTY NEEDS ASSESSMENT

As part of the Application for Multifamily Financing, IHDA requires applicants that are working on the rehabilitation or adaptive reuse of a property to provide a Property Needs Assessment (PNA) by an independent third-party consultant. The submitted PNA shall meet the requirements of **ASTM E2018-15 Standard Guide for Property Condition Assessment: Baseline Property Condition Assessment Process** and be dated no later than 180 days prior to the application date. The following additional requirements must also be met:

- a. IHDA must be explicitly addressed as being able to rely on the PNA.
- b. Include an ASHRAE Level 2 Energy Audit.

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

# OF UNITS	MINIMUM UNIT OBSERVATIONS
4 - 75	50%
76+	25%

- a. At all properties, a minimum of 25% of each unit type must be included in observations.
- b. At scattered site properties (with multiple apartment buildings), the minimum unit requirements apply to each building.
- c. At all properties, the minimum units observed can include up to 50% of vacant units.
- d. At all properties, 100% of units in a Non-Rentable status must be observed. Non-Rentable units can be defined as a unit that is in a damaged condition (e.g. fire, mold) or under renovation or repair.
- e. For all PNA reports, the consultant shall provide a residential unit matrix of existing units including unit type, approximate square footage, occupancy status, and indicating the units observed during the property walkthrough.

1.4 PROPERTY SURVEY

After award and as part of the project due diligence prior to initial closing, IHDA requires applicants to provide an ALTA survey by a licensed surveyor.

The submitted survey shall meet the requirements of the **2021 Minimum Standard Detail Requirements for ALTA/NSPS Land Title Surveys** (Survey Standards) as established and adopted by the American Land Title Association and the National Society of Professional

PRE-DESIGN ACTIVITIES



Surveys and be dated no later than 180 days prior to the initial closing date. The following additional requirements shall also be met:

- a. Certified by the surveyor to IHDA, borrower/owner and the title company that the survey has been prepared in accordance with the standard.
- b. The survey shall not contain a reference that it is made for loan purposes only.
- c. The following items, as identified on Table A, Optional Survey Responsibilities and Specifications, of the Survey Standards: 1, 3, 4, 6(a), 6(b), 7(a), 7(b)(1), 7(b)(2), 7(c), 8, 9, 10, 11(a), 11(b), and 20.
- d. Per item 20, as identified on Table A of the Survey Standards, the following additional requirements shall be included as to whether the property:
 - Is located in a classified zone 1 (red zone) radon area.
 - Encompasses an area of protected wetlands.
 - Incorporates an engineered barrier encapsulating contaminants.

2. PROJECT SCOPE DEVELOPMENT

As a part of the Application for Multifamily Financing, IHDA requires applicants to provide a project development scope ("scope") based on a review of the project site documentation including but not limited to the environmental assessment, the PNA, and the property survey.

The scope should be identified as one of the following types:

- a. **New Construction:** A new construction scope includes the construction of a new structure or structures on vacant land. All Requirements are applicable.
- b. **Adaptive Reuse:** An adaptive reuse scope includes the rehabilitation of an existing building where the use of the building is substantially altered. All Requirements are applicable.
- c. **Substantial Rehabilitation:** Per the IEBC definition of Alteration – Level 3, a substantial rehabilitation scope includes a work area which exceeds 50 percent of the building area. All Requirements are applicable.
- d. **Moderate Rehabilitation:** Per the IEBC definition of Alteration – Level 2, a moderate rehabilitation includes the addition or elimination of any door or window, the reconfiguration or extension of any system, or the installation of any additional equipment, and shall apply where the work area is equal to or less than 50 percent of the building area. All Requirements are applicable.
- e. **Minor Rehabilitation:** Per the IEBC definition of Alteration – Level 1, a minor rehabilitation includes a work area with the removal and replacement or the covering of existing materials, elements, equipment, or fixtures using new materials, elements, equipment, or fixtures that serve the same purpose. All Requirements are applicable except for EGC sustainability requirements.

PRE-DESIGN ACTIVITIES



The scope should be organized around the following major categories:

- a. Site Development
 - Site Hardscape
 - Site Landscape
 - Site Amenities
- b. Building Development
 - Building Structure
 - Building Envelope
 - Building Systems
 - Building Interiors

3. PROJECT ESTIMATE OF PROBABLE CONSTRUCTION COST

As a supplement to the estimate provided by the GC at the time of the Application for Multifamily Financing, IHDA requires applicants to secure an estimate of probable construction cost ("estimate") by an independent third-party consultant. The submitted estimate of probable construction cost shall meet the requirements as identified below and be dated no later than 90 days prior to the application date:

- a. IHDA must be explicitly addressed as being able to rely on the estimate.
- b. An estimate that includes all aspects of the work to successfully complete the full scope of the project based on scope documents supplied by the applicant.
- c. An estimate using recognized construction cost sources such as RS Means Building Construction Cost Data (BCCD).
- d. An estimate that is organized according to the Construction Specifications Institute's (CSI) 16-division or 44-division master format numbering system.
- e. An estimate that incorporates IHDA's requirements for the general contractor's overhead, profit, and general conditions.
- f. If the estimate by the independent third-party consultant differs by 10% or greater from the estimate by the GC, a narrative must be provided to reconcile the two estimates.

4. PROJECT TEAM

4.1 SPECIALTY CONSULTANTS

As part of the Application for Multifamily Financing, IHDA requires applicants to contract with professional services firms including specialty consultants (environmental consultant, surveyor, PNA consultant and cost estimator) and the architect of record. The Authority reserves the right to require other consultants as it may deem appropriate, for the completion of the project. The Authority shall determine if some or all these costs shall be funded by the borrower/developer. The information below is intended as a guide to applicants in the selection of consultants to be used on IHDA funded projects. It is the responsibility of the applicant to decide the capability,

PRE-DESIGN ACTIVITIES



competence and/or limitations of a consultant. IHDA reserves the right to change or waive any of the requirements below and reject any studies.

- a. Professional services firms selected to perform services shall not have any direct or indirect interest in any property to be evaluated. IHDA reserves the right to determine necessary actions to eliminate or neutralize any conflict discovered after an applicant secured a professional firm to provide this service. Failure to disclose any organizational conflict of interest may result in rejection of the application and/or the study by the professional firm with the conflict and request of a study from a different firm at applicant's expense.
- b. The applicant is required to make a proactive effort in selecting and retaining qualified firms certified as Minority Business Enterprise (MBE), Disadvantaged Business Enterprise (DBE) and Women's Business Enterprise (WBE) whenever possible. The applicant is required to verify that any selected MBEs, DBEs and WBEs are registered and have a valid certification number.
- c. The selected consultant must be registered with the Illinois Department of Revenue to conduct business in Illinois and not be debarred, suspended, or otherwise prohibited from professional practice by any Federal, State or Local Agency.
- d. The selected consultant is required to have been in business for a minimum of five (5) years and must demonstrate knowledge and experience related to the development of affordable housing projects.
- e. The selected consultant must supply the applicant with proof of professional liability insurance with a policy limit of \$1,000,000 per occurrence and \$2,000,000 excess umbrella and must submit a copy of the certificate to IHDA. The applicant will determine and notify the applicant of any additional parties, if required prior to contract issuance. Selected firms must not allow their liability insurance to expire or cancel for any reason during the contract period.
- f. Fees for all costs related to the performance of the scope of services shall be determined between the professional services firm and the applicant. The applicant is responsible for payment of fees and entering into a written agreement with the selected professional services firm. Kickbacks or incentives for procuring inflated values will not be permitted.

4.1.1 ENVIRONMENTAL CONSULTANT: The consultant preparing the environmental assessment documentation shall meet the qualifications as outlined in **ASTM Standard E1527**. The **Code of Ethics and Standards of Practice for Environmental Professionals** from the National Association of Environmental Professionals (NAEP) shall apply to all individuals providing environmental services for IHDA projects.

4.1.2 PROPERTY NEEDS ASSESSMENT (PNA) CONSULTANT: The consultant preparing the PNA shall be an independent observer and cannot be connected in any other fashion to the

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project such as the design architect, project architect of record, general contractor, property manager or sponsor. The consultant shall be a professional in the field of architecture or engineering, or appropriate experience and/or certifications in the construction field.

4.1.3 SURVEYOR: The surveyor preparing the survey shall be a registered Illinois land surveyor.

4.1.4 COST ESTIMATOR: The consultant preparing the estimate of probable construction cost shall be an independent observer and cannot be connected in any other fashion to the project such as the design architect, project architect of record, general contractor, property manager or sponsor. The consultant, having a license to conduct business in the State of Illinois, shall be certified by one of the following organizations, as a cost engineer by the Association for the Advancement of Cost Engineering (AACE), as a certified professional estimator by the American Society of Professional Estimators (ASPE), as a certified cost estimator/analyst by the International Cost Estimating and Analysis Association (ICEAA) or having a chartered status issued by the Royal Institution of Chartered Surveyors (RICS).

4.2 ARCHITECT OF RECORD

The Architect of Record (AOR) preparing the construction contract documents and performing construction administration services for the project shall be licensed to perform architectural services in the State of Illinois as either a professional organization or as a sole proprietor and have a history of similar work and type as required for the project.

The Authority shall evaluate the AOR's past performance in addition to the requirements as indicated on the Architect of Record Experience Certification form. The Authority reserves the right to deny a project's funding where a proposed architect does not meet the standards established in this certification, or if the architect's history with the authority does not meet a high-quality standard of design expected to be provided for all projects.

The architect of record will NOT be permitted to act as the general contractor without the written approval of the Authority.

As part of the Application for Multifamily Financing, IHDA requires applicants to contract with an architect of record, using the latest edition of contract form **AIA B101 Standard Form of Agreement Between Owner and Architect** or another version of the AIA Standard Form of Agreement Between Owner and Architect, approved in advance by the Authority.

4.3 GENERAL CONTRACTOR

The General Contractor (GC) providing the required labor and materials necessary for the construction of the project, based on the construction contract documents prepared by the AOR, shall have a history of similar work and type as required for the project.

The Authority shall evaluate the GC's past performance in addition to the requirements as indicated on the General Contractor Experience Certification form. The Authority reserves the right to deny a project's funding where a proposed contractor does not meet the standards established in this certification, or if the contractor's history with the authority does not meet a high-quality standard of construction expected to be provided for all projects.

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As part of the Application for Multifamily Financing, IHDA requires applicants to identify and engage with a proposed general contractor. Prior to Initial Closing, the contract with the GC should be executed using the latest edition of contract form **AIA A102 Standard Form of Agreement Between Owner and Contractor**, the latest edition of contract form **AIA A201 General Conditions of the Contract for Construction** without modifications, and IHDA's rider. The following is a list of requirements to be incorporated into the GC's contract for construction:

- a. **Identity of Interest:** In the event there is an identity of interest between the applicant and GC, the following will apply:
 - The developer fee will be reduced 2%, through the Authority's underwriting process via the Authority's Multifamily Application, or
 - The GC's overhead of 2% shall be eliminated. Limited partnerships, joint ventures, and other types of associations between the applicant and the general contractor shall be subject to the Authority's limitations on overhead.
- b. **Pre-Construction Services** performed by a GC shall be considered as acting as a construction consultant to the applicant. All direct costs and fees associated with this service is viewed as consultancy and therefore is paid through the developer fee.
- c. **Overhead, Profit, and General Conditions:**
 - The combined value of the GC's overhead, profit and general conditions shall not exceed 14%, calculated based on the hard construction costs. This percentage as indicated in the Contractor's Sworn Statement (CSS) at initial closing, shall remain constant throughout the project including any change orders. General conditions, overhead and profit shall be paid out equal to the completion of construction percentage as identified in the pay application. Related mobilization charges shall be evaluated on an as needed basis.
 - As the GC is responsible for general conditions, any subcontracting of these out to lower tier subcontractors will be evaluated against the stated limit and may reduce the amount of the GC's general conditions percentage a GC can collect accordingly. All general conditions items listed in the Appendix must be kept within the allowable percentages and the Authority prefers not to have individual items broken out as separate trade lines on the CSS. If individual items are isolated, the general condition line item must be reduced by the individual line value, so the sum of the general conditions listed, and individual line items do not exceed the allowable limit. Values for these items, if identified by the Authority, are more than the allowable percentage, the individual line-item values shall be removed from the budget. Redistribution of these values through the remaining trades after being removed from the contract is prohibited.
 - The GC shall reduce their markup for any self-performed work. The reduction shall be equal to the 2% of the trade cost identified as being self-performed. All self-performed work anticipated for the project must be identified on the originally submitted CSS for review prior to Initial Closing.

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- Financing, holding charges or other types of construction related interest shall be included in the overhead or general conditions calculation.
- d. **Payment and Performance Bond:** The Authority will require one of the following:
- A payment and performance bond equal to 100% of the cost of construction of the development, or
 - An unconditional, irrevocable commercial letter of credit, issued by a financial institution approved by the Authority, in an amount equal to 25% of the cost of construction of the development.
 - This is not required for projects receiving Low-Income Housing Tax Credit financing only or seeking bond only financing with 4% Tax Credits. Bonding or letter of credit requirements would be at the discretion of other lenders/investors. If a project is seeking additional Authority financing in combination with these sources, the bond or letter of credit must be provided as described above.
- e. **Build America, Buy America (BABA) Act:** For projects subject to the Build America, Buy America (BABA) Act, where IHDA has provided HOME or NHTF resources, the general contractor and all subcontractors must comply with the requirements of the Build America, Buy America (BABA) Act, 41 USC 8301 note, and all applicable rules and notices, as may be amended, if applicable to the general contractor's infrastructure project. Pursuant to HUD's Notice, "Public Interest Phased Implementation Waiver for FY 2022 and 2023 of Build America, Buy America Provisions as Applied to Recipients of HUD Federal Financial Assistance" (88 FR 17001), any funds obligated by HUD on or after the applicable listed effective dates, are subject to BABA requirements, unless excepted by a waiver.

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PRE-DESIGN DELIVERABLES AND REVIEW PROCESS

The following is a list of deliverables required to demonstrate compliance with the requirements of the Pre-Design Activities along with their respective review process:

- a. IHDA Environmental Report Checklist: To be submitted to IHDA at the time of application for review by Regulatory Compliance.
- b. Consultant's Environmental Phase I Report: To be submitted to IHDA at the time of application for review by Regulatory Compliance.
- c. Consultant's Environmental Phase II Report (if required): To be submitted to IHDA at the time of application for review by Regulatory Compliance.
- d. Consultant's Property Needs Assessment: To be submitted to IHDA at the time of application for review by Design Compliance.
- e. Surveyor's Property Survey: To be submitted to IHDA no later than 60 days prior to Initial Closing for review by Design Compliance.
- f. IHDA Project Development Scope Summary: To be submitted to IHDA at the time of application for review by Design Compliance.
- g. Consultant's Project Estimate of Probable Construction Cost: To be submitted to IHDA at the time of application for review by Construction Compliance.
- h. Architect of Record Experience Certification: To be submitted to IHDA at the time of application for review by Design Compliance.
- i. General Contractor Experience Certification: To be submitted to IHDA at the time of application for review by Construction Compliance.

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OVERVIEW

Design activities are focused on obtaining and reviewing design and construction documents to assist IHDA in the evaluation of the project's compliance with design requirements.

The drawings and specifications must be prepared under direct supervision of an Illinois licensed architect in accordance with the Architectural Practice Act, bear the license number of the architect, and if the architect is part of any business structure other than a sole proprietorship, he or she must include the project design firm registration number on the drawings. The drawings are required to be signed and sealed by the architect of record. A professional engineer licensed to practice their profession in the State of Illinois, when acting as a consultant to the architect of record or under a separate agreement with the applicant, must sign and seal his work and provide proof of professional liability insurance.

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

Refer to the Drawing Checklist for additional information as applicable to each project scope.

This chapter is organized as follows:

REQUIREMENTS

1. Accessibility & Visitability
2. Sustainability
3. Site Components
4. Building Components
5. Unique Building Types

DELIVERABLES AND REVIEW PROCESS

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REQUIREMENTS

1. ACCESSIBILITY & VISITABILITY

Projects must comply with the adopted local building and accessibility code. One or more of the following accessibility standards and codes shall be applicable to any development funded by the Authority. When there is a conflict in the design requirements of the various standards and codes, the most stringent requirements will prevail.

- a. **The Americans with Disabilities Act (ADA):** All projects which include common areas open for public use, such as a property management or rental office, community room, kitchen, public toilet rooms, lobbies, and corridors, shall comply with all requirements.
- b. **Federal Fair Housing Act (FFHA) and International Code Council (ICC) / American National Standard (ANSI) A117.1 (2009):** New construction projects of four or more dwelling units and buildings constructed for first occupancy after March 13, 1991, shall comply with all accessibility standards and design requirements.
- c. **Illinois Accessibility Code (IAC), Section 233, Residential Facilities:** Projects with housing units that are owned or financed by a governmental unit that consist of five or more dwelling units on each project site, shall comply with all requirements.
- d. **Uniform Federal Accessibility Standards (UFAS) Section 504 of the 1973 Rehabilitation Act and 1984 Uniform Federal Accessibility Standards:** Projects with housing units that receive federal financial assistance (HOME, National Housing Trust Fund, Risk Share, Section 811, etc.), shall comply with all requirements.
- e. **United States Department of Housing and Urban Development (HUD) Title 24 Code of Federal Regulations (CFT) § 8.23, Alterations of Existing Housing Facilities:** Projects that receive federal financial assistance, shall comply with all requirements.

1.1 NEW CONSTRUCTION REQUIREMENTS

1.1.1 ADAPTABLE UNITS: At a minimum, 20% of the total number of units must comply with the requirements of the IAC Section 233.6.5.

1.1.2 ACCESSIBLE UNITS: At a minimum, 10% of the total number of units (with at least one) shall be Type 'A' accessible units for persons with mobility impairments, in compliance with ICC/ANSI A117.1 (2009). In projects where there is a variety of units offered, at least one of each type of unit, including town houses, must be designed to the Type 'A' unit standard. The development must offer the same choices of unit location and variety of units to persons with mobility impairments as those who are not mobility impaired.

1.1.3 SENSORY UNITS: At a minimum, 2% of the total number of units (with at least one) shall be suitable for units for persons with hearing or visual impairments, in compliance with

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ICC/ANSI A117.1 (2009). The number of hearing and visual impaired units shall not be included in the required unit count for accessible units.

1.1.4 BUILDINGS WITH ELEVATORS: At a minimum, 100% of the total number of units must comply with the requirements of the FFHA.

1.1.5 BUILDINGS WITHOUT ELEVATORS: At a minimum, 100% of the total number of ground floor units must comply with the requirements of the FFHA.

1.2 ADAPTIVE REUSE & REHABILITATION REQUIREMENTS

Unless technically infeasible, adaptive reuse and substantial rehabilitation of existing buildings shall comply with the requirements listed for new construction.

Moderate and minor rehabilitation of existing buildings shall comply with the requirements listed for new construction, to the maximum extent feasible.

The level of accessibility will be determined by complying with IAC, Section 202. For rehabilitation of historic buildings including compliance with requirements of the State of Illinois Historical Agency, IAC, Section 202.5 will govern.

1.3 VISITABILITY

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

If feasible the following should be incorporated in rehabilitation projects as well.

1.3.1 ACCESSIBLE ROUTE: From the point of arrival, defined as the public walk or public parking, to the point of access, defined as the main entrance of each unit, the accessible route should include a clear width of 36", a running slope of not greater than 5%, and a cross slope of not greater than 2%. For single family and townhome units, point of access does not include an attached garage. In the absence of a public point of arrival, consult with Design Compliance on allowable options.

1.3.2 MAIN ENTRANCE: Each unit must have at least one zero-step entrance which is an entrance without a step at the entrance door and with less than 1/2" difference between the inside and outside surfaces, or with a threshold with less than a 1/2" rise. An overhang or porch roof is recommended to protect the entrance from the elements. The main entrance shall be a minimum of 36" wide and all other doors on the main level shall be a minimum of 34" wide.

1.3.3 BATHROOM: Half bathroom on the main entrance floor in compliance with the requirements of UFAS, Section 4.34.5 or requirements of ICC/ANSI A117.1 (2009).

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2. SUSTAINABILITY

Projects must comply with the following standards and codes. When there is a conflict in the design requirements of the various standards and codes, the most stringent requirements will prevail.

- a. **Enterprise Green Communities (EGC):** New construction, adaptive re-use, substantial and moderate rehabilitation project types must comply with the forty mandatory project criteria in the eight major sections of the Enterprise program, as outlined in the Mandatory Criteria Checklist, unless pursuing certification under one of the green building standards as described in the QAP. In addition, new construction, adaptive re-use, substantial and moderate rehabilitation project types must comply with the EGC requirements for blower door testing and submit the test results at the time of construction close-out. If the project is unable to comply with EGC mandatory requirements, a waiver request must be submitted at the time of application for review by Design Compliance.
- b. **Illinois Energy Conservation Code (IECC):** All project types must comply with the prescriptive option, for single family and low-rise residential buildings of 3 stories or less, or the performance option for residential buildings of 4 stories or over.
- c. **Energy Star:** All new appliances shall be Energy Star certified where certification is available for that appliance type. Provide proof of certification as a part of the design review submittal.

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3. SITE COMPONENTS

3.1 HARDSCAPE

3.1.1 ROADWAYS & SIDEWALKS: The design of private internal roadways and sidewalks shall comply with the local jurisdiction's design requirements to enable them to be acceptable to the municipality to qualify for future dedication to the municipality. Parking areas must be paved and graded for proper drainage as set forth in the HUD Minimum Property Standards.

3.1.2 PARKING: Parking spaces shall be provided as per local zoning ordinance but in no case be less than one parking space per dwelling unit for family housing, and 0.75 spaces per unit for senior housing except for the following housing types. Where site constraints prohibit complying with a 1:1 parking ratio, consult Design Compliance.

HOUSING TYPE	EXCEPTIONS
Supportive Living Facilities for the Frail Elderly (as defined by the Illinois Department of Public Aid)	One parking space shall be provided for each 10 units plus one parking space for every two staff members and 10% of the total number of units for visitor parking or as per local ordinance, whichever is greater.
Single Room Occupancy (SRO)	One (1) parking space shall be provided for each 10 units or as per local ordinance, whichever is greater.
Supportive Family Housing	One (1) parking space shall be provided for each 5 units or as per local ordinance, whichever is greater.
Transit Oriented Development	Reduction of parking requirement as allowed by local zoning codes meeting with distance to transit requirements.

Parking areas shall be designed to meet the minimum parking space and drive aisle requirements within the local zoning or building codes. The following minimum dimensions shall be provided if there are no local standards:

- a. Double-loaded 90-degree parking areas shall be a minimum width of 60'-0".
- b. Single-loaded 90-degree parking areas shall have a minimum width of 42'-0".
- c. Intermediate and access aisles shall be a minimum of 24'-0" in width for two-way traffic, and 12'-0" in width for one-way traffic.
- d. A minimum number of accessible parking and accessible van parking stalls shall be provided meeting with local and state accessibility code requirements. When accessible

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parking spaces are provided, one space in every six, or fraction thereof, shall be van accessible.

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

- e. Each accessible parking space must be adjacent to an access aisle as allowed by the Illinois Accessibility Code, applicable federal and local codes, whichever is most restrictive, and all access aisles shall blend to a common level with an accessible route.
- f. In multi-family developments, when covered parking is provided, a minimum of 2% of the covered parking spaces shall be accessible. If garages are provided, the minimum dimensions shall be per applicable code and the door shall be 9'-0" wide. Covered parking shall be defined as either an indoor parking garage or an outside parking lot carport.
- g. Accessible parking spaces and access aisles shall be designed so that cars and vans, when parked, cannot obstruct the required clear width of adjacent accessible routes. They shall not have a slope greater than 2% in all directions.
- h. In single family developments with single car garages, the minimum garage dimension will be 11'-0" wide by 20'-0" deep with an 8'-0" wide door.
- i. Concrete curbs at all access drives and parking lots must be provided. A single-family driveway is not considered a parking lot or an access drive and therefore does not require a curb. However, any parking lot provided at public use spaces in single family developments will require a curb per this requirement. If a site is developed within an existing neighborhood where curbs are not provided for the existing roads, new roadways shall be allowed to meet existing conditions, and shall be built per local municipality requirements.
- j. Access to fire-fighting equipment must be provided in accordance with the requirements of the local authorities.
- k. All sidewalks along the accessible route must be a minimum of 5'-0" in width.
Exception: Service walks and sidewalks accessing a single dwelling unit may be 3'-0" in width.
- l. A minimum 6-foot-wide sidewalk is required when parking spaces abut sidewalks, and the edge of the sidewalk becomes the wheel stop. If pre-cast concrete wheel stops are provided and located a minimum of 30" from the edge of the sidewalk to the centerline of the wheel stop, then a 5'-0" wide sidewalk will be permitted.

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- m. Public sidewalks provided for multi-unit single family developments shall be designed to meet local municipality requirements for public sidewalks for neighborhoods.
- n. Refuse collection stations must be on an accessible route and screened with permanent enclosures. Paved areas adjacent to the collection stations must be designed to provide adequate bearing for heavy garbage trucks.

3.2 LANDSCAPE

Landscaping shall minimally comply with the local jurisdiction's zoning or building code. Natural grass seed or sod shall be applied where there is no hardscaping. Trees, with a minimum 2-1/2" DBH, shall be provided to create shade, and/or a natural environmental barrier. Planting beds shall be provided near all site and building entrances, strategically placed along walkways, sitting areas, gathering zones and open areas to create visual interest. Planting beds cannot be left bare and shall be maintained throughout the loan period.

Arrangements in the beds shall be layered with plants, shrubs and low growing plants to add texture, variegated seasonal color and have enough depth to allow for a mixed arrangement of multiple compatible plant varieties. Where roof top access for tenants is designed, the planting strategies shall be considered to promote low maintenance and mental well-being. All plants shall be native and non-invasive to the project's region. In total, above ground planters, planting beds, and tree beds shall not be less than 20% of the total hardscaping area. Turf grass and community vegetable gardens are excluded from the 20% total area calculation.

3.2.1 STORMWATER DESIGN: Stormwater design for the site shall comply with local jurisdictional requirements, and an approved plan shall be submitted to the Authority with the final plans and specifications prior to the start of construction. All permits must be received by the State of Illinois Environmental Protection Agency prior to closing. If no jurisdictional requirements apply, all stormwater must be managed within the project site and be connected into a clearly identified storm sewer system (dedicated or combined).

Treat or retain on-site the precipitation volume from the 60th percentile precipitation event, as defined by the U.S. Environmental Protection Agency in the Technical Guidance on Implementing the Stormwater Runoff Requirements for Federal Projects under Section 438 of the Energy Independence and Security Act. On sites in which retaining the 60th percentile precipitation event is not feasible due to geotechnical issues (e.g., high groundwater elevations, contamination, underground utilities, underground transportation networks), soil conditions (e.g., clay soils) or the size of the site (e.g., zero lot line), the project must treat or retain the maximum possible up to the 60th percentile precipitation event.

3.2.2 IRRIGATION: Irrigation (manual or automated) shall be provided for the proper maintenance of planted material (e.g., trees, shrubs, sod, seeded areas, etc.) A water efficient irrigation system shall be utilized that includes irrigation zones to respond to weather conditions, timer, and controls to minimize evaporation, and soil moisture sensors. In addition, non-freeze wall hydrants or hose bibs shall be provided minimally 200'-0" apart along the perimeter of a multi-family building and at the front and rear of each scattered site development with 1-4 units.

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3.2.3 VEGETATION: Selection of new trees and plants shall be at least 50 percent native and/or adaptive species, 100 percent appropriate to the site's soils and microclimate and do not include invasive species.

3.3 SITE AMENITIES

3.3.1 BICYCLE STORAGE: If provided, bicycle storage facilities shall be in exterior areas with bicycle racks, and/or in a separate room in the building or in a separate storage building. Exterior bike racks, if used, must be anchored, and have the requisite space for a parked bike which will not reduce the required width of an accessible path or parking stall.

3.3.2 PLAYGROUND: For properties without tenant age restrictions, provide a fully equipped playground or tot lot appropriately sized for the project unless otherwise approved by the Authority. An accessible route to the playground must be provided. The ground surface of the play area shall be stable, firm and slip resistant. Where play components are provided, they shall be ADA Compliant. For properties where a playground meets IHDA's requirements identified below and is located within 1/2 mile of the project site, a playground will not be required.

Play areas for younger children shall be centrally located and surrounded by dwelling units. An accessible route must be provided to the play area. The ground surface of the play area shall be stable, firm, and slip resistant.

Playground shall be designed for ages 2-12, service 25% of the occupancy where a minimum of 33% shall be accessible. Provide details for any decorative fencing, fall area material specified as accessible, and provide a basis of design for accessible play system components.

Vendor proposals shall be coordinated with the plans and submitted with the Plan Review package.

3.3.3 RECREATIONAL FACILITIES: Outdoor recreational facilities shall be on an accessible route. Swimming pools and wading pools must meet the Minimum Sanitary Regulations for the Design and Operation of Swimming Pools and Bathing Beaches by the Department of Public Health, State of Illinois, any local public health department regulations, and the ADA.

4. BUILDING COMPONENTS

4.1 LOCATION

All projects located on the flood plain shall submit proof of flood insurance. Federally funded projects located in the flood plain are subject to the 8-step review process as determined by HUD. Projects shall not be in proximity to environmental hazards. Sites that are divided by a heavily traveled major traffic artery shall be avoided and may not be financed.

4.2 FOUNDATIONS

Foundations are to be designed based on a soils report including a boring log which shall be submitted to the Authority for review. In projects composed of one building exceeding 2000

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square feet, there shall be a minimum of three borings within the building footprint and two borings along sidewalks and roadways. In projects with multiple buildings exceeding 2000 square feet, there shall be a minimum of nine borings within the building footprints and evenly distributed throughout the project or as otherwise directed by the structural engineer. In addition, for both single family and multi-family, on previously developed lots, at a minimum one boring is required within the footprint of each former structure. Borings shall extend to a minimum of 15'-0" below the natural grade. For high-rise buildings at least one boring shall extend down to 100'-0" below the natural grade or hardpan.

4.2.1 WALL AND COLUMN SUPPORT FOOTINGS: Wall and column support footings shall be constructed of cast-in-place concrete. They shall be reinforced to accommodate the design loads. Timber, steel grillage, or other material used for footings will not be permitted. Wall and column footings shall extend to the appropriate frost depth for the site, or bear on suitable soil meeting the specified soil bearing capacity identified by the soils report.

4.2.2 FOUNDATION WALLS: Cast-in-place concrete, precast concrete and masonry foundation walls will be permitted and shall be designed to meet the requirements of the local building code. Steel sheet piles or helical pier foundations shall be allowed, with Authority approval. Wood foundation systems, rubble stone or any other similar materials used for foundation walls will not be permitted.

4.2.3 FOUNDATION DRAINAGE: An under-slab drainage system must be installed when the water table is 5'-0" or less below the bottom of the floor slab to prevent hydrostatic pressure build-up from groundwater fluctuation.

Finished grade at the exterior perimeter of the building shall be not less than 4" below the top of the exterior face of the foundation wall and slope away from the building at a slope of 5% for a minimum of 10'-0" measured perpendicular to the wall.

4.2.4 SPECIAL FOUNDATION CONDITIONS: Beneath concrete slabs, except where existing slabs are left intact for rehabilitation projects, choose one of the following details:

- a. Install a 4" layer of $\frac{3}{8}$ " diameter or greater clean aggregate as a capillary break.
- b. Install a 4" uniform layer of sand, overlain with a layer of or strips of geotextile drainage matting installed according to the manufacturer's instructions.

Beneath crawl spaces without slabs (projects on raised pier foundations with no foundation walls are exempt), choose one of the following details:

- a. Install at least 8-mil cross-laminated polyethylene on the crawl space floor, extend up at least 12" on piers and foundation walls with joints overlapping at least 12". The 8-mil and the cross-lamination ensure longevity of the polyethylene.
- b. Line the anticipated high-traffic area(s) of the crawl space with foam board, so the polyethylene beneath will not be disturbed.

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4.2.5 RADON SYSTEMS: All projects must comply with the Illinois Emergency Management Agency Radon program and the EPA's radon guidelines. When radon mitigation is either recommended or required, at a minimum, a passive-active system shall be installed.

4.3 EXTERIOR ENVELOPE

Provide water drainage away from walls, windows, and roofs by implementing the following techniques. Provide a continuous housewrap /weather-resistive barrier with sheets lapped, shingle-style to prevent bulk water that penetrates the finished exterior cladding system from entering the wall assembly or being introduced through window or door openings or through other penetrations. Alternatively, install a fluid applied weather-resistive barrier in accordance with manufacturer's instructions. Taped systems (such as ZIP, ForceField, and others) are acceptable.

Precast panel systems shall be designed and engineered by an Illinois licensed design firm with a minimum of 5 years' experience. All system aspects shall be fully coordinated with the Architect of Record. Stamped drawings, incorporating all applicable items listed on the IHDA Drawing Checklist, are required for plan review.

4.3.1 FLASHING: Flashings at roof/wall intersections and wall penetrations (i.e., plumbing, electrical, vents, HVAC refrigerant lines and the like in addition to windows and doors) must be integrated with the weather-resistive barrier and drainage plane prior to any exterior finish being installed to prevent bulk water from entering the exterior wall assembly. This includes kick-out flashing where a sloped roof eave terminates in a wall with siding, stucco, or other applied finish apart from brick veneer. Flashing must be installed at the bottom of exterior walls with weep holes included for masonry veneer and weep screed for stucco cladding systems or equivalent drainage systems.

4.3.2 WALL CLADDING: Exterior wall facings shall consist of 4" face brick, stone, concrete masonry units, aluminum siding, vinyl siding, metal lath and cement stucco, glass and aluminum curtain wall systems, prefinished metal panels, cementitious siding, treated engineered wood siding, insulated precast concrete decorative panels, wood siding or Authority approved equal.

Exterior Insulation and Finish Systems (EIFS) are permitted in limited areas as an exterior facing with the approval of the Authority only and shall not be allowed as a primary building facing. EIFS shall not be allowed as a finish material to be placed over the face of exterior cladding on existing buildings.

4.3.3 MASONRY RESTORATION: Special attention shall be given to a review of the lintels and mortar joints when rehabilitating masonry structures. A detailed repair scheme must be incorporated in the plans and specifications including the clearly defined areas where lintel repair and tuckpointing work is to be performed. All steel lintels shall be galvanized and repaired if scraped during installation. All exposed surfaces of steel lintels shall be finished to match adjacent finish.

4.3.4 OPENINGS: All new windows shall have insect screens.

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4.4 SYSTEMS

Design-build type systems shall be designed and engineered by an Illinois licensed design firm with a minimum of 5 years' experience. All system aspects shall be fully coordinated with the Architect of Record. Stamped drawings, incorporating all applicable items listed on the IHDA Drawing Checklist, are required for plan review.

4.4.1 HEATING, COOLING AND VENTILATION (HVAC): All units shall be heated and air-conditioned. The design of the system shall be such to maintain a consistent temperature in all habitable spaces evenly throughout the day. Heating, ventilating, and air-conditioning systems shall be designed and installed according to the requirements of the local building code. If no building code is adopted within the jurisdiction, the most current edition of the International Mechanical Code shall apply. They shall also comply with the efficient utilization of energy in accordance with the latest edition of the International Energy Conservation Code with Illinois Amendments. Lastly, the United States Department of Energy REScheck or COMcheck compliance verification and code requirements must be submitted to the Authority for review. All HVAC, plumbing, fire protection and electrical floor and wall penetrations must be properly sealed to maintain both the proper fire rating as required by the applicable building code, and/or acoustic control of adjacent spaces.

Size and select heating and cooling equipment in accordance with the Air Conditioning Contractors of America (ACCA) Manuals J and S or in accordance with the most recent ASHRAE Handbook of Fundamentals available at time of specification.

The installation and approval of fuel gas distribution piping and equipment, fuel gas-fired appliances, and fuel gas-fired venting systems shall be in accordance with the latest edition of the International Fuel Gas Code or the local building code, whichever is most stringent.

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

A local mechanical exhaust system, in full accordance with ASHRAE 62.2-2010, shall be installed in each bathroom and kitchen. For Historic projects, consult Appendix A of ASHRAE 62.2-2010 on options for compliance.

Buildings of four stories or more, in full accordance with ASHRAE 62.1-2010, shall also install a mechanical ventilation system for all hallways and common spaces.

New technologies (items such as: alternative building systems, new design components and/or materials, etc.) included for the purpose of decreasing operating costs must be proven and not experimental. Any new technology incorporated for energy savings will need to be justified through a cost benefit analysis. Applicable new technologies shall include any proposed efficiencies in excess of those indicated in the 2018 International Energy Conservation Code, ASHRE Standard 90.1-2019, or beyond those typically employed in similar housing. New technologies shall have a payback period within 15 years. Simple payback analysis shall at a minimum be utilized, or: the initial cost of the technology (or differential cost over its equivalent) divided by the annual energy savings due to the new technology. The payback period shall be

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calculated using the current Authority underwriting forecasting assumptions and shall incorporate maintenance costs, adjustments for any needed life cycle repairs and/or reserves.

4.4.2 PLUMBING: The Illinois State Plumbing Code, the local plumbing code, and these standards shall govern all plumbing work performed on new construction and the rehabilitation of existing buildings. Whenever there is a conflict in the requirements between the regulations, the more stringent requirement will prevail. All plumbing work shall be performed only by Illinois licensed plumbers and apprentice plumbers under the direction of a licensed plumber.

- a. No project shall be served by a well or septic system.
- b. On rehabilitation projects, replacement of the lead pipe incoming water service shall be required.

All equipment used for heating water or storing hot water shall be provided, at the time of installation of such equipment, with an appropriate relief valve or valves to protect against excessive or unsafe temperature and/or pressure. Water distribution piping from the water meter throughout the building shall be "Types K or M" or ductile iron for below ground piping, and copper or PEX for above ground piping. CPVC or Polybutylene water distribution pipe shall not be permitted. PEX piping below grade shall be allowed to be installed following industry best practices and code requirements.

Dielectric isolation shall be provided between ferrous and non-ferrous metals. Provide dielectric unions at points of connection of copper piping to ferrous piping and equipment or fittings.

Indicate on the drawings that water-conserving fixtures with the following minimum specifications will be used:

FIXTURE	WATER CONSERVATION MINIMUMS
Toilets	1.28 GPF with MaP Score >800
Urinals	0.50 GPF
Showerheads	1.75 GPM
Kitchen faucets	1.50 GPM
Bathroom faucets (public use)	0.50 GPM
Bathroom faucets (private use)	1.50 GPM

4.4.3 ELECTRICAL: The National Electrical Code, the local electrical code, and these standards shall govern all electrical work performed on new construction and the rehabilitation of existing buildings. Whenever there is a conflict in the requirements between the regulations, the more stringent requirement shall prevail.

The electric service to each dwelling unit shall be metered separately in all new construction projects. One central meter shall only be permitted with a letter of approval from the electric utility company.

- a. The minimum electric service to a dwelling unit shall be 60-amperes. Appropriately sized and rated, existing electrical service may be allowed to remain for apartment unit rehabilitations. A load calculation for each unit of the proposed design should be

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provided to ascertain if the service is properly sized for the project.

- b. Copper wiring is required in all branch circuits and within all units. Aluminum and aluminum clad copper wiring is ONLY allowed in feeders 60 amps or larger terminating in disconnects and electrical panels with lugs that are rated and suitable for aluminum wiring. The line from the transformer to the meter is regulated by the National Electrical Code and/or the local utility company whichever is most stringent.
- c. In existing buildings that have existing aluminum wiring, all switches and outlets rated 20-ampere or less directly connected to aluminum conductors must be marked CO/ALR.
- d. Every dwelling unit in buildings serviced by natural gas shall be equipped with at least one approved carbon monoxide (CO) alarm meeting the installation and operational requirements of the Carbon Monoxide Alarm Detector Act (Public Act 094-0741) and the local municipal requirements, whichever is more restrictive. All CO alarms shall be hard wired in new construction projects with appropriate battery back-up. Rehabilitation projects may utilize battery powered or plug in CO detectors if allowed by the local AHJ.
- e. Every dwelling unit shall be equipped with at least one approved smoke detector in accordance with the location and operation requirements of the Smoke Detector Act (Public Act 425 ILCS 60/) and local code requirements, whichever is more restrictive.
- f. Exposed conduit is prohibited unless concealment of the conduit is not physically possible or is considered integral to the design intent. Contact the Authority in the design stage for prior approval. If approved, the conduit or wire mold must be painted to match the mounting surface.
- g. Family projects shall have tamperproof receptacles in all rooms except for utility rooms and garage. In rehabilitation projects receptacles shall be replaced where technically feasible.

4.4.4 LIGHTING: Exterior lighting shall be provided by LED fixtures which meet energy code requirements for lighting power densities and efficiencies. The lighting design shall minimize light trespass and glare from selected fixtures both off properties and into residential units.

Interior lighting shall be provided by LED fixtures which meet energy code requirements for lighting power densities and efficiencies. The lighting design shall meet the Illuminating Engineering Society's (IES) recommended foot-candle levels.

4.4.5 FIRE PROTECTION: Fire protection systems, if required by code, must be properly priced to include all equipment and accessories required for a fully operational system for the building. This value shall be represented on the CSS submitted for review prior to Initial Closing of the project.

- a. The price of the system included in the CSS must meet all applicable code requirements. Change orders requiring additional expenses related to the fire protection

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system, if as a result of code compliance after Initial Closing, will be classified as errors and omissions.

- b. Exposed piping of fire protection systems is prohibited unless concealment is not physically possible. Contact the Authority in the design stage for prior approval. If approved, the pipe must be painted to match the mounting surface.

4.4.5 SECURITY: Security components to include the following: camera system, alarm systems, and access control systems.

4.4.6 COMMUNICATION: Common areas and units to include access to high-speed internet either through wireless service or a hard-wired connection.

4.5 INTERIORS

4.5.1 FLOORING: All flooring products (whether carpet or hard surface) must comply with the emission requirements identified in EGC 6.4 Healthier Material Selection. No flexible PVC with phthalates may be installed, whether the phthalates were intentionally added or added via recycled content. Carpet shall not be permitted as a floor finish in building entryways, laundry areas, kitchens/kitchenettes, bathrooms, or utility rooms. Fluid applied finish floors may only be installed in non-occupied spaces, such as mechanical rooms.

4.5.2 INTERIOR PAINTS, COATINGS, PRIMERS, AND WALLPAPERS: These material selections must have VOC content less than or equal to the thresholds provided by the most recent version of SCAQMD 1113 available at time of product specification for all interior paints, coatings, and primers. All wallpaper must be phthalate free.

4.5.3 INTERIOR ADHESIVES AND SEALANTS: These material selections must have VOC content less than or equal to the thresholds provided by the most recent version of SCAQMD 1168 available at time of product specification for all interior adhesives and sealants.

4.5.4 INSULATION: Fiberglass or mineral wool batt insulations must be formaldehyde-free.

4.5.5 COMPOSITE WOOD: Formaldehyde emissions less than or equal to the thresholds provided by CARB Phase 2 and/or TSCA Title IV for plywood, particleboard, MDF, and these materials within other products like cabinets and doors. For any other composite wood products not covered by CARB/TSCA requirements, but used in interior spaces, these must at minimum have No Added Urea Formaldehyde (NAUF).

4.5.6 STAIRS: Open risers are not permitted. Outdoor stairs and their approaches shall be designed so that water will not accumulate on walking surfaces. Exterior fire escapes shall not be permitted in new construction projects but will be acceptable as a means of egress component in existing buildings only.

When stairs are installed along routes that are required to be accessible there must be an alternative way to get between levels. When an accessible route consists of both a ramp and stairs, it is recommended they are in close proximity so people who can use only one of the two need not travel an unreasonable additional distance.

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If the alternative option chosen is elevator or lift, the stairs do not need to comply with the "Stairways" section outlined in ICC/ANSI A117.1 (2009) adopted by the authority having jurisdiction.

If the alternative option chosen is a ramp, the stairs must comply with the "Ramps" section outlined in ICC/ANSI A117.1 (2009) adopted by the authority having jurisdiction.

4.5.7 WINDOW TREATMENTS: All windows shall be provided with window treatments that, when closed, limit views and control the amount of light entering the room.

4.6 COMMUNITY FACILITIES

4.6.1 COMMUNITY ROOM: Provide a kitchen that at a minimum has a sink, cooktop-oven, refrigerator, base, and overhead storage. In municipalities requiring a commercial range hood above a range, the cooktop-oven may be omitted, but a letter confirming this requirement as part of the municipal code must be provided to the Authority for review. The cooktop-oven appliance requirement can be substituted with a microwave-oven appliance incorporating GE Advantium Technology or equivalent.

4.6.2 LAUNDRY ROOM: Provide a common laundry room with washers and dryers equal to the more stringent number required by the most current edition of the local or state plumbing code. 5% of the total number, or a minimum of one each, of washers and dryers must be front loading. When a common laundry room is not provided, washers and dryers must be provided within each dwelling unit. Utility hook-ups alone are not sufficient. In accessible dwelling units, a front-loading washer and dryer must be provided.

4.6.3 RECREATIONAL FACILITIES: Indoor recreational facilities shall be located within the project, and shall comply with the following minimum size requirements.

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

4.6.4 SUPPORT SPACES:

- a. Support spaces include the management office and maintenance spaces. If office space is contemplated, it must be for the exclusive use for tenant services or for the operation of the building. The applicant shall discuss the plans with the Authority's staff at the earliest opportunity. If the size of the project warrants a separate common space for the management staff and rental office, it shall include an office large enough to accommodate a secretarial space, a waiting/reception area, at least one accessible public restroom, and a storage/coat closet. These areas must be located on an accessible route from the point of arrival and accessible to persons with disabilities. These areas may be in separate buildings, such as a clubhouse, or on the ground floor.

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to allow for maximum site and building surveillance. When a separate workroom or repair shop having vehicular access is provided, it shall be appropriately sized and include storage facilities, a utility sink, toilet facilities, and work bench.

- b. Refuse collection and compactor rooms shall be mechanically ventilated and be in a room completely separated from the remainder of the building with walls and ceiling meeting code defined fire separation requirements. Where the room is serviced by a trash chute, code required, and maintenance sprinkler heads shall be provided. All openings to trash rooms shall meet code requirements in terms of fire rating and hardware. A concrete slab shall directly link access from this area to the exterior pick up point. Floor drains and hose bibs shall be provided at these trash termination locations. Refuse and laundry chutes shall not be used for any other purpose. The chutes shall have a fire resistive rating of not less than what is required by the applicable building code. An automatic sprinkler system shall be installed as required by code. Chutes extending three or more floors shall have additional sprinkler heads installed within the chute on alternate floors and be accessible for servicing. Trash chute access doors shall have lever operating device and closers if not automatically actuated.

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4.7 UNITS

4.7.1 UNIT SIZES: The following table indicates the Authority's minimum acceptable dwelling unit size:

DWELLING TYPE	AREA (INSIDE DIMENSIONS)
Single Room Occupancy (SRO) – 1 occupant	250 SF
Single Room Occupancy (SRO) – 2 occupants	400 SF
Efficiency	300 SF
Supportive Living – 1 occupant	300 SF
Supportive Living – 2 occupants	450 SF
1 Bedroom and 1 Bathroom	525 SF
2 Bedrooms and 1 ½ Bathrooms	750 SF
3 Bedrooms and 1 ¾ Bathrooms	950 SF
4 Bedrooms and 2 Bathrooms	1,100 SF
For rehabilitation type projects, the existing dwelling unit size will be allowable	

All SROs shall include both a private bathroom with sink, toilet and bathing facilities, and a kitchen within the unit.

Unit living rooms (excluding SRO, efficiency, and supportive living units, or combined living areas) shall contain a minimum of 150 square feet and have a minimum dimension of 10'-0" in any horizontal dimension. Units' bedrooms (excluding SRO, and efficiency) shall contain a minimum of 100 square feet, not including closets, and have a minimum dimension of 9'-0" in any horizontal dimension. Clearly provide overall dimensions on enlarged plans.

4.7.2 UNIT STORAGE: All projects must include bulk storage areas within closets in the apartment unit or in a common tenant storage room. If provided within a closet, the provided volume must be free and clear from the floor to the ceiling without any fixed shelving. Adjustable shelving is allowed. The total volume provided within all bulk storage areas shall be as follows:

DWELLING TYPE	VOLUME
SRO/Efficiency	32 cubic feet
1-bedroom unit	72 cubic feet
2-bedroom unit	128 cubic feet
3-bedroom unit	200 cubic feet
4-bedroom unit	288 cubic feet

The minimum ceiling height in all habitable rooms shall be 7'-6". Soffits may be dropped to 7'-0" if soffit area does not exceed 20% of room area.

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4.7.3 UNIT BATHROOMS: If prefabricated shower and/or bathtub units are specified and provided with factory installed integral reinforcing, cast into the unit for installation of grab bars at code compliant locations of the unit walls.

- a. When prefabricated units are installed in multi-unit apartments, they must have a single layer of water-resistant wall sheathing installed prior to the unit being placed behind the unit, along with a cover layer of sheathing installed over the unit wall flange.
- b. The installation of grab bars at all water closets, bathtubs and shower units complying with ICC/ANSI A117.1 (2009 or latest version adopted by the authority having jurisdiction) shall be required for fully accessible units or in buildings dedicated to seniors or people with disabilities.

4.7.4 UNIT KITCHENS: Allowable clear space above range/stove to combustible surfaces shall be 21 inches minimum and coordinated with location of accessibility features.

4.8 COMMERCIAL TENANT SPACE

When commercial tenant space is provided in new construction, adaptive re-use, and substantial rehabilitation project types, shafts for routing potential future ductwork, and piping that are required for exhaust must be included to allow for the exhaust to be expelled above the roof line.

5. UNIQUE BUILDING TYPES

5.1 SUPPORTIVE LIVING FACILITIES

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

All SLF developments must be approved by the State of Illinois Department of Healthcare and Family Services (DHFS). Written approval from DHFS must be provided to the Authority at the time the application is submitted. The SLF's architectural plans shall conform to Title 89, Social Services, Chapter 1: Department of Healthcare and Family Services, Subchapter d: Medical Programs, Part 146.210 Structural Requirements. An SLF's architectural plans shall conform to the current state building codes for the respective building type, local fire and life safety standards for health care occupancy or the 2000 National Fire Protection Association Life Safety Code (NFPA) 101, Chapter 32, Residential Board and Care Occupancies, (March 11, 2003, no later amendments or editions included) or local building codes if more stringent.

Each SLF shall meet accessibility standards as related to the Americans with Disabilities Act of 1990, the Illinois Accessibility Code, Section 504 of the Rehabilitation Act of 1973 (if applicable), and the Fair Housing Act and the local building code.

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5.2 FACTORY-BUILT HOMES

This section refers to both pre-manufactured and modular housing. The proposed manufacturer must have at least five years of experience in manufacturing similar housing units. In addition, the installer/general contractor must have prior experience in setting and finishing factory-built housing. Factory-built housing units for multi-family applications will only be allowed for up to one-story in height unless approved by the Authority prior to having the design coordinated by the fabricator. Please contact the Authority design staff for review of potential fabricators prior to commencing work. Factory-built housing units for single-family, detached units will be allowed for up to two stories in height. The design, construction and installation of the factory-built housing units must incorporate all applicable wind, live, dead, snow and seismic design loads including geotechnical characteristics based on the specific geographical site conditions. As applicable, all factory-built housing must comply with the requirements of Title 24, Part 3280 Manufactured Home Construction and Safety Standards, United States Department of Housing and Urban Development. Factory-built housing must also comply with the Illinois Department of Public Health requirements including Approved Manufacturers, Regulations for Factory Built Structures in Illinois, and Guidelines for Installing Manufactured Homes in Illinois which is only intended to be used for installations where the manufacturer's installation instructions are not available.

The Authority's requirements include the following:

- a. The minimum ceiling height in all habitable rooms shall be 7'-6" high. All exterior doors shall have a 32" clear width measured from the face of the door to the opposing stop when the door is open at 90 degrees and a minimum height of 80". All interior doors shall have a nominal 32" clear width measured from the face of the door to the opposing stop when the door is open at 90 degrees and a minimum height of 80".
- b. Living rooms shall contain a minimum of 150 square feet and a minimum dimension of 10'-0" in any horizontal dimension. All other habitable rooms shall have a minimum size of 100 square feet (not including closets) and a minimum dimension of 9'-0" in any horizontal dimension.
- c. Hallways shall have a minimum horizontal dimension of 36" measured from the interior finished surface to the interior finished surface of the opposite wall. If the hallway is restricted by a continuous apparatus, installed or future application, such as a handrail, the measurement shall be from the face of the apparatus.
- d. Carbon monoxide detectors shall comply with the State of Illinois Carbon Monoxide Detector Act and shall be hardwired. Smoke detectors shall be hardwired with battery back-up.
- e. Water distribution piping from the water meter throughout the building shall be Type K for below ground piping, and Types L or M copper or PEX for above ground piping. CPVC and Polybutylene water distribution pipe shall not be permitted. PEX piping shall be allowed to be installed below floor slabs as allowed by code and industry best practices.

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All plumbing shall comply with the State of Illinois Plumbing Code and the HUD regulations. If there is a conflict, the more stringent requirement will prevail.

- f. All manufactured housing must comply with the energy conservation requirements of the International Energy Conservation Code, latest edition, and the energy conservation measures outlined in these standards.
- g. Copper wiring is required in all branch circuits and within all units. Aluminum and aluminum-clad copper wiring is ONLY allowed in feeders 60 amps or larger terminating in disconnects and electrical panels with lugs that are rated and suitable for aluminum wiring. The line from the transformer to the meter is regulated by the National Electrical Code and/or the local utility company, whichever is most stringent. The minimum electric service to the dwelling unit shall be 60-amperes.

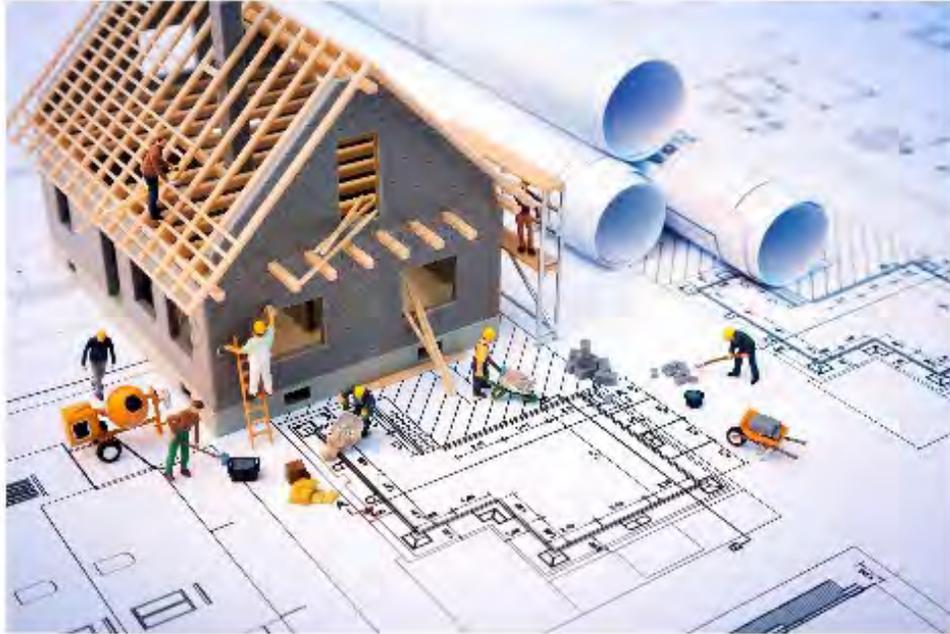
DESIGN ACTIVITIES



DESIGN DELIVERABLES AND REVIEW PROCESS

The following is a list of deliverables required to demonstrate compliance with the requirements of the Design Activities along with their respective review process. The completed Drawing Checklist Form shall accompany all submissions for review.

- a. **Project Drawings & Specifications – Preliminary Optional Review:** To be submitted to IHDA no earlier than the completion of the Schematic Design Phase for review by Design Compliance.
- b. **Project Drawings & Specifications – Final Required Review:** To be submitted to IHDA no later than 60 days prior to Initial Closing for review by Design Compliance.
- c. **Construction Contract:** To be submitted to IHDA no later than 30 days prior to Initial Closing for review by Construction Compliance.
- d. **Project Drawings & Specifications – Issue for Construction:** To be submitted to IHDA prior to the start of construction for review by Design Compliance. The Issue for Construction documents shall incorporate all changes requested by IHDA and other governmental agencies and agreed to by the AOR. The documents shall be sealed and signed.



CONSTRUCTION ACTIVITIES

CONSTRUCTION ACTIVITIES



OVERVIEW

Construction activities are focused on monitoring the progress of construction to assist IHDA in the evaluation of the project's compliance with construction requirements.

The Authority's assigned Coordinator of Construction Compliance will work with the development team to review required documents and monitor the progress of construction to ensure the implementation of the scope of construction work is in compliance with the general contractor's construction contract.

This chapter is organized as follows:

REQUIREMENTS

1. Pre-Construction
2. Construction
3. Construction Close-Out

DELIVERABLES AND REVIEW PROCESS

CONSTRUCTION ACTIVITIES



REQUIREMENTS

1. PRE-CONSTRUCTION

The Authority will convene a meeting prior to the start of construction, attended by representatives of the applicant, architect of record, and the GC.

2. CONSTRUCTION

2.1 PAYMENT PROCEDURES

2.1.1 MONTHLY PAY REQUESTS: With IHDA's Construction Compliance Coordinator, the applicant, architect of record and the contractor shall schedule monthly pay request meetings to review construction progress and verify accuracy of the contractor's Application for Payment. The following documents will be required 5 days prior to the scheduled meeting to review and process payment:

- a. AIA G702 and AIA G703: Contractor's Application for Payment and Continuation Sheet.
- b. Contractor's Sworn Statement: In a format acceptable to The Authority.
- c. Subcontractor G702s and G703s; or other adequate supporting documentation.
- d. Other backup deemed necessary to substantiate the request.

2.1.2 STORED MATERIALS: The value of reimbursements for stored materials shall not exceed 60% of the total contract value for the associated line on the Contractor's Sworn Statement. The timeframe between payment of stored materials and installation of stored materials shall not exceed 120 calendar days without prior approval from the Authority. The stored materials must be under the control of the general contractor or subcontractor, not the manufacturer or fabricator, and located either offsite in an independent facility or onsite in an area isolated from construction activities. The following documents will be required to review and process the reimbursement:

- a. **Proof of Approval:** Architect's approved shop submittals, if applicable.
- b. **Proof of Payment:** Manufacturer or fabricator's approved invoice. Proof of payment, clearly indicating payee, must be submitted on the subsequent construction draw. If proof of payment is not submitted on the subsequent construction draw, IHDA reserves the right to deduct an amount equal to the approved invoice, on the construction draw.
- c. **Proof of Delivery:** Manufacturer or fabricator's bill of lading, identifying shipping insurance, liability information and the approved destination for materials to be delivered to.

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- d. **Proof of Storage:** IHDA Stored Materials Log and photo documentation to provide evidence of stored materials.
- e. **Proof of Insurance:** Insurance rider denoting actual materials being stored, with IHDA and other funders of the project being named as insured.

2.1.3 DEPOSITS ON MATERIALS: The value of reimbursements for deposits on materials, including FF&E as defined in the Appendix, shall not exceed 50% of the total value of the costs. Failure to deliver the materials as scheduled will void the agreement to fund deposits on materials and a hold will be placed on the subsequent Developer Fee installments, equal to IHDA's portion of the deposit on materials:

- a. **Proof of Cost:** Total value of material costs for the project, identifying the value of the deposits, broken out per IHDA's portion and the developer's portion.
- b. **Proof of Payment:** Vendor's approved invoice and proof of payment, clearly indicating payee.
- c. **Proof of Schedule:** A schedule which identifies the following: order date(s), delivery date(s) and installation date(s).

2.1.4 RETAINAGE: A 10% retention must be retained up to 50% completion, upon which it may be reduced to 5% with the approval of the Authority's Construction Compliance Coordinator:

Retention shall apply to all trade labor and material costs, general conditions, overhead and profit and all COs, but does not apply to builder's risk insurance, bonds, and permits.

For single family and scattered site projects only, the Authority will consider retention reduction based upon individual site completion as identified on an individual contractor's sworn statement for each individual site.

2.2 WAGE COMPLIANCE

2.2.1 ILLINOIS PREVAILING WAGE: The Illinois Housing Development Authority (the Authority) administers funds from state sources for housing development activities. The Authority and the recipients of these funds must ensure that all applicable Illinois Prevailing Wage requirements are followed as identified in 820 ILCS 130 – Prevailing Wage Act. The Illinois Department of Labor, not IHDA, monitors for compliance with Illinois Prevailing Wage. For projects with federal sources that require compliance with Davis Bacon, compliance with Illinois Prevailing Wage is not required.

2.2.2 SECTION 3: The Illinois Housing Development Authority (the Authority) administers funds from federal sources for housing development activities. The Authority and the recipients of these funds must ensure that all applicable Section 3 requirements are followed.

The purpose of Section 3 of the Housing and Urban Development Act of 1968, 24 CFR 75 recognizes that employment, job training and contract opportunities are generated by U.S. Department of Housing and Urban Development (HUD) programs designed to aid housing

CONSTRUCTION ACTIVITIES



urban planning, and community development. Section 3 is a mandate to target these economic opportunities flowing from the HUD assisted projects to lower income residents and businesses in those jurisdictions and areas where HUD is investing public resources. Through HUD regulations, participants in HUD's assistance programs (recipients, contractors, and subcontractors) must demonstrate good faith efforts to meet regulatory requirements and to provide "to the greatest extent feasible" opportunities to Section 3 area residents and Section 3 business concerns.

Essentially Section 3 is intended to ensure that when employment or contracting opportunities are generated in a covered activity which requires the employment of additional persons or the awarding of contract for work, preference must be given to low and very-low-income persons or business concerns residing in the community where the Section 3 project is located.

A recipient that receives community development or housing assistance covered by Section 3 for which the amount of assistance exceeds \$200,000. Section 3 requirements apply to all contractors and subcontractors performing labor on federally funded projects.

Section 3 covered federal funding sources include HOME Investment Partnership (HOME), Risk Share (HUD insured), National Housing Trust Fund, Neighborhood Stabilization Program (NSP) which is funded through the Community Development Block Grant (CDBG) and included in the Housing and Community Development Act of 1974 as amended (HCDA).

Section 3 Covered Project: the construction, reconstruction, conversion, or rehabilitation of housing (including reduction and abatement of lead-based paint hazards), other public construction which includes buildings or improvements (regardless of ownership) assisted with housing or community development assistance.

Section 3 Business Concern: a business concern, as defined in this section— Businesses that meet one of the following criteria (documented in the last 6 months):

- a. At least 51% owned and controlled by low-income or very low-income persons.
- b. Over 75% of labor hours performed for the business over prior 3-month period are performed by Section 3 Workers (low or very low-income persons).
- c. At least 51% owned and controlled by current residents of public housing or Section 8 assisted housing.

Section 3 Worker: any worker who currently fits or when hired within the past five years fit at least one of the following categories, as documented:

- a. The worker's income for the previous or annualized calendar year is below the income limit established by HUD.
- b. The worker is employed by a Section 3 business concern.
- c. The worker is a YouthBuild participant.

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Targeted Section 3 Worker: The proposed priorities are

- a. Employed by a Section 3 business concern, or currently meets or when hired, met at least one of the following categories as documented within the past five years;
- b. Living within the service area of the neighborhood of the project; or
- c. Is a YouthBuild participant.

Targeted Section 3 workers would be low or very low-income workers residing within a one-mile radius of the Section 3 project. If fewer than 5,000 people live within that one-mile radius, the circle may be expanded outward until that population is reached.

Section 3 Benchmarks

- a. 25% of total labor hours worked by Section 3 workers.
- b. 5% of total labor hours worked by "Targeted Section 3 workers."

Reporting Labor Hours: Track and report on labor hours rather than new hires, promote employee retention, consistent with existing business practices (i.e., Davis-Bacon and payroll systems).

- a. The total number of labor hours worked.
- b. The total number of labor hours worked by Section 3 workers.
- c. The total number of labor hours worked by Targeted Section 3 workers.

2.2.3 DAVIS BACON: The Authority administers funds from federal sources for housing development activities. The Authority and the recipients of these funds must ensure that all applicable requirements are followed.

The Davis-Bacon Act and Related Acts (DBRA) requires the payment of prevailing wage rates to all laborers and mechanics on federally assisted construction contracts. These regulations can be found in part from the Code of Federal Regulations (Title 29 CFR, parts 1,3,5,6 and 7) as amended. Overall program responsibilities are administered by the U.S. Department of Labor (USDOL) while the project-specific responsibilities are administered by the Authority.

The USDOL provides employers, workers, and others with clear and easy-to-access information and assistance on how to comply with the Davis-Bacon and Related Acts, such as the DBRA Forms page. Other compliance assistance related to the Act, including the Davis-Bacon and Related Acts Web Page and regulatory and interpretive materials is available at the USDOL Compliance Assistance web page.

The Davis-Bacon Act requires that all contractors and subcontractors performing on federal contracts (and contractors or subcontractors performing on federally assisted contracts under the related acts) with a value of more than \$2,000, pay their laborers and mechanics not less than the prevailing wage rates and fringe benefits listed in the contract's Davis-Bacon Wage Rate Determination for corresponding classes of laborers and mechanics employed on similar

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projects in the area. Davis-Bacon labor standards clauses must be included in covered contracts.

Prevailing wages are computed by the USDOL and are issued in the form of a Federal Wage Determination. This determination includes a Wage Rate Determination for each work classification listed by construction type, for each county where work is performed. Each contractor and subcontractor must sign a contract which includes the Federal Wage Determination for its employees by worker classification.

The applicant, GC, and the entity responsible for the labor standards submission to the Authority should first obtain a copy of the current version of HUD's *Making Davis-Bacon Work, A Contractor's Guide to Prevailing Wage Requirements for Federally-Assisted Construction Projects* (The Guide). The Guide will address the various aspects of the process, the required documentation, and relevant items, such as Laws, Regulations and Responsibilities, Compliance, Certified Payroll Submission, Corrections to Payroll, and Withholdings and Sanctions.

Once familiar with the Guide, the GC should determine what subcontractors will be utilized and submit the Guide to those responsible for their implementation. The GC will be responsible for the full compliance of all its employees, subcontractors, and lower-tier subcontractors; subsequently the Authority will correspond directly with the GC.

During the Pre-Construction meeting, the Authority will review the DBRA procedures, requirements, the Wage Determination for the project and other forms for compliance.

The GC shall notify the Authority when construction starts on the project. Beginning with the first week that the GC or subcontractor works on the project and for every week until the work (or trade) has been completed, each covered contractor and subcontractor must provide the Authority with a completed Labor Relations Agreement and certified payroll submitted through the GC. The "certification" part of the payroll contains specific language attesting to the employer's compliance with the wage requirements and signed by the employer or their authorized agent. Submission to and acceptance of appropriate certified weekly payrolls by IHDA must be done prior to any payments to the GC.

IHDA's overall objective is that the project complies with the relevant DBRA provisions. As such, the Authority will strive to provide guidance throughout the process. The applicant should contact the Authority in the early development stage to determine the applicable labor standard requirements and to convey this information to the GC prior to the contractor's estimate and sworn statement.

The Authority's oversight will include:

- a. Ensure Davis-Bacon requirements are properly applied. The Authority will determine when Davis-Bacon prevailing wage rates are applied and that any exemptions or exceptions are identified.
- b. Provide basic training and technical support to contractors to ensure that they understand their obligations under prevailing wage and reporting requirements.

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- c. Monitor contractor performance and review of certified payroll submissions and other information to help ensure contractor compliance with labor standards provisions and the payment of prevailing wages to workers.
- d. Investigate evidence of any violations, determine the validity of the allegation, and take any necessary action to resolve.

Federal funds subject to DBRA and administered through the Authority include HOME Investment Partnership (HOME), Section 811 and Risk Share.

2.2.4 HOME Investment Partnership Program (HOME): A program derived from Title II of the Cranston-Gonzales National Affordable Housing Act of 1990, (as amended) 24 CFR Part 92. Any contract for the construction of affordable housing units assisted with HOME funds made available under this subtitle shall contain a provision requiring that not less than the wages prevailing in the locality, as predetermined by the Secretary of Labor pursuant to the Davis-Bacon Act, shall be paid to all laborers and mechanics employed in the development of affordable housing involved.

The standard for coverage is assisted not financed. This means that Davis-Bacon requirements are operable without regard to whether the HOME funds are used for construction or non-construction activities. Non-construction activities include real property acquisition, architectural and engineering fees, and other professional services. In some cases, Davis-Bacon requirements may be triggered when HOME funds are used to provide down payment assistance to individual homebuyers. HOME projects can contain units that are not assisted by HOME. The threshold applies only to the number of units assisted by HOME. For unit threshold purposes, we use the number of units identified as "HOME" units under the program definition whether determined on a pro-rata basis, specific designation, or other means allowable by HUD's Office of Community Planning and Development (CPD).

Once Davis-Bacon requirements are triggered, the labor standards are applicable to the construction of the entire project, including the portions of the project other than the assisted units. Davis-Bacon requirements are applicable to contracts for construction covering 12 or more HOME-assisted units.

2.2.5 Section 811: Section 811 Supportive Housing for persons with Disabilities program provides funding to develop and subsidize rental housing with availability of supportive services for very low and extremely low-income adults with disabilities. This program is authorized by Section 811 of the national Affordable Housing Act of 1990. For further overview of the program please see HUD Handbook 4571.2 and HUD Handbook 4571.4.

Davis Bacon is triggered if there will be 12 or more units within the development assisted with Section 811 rental assistance.

2.2.6 Risk Share: A program which is implemented through the Authority and HUD under Section 542(C) of the Housing and Community Development Act of 1992.

- a. All laborers and mechanics employed by contractors or subcontractors on a Risk-Sharing project shall be paid not less than the wages prevailing in the locality in which

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the work is performed for the corresponding classes of laborers and mechanics employed in construction of similar character, as determined by the Secretary of Labor in accordance with the Davis-Bacon Act, as amended, where the project meets all of the following conditions:

- The project involves new construction or substantial rehabilitation;
 - Advances are insured; and
 - The project will contain 12 or more dwelling units.
- b. Projects that do not meet these conditions must also comply with the Davis-Bacon Act if it is required as a condition of other Federal assistance.

In addition to the exceptions noted above, Davis-Bacon Act wage requirements shall not apply to any individual that:

- a. Performs services for which the individual volunteered;
- b. Does not receive compensation for such services; or
- c. Is paid expenses, reasonable benefits, or a nominal fee for such services; and
- d. Is not otherwise employed at any time in the construction work.

2.3 CHANGE MANAGEMENT

A change order (CO) can originate from the applicant, architect of record, or GC. When an applicant receives or creates a request for a CO, they shall direct their architect of record and GC to certify the requested items are not already included in the contract for construction.

Contingency can't be used for the following:

- a. Costs to cover insurance deductible for a claim related to damage or theft.
- b. Costs for work outside of the GC's construction contract.

The change order (CO) packet shall include the following:

- a. AOR letter - explaining reason for change.
- b. AIA Document G701 – unexecuted.
- c. Supporting Documentation.

Construction Compliance will review the CO to decide whether the change is either:

- a. an unforeseen condition, or
- b. miscoordination, or
- c. a project betterment.

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After receiving the CO Determination, the applicant will:

- a. Follow the general CO and construction contingency provisions below.
- b. Submit a CO packet including the fully executed version of the AIA G701, and all required pricing back up included to achieve the CO determination with the next draw package.
- c. Allocate funds as necessary, including the use of construction contingency, to fund the CO on the next draw.
- d. Properly show the CO value on the on the OSS and CSS.

Contingency exists solely to support the trade costs incurred with the construction of the project, and only to fund project related construction work after receiving the CO determination. Contingency does not exist to fund items including, but not limited to, off-site improvements, soft costs, vehicles, applicant fees, resident services, management and operations, items not related to the project, or other non-construction items.

The applicant assumes all risk (both monetary and construction rework) in completing CO work without prior CO Determination.

The applicant is responsible to pay for any CO submitted after exhausting all contingency funds. The Authority will not provide any additional project funding after expending all contingency funds. Contingency funds are available only to the applicant and shall be reflected accordingly on the OSS.

Contractors shall not include any contingency amount in their bid whatsoever. Contractors and applicants shall not enter into any agreement accessing or splitting applicant contingency or realized construction savings at project completion. Trade savings are monitored to the end of a project at which point a change order is issued to place them into the contingency.

The Authority will maintain a log of CO determinations for every project and will evaluate future funding awards based on the criteria listed below. The Authority retains the right to deny funding for any CO not consistent with construction best practices, not in alignment with the rules listed above or elsewhere in this document.

Any deletion of Authority required work items from the scope due to costs will not be approved, and any CO requests to reimburse the contractor for installing items related to these standards will be deemed as error when presented to the Authority for CO determination.

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

CO DETERMINATION CRITERIA FOR UNFORSEEN CONDITION	
TYPE	DESCRIPTION
Concealed Condition	Unforeseen items revealed as a part of normal construction activity either underground, within walls or hidden from view prior to removal

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	of existing items not anticipated as part of the original design and are not shown within the approved construction documents.
Construction Cost Increase	If the cost increases are proven to be caused by market uncertainty and the rapid rise in construction material costs, the funds from the construction contingency may be used to pay for the cost increases.
Building Inspector or any Municipal Official Requirements	If not required by the building code but are required for building occupancy by a field inspector
CO DETERMINATION CRITERIA FOR MISCOORDINATION	
TYPE	DESCRIPTION
Building Code-Related Issue	Foreseeable costs which should have been included within the project's original design to meet local code restrictions.
Architect's, Engineer's, and Contractor's Errors and Omissions and Additional Fees	Design items which are not coordinated within the approved construction documents, or missing materials which would be necessary to complete proper construction or maintain a product warranty.
Seasonal Constraints	Winter conditions, water extraction from recent rains or other costs could result in scheduling delays. These items should be anticipated and included in the original construction budget or paid through available general conditions costs.
Other	Any additional architectural, engineering, or other services outside of the scope of work that may be required. This includes construction related delays or time extensions resulting from additional scope, extended warranties, contractor incentives, or overtime or premium time.
CO DETERMINATION CRITERIA FOR PROJECT BETTERMENT	
TYPE	DESCRIPTION
Improvements or Additional Scope	The following criteria will be used for a CO Determination of a project's upgrade (betterments): <ul style="list-style-type: none"> Improvement made in the design material quality, quantity, or performance to provide a better environment for the residents than what is represented in the approved construction documents. Additional scope items to improve the project not shown on the approved construction documents.

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3. CONSTRUCTION CLOSE-OUT

When the project is complete, prior to final project close out, several criteria must be met in order for Construction Compliance to give their approval to release the final 5% retention.

- a. The building must be occupiable.
- b. Final Certificate of Occupancy, or Final Inspection from the governing jurisdiction (if applicable).
- c. Signed PDF copy of the AIA G704 must be submitted to the construction field representative and any punch list items (punch list cost multiplied by 150% to be held in escrow).
- d. Digital signed PDF copy of the Authority's Permission to Occupy must be submitted to the construction field representative.
- e. Digital signed PDF copy of the Authority's Construction Completion Form with the Authority's construction field representative approval.
- f. All prevailing wage, Davis-Bacon, certified payrolls, and HUD Section 3 compliance requirements are met and satisfied.
- g. Environmental clearance required by demolition (i.e., asbestos and lead-based paint) clearance report and O&M manual) are received by the Authority.
- h. For projects receiving tax credits for universal design, the Authority's Construction Compliance staff will provide a final inspection approval of the items identified for scoring.
- i. Environmental No Further Remediation Letter recorded by all jurisdictions (if applicable).
- j. Blower Door and Duct Leakage tests (if applicable).
- k. At final project closeout, projects awarded funding based on scoring for pursuing green building certification, must submit the applicable third-party certification, green maintenance, tenant manual, Operations & Maintenance manual, and videos (if applicable).

When the construction is 100% complete, the Authority's Construction Compliance Coordinator will verify and inform the Authority's Manager of Construction Compliance, who will review validity of the final 5% retention release, less any holdback for punch list items as noted above.

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CONSTRUCTION DELIVERABLES AND REVIEW PROCESS

The following is a list of deliverables required to demonstrate compliance with the requirements of the Construction Activities along with their respective review process.

- a. **Application and Certificate for Payment:** To be submitted to IHDA no later than 5 days prior to the draw inspection for review by Construction Compliance. Application shall include the following: AIA Document G702, Application and Certification for Payment, and AIA Document G703 submitted by the GC and all subcontractors.
- b. **Change Order Packet:** To be submitted to IHDA no later than 30 days prior to inclusion within a construction draw package for review by Construction Compliance. Upon receipt of a completed CO packet, Construction Compliance will issue a determination within 15 days.
- c. **Submittal Log:** For projects subject to the Build America, Buy America (BABA) Act, where IHDA has provided HOME or NHTF resources, a complete submittal log detailing all covered materials utilized on the project.

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ACRONYMS & ABBREVIATIONS

- AFF:** Above Finished Floor
- ACCA:** Air Conditioning Contractors of America
- BABA:** Buy America, Build America Act
- C of O:** Certificate of Occupancy
- CDBG:** Community Development Block Grant
- CLOMA:** Conditional Letter of Map Amendment
- CLOMR:** Conditional Letter of Map Revision
- CO:** Change order
- CONS:** Construction Phase
- CPD:** Community Planning and Development
- CPVC:** Chlorinated polyvinyl chloride
- CSI:** Construction Specifications Institute
- CSS:** Construction Standard Specification
- CWHSSA:** Contract Work Hours and Safety Standards Act
- DBE:** Disadvantaged Business Enterprise
- DBRA:** Davis Bacon and Related Acts
- DES:** Design Phase
- EIFS:** Exterior Insulation and Finish Systems
- FEMA:** Federal Emergency Management Agency
- FF&E:** Furniture, Fixtures, and Equipment
- FLSA:** Fair Labor Standards Act
- GC:** General Contractor
- GFCI:** Ground-Fault Circuit-Interrupter
- HARGIS:** Historic & Architectural Resources Geographic Information System
- HCDA:** Housing and Community Development Act of 1974
- HOME:** HOME Investment Partnerships Program
- HQS:** Housing Quality Standards

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HUD: U.S. Department of Housing and Urban Development
HVAC: Heating, Ventilation, and Air Conditioning
IDNR: Illinois Department of Natural Resources
IECC: International Energy Conservation Code
IEPA: Illinois Environmental Protection Agency
IHDA: Illinois Housing Development Authority
IHPA: Illinois Historic Preservation Agency
ISGS: Illinois State Geological Survey
LIHTC: Low Income Housing Tax Credit
LRA: Labor Relations Agreement
MBE: Minority Business Enterprise
NAEP: National Association of Environmental Professionals
NEC: National Energy Code
PCBs: Polychlorinated Biphenyls
PD: Pre-Design Phase
PEX: Cross-Linked Polyethylene
PNA: Property Needs Assessment
POA: Point Of Access
PSH: Permanent Supportive Housing
QAP: Qualified Allocation Plan
RUL: Remaining Useful Life
SLF: Supportive Living Facility
UFAS: Uniform Federal Accessibility Standards
USDOL: U.S. Department of Labor
UST / AST: Underground Storage Tank and Above Ground Storage Tank
WBE: Women's Business Enterprise
WDOL: Wage Determinations OnLine

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KEY TERM DEFINITIONS

Accessible Dwelling Unit: a unit that is approached, entered, and used by people with disabilities and designed to meet all applicable code requirements.

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

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

Adaptability or Adaptable: the addition or alteration of certain building spaces and elements, such as kitchen counters, sinks and grab bars, so as to accommodate the needs of residents.

Adaptable Dwelling Unit: a unit constructed and equipped so it can be converted with minimal structural change for use by people with disabilities.

Adaptive Reuse: the process of converting or adapting structures for purposes or uses other than those initially intended, i.e. office use to residential use or conversion of a school building to apartments.

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

Alteration: any modification or renovation that affects, or could affect, the usability of the building or facility or part of the building or facility. Alteration includes* but is not limited to, remodeling, renovation, rehabilitation, reconstruction, historic preservation, historic reconstruction, historic restoration (as separately required in Section 202.5 of the Illinois Accessibility Code), changes or rearrangement of the structural parts or elements, extraordinary repairs (as defined herein), changes to or replacement of plumbing fixtures or controls, changes or rearrangement in the plan configuration of walls and full-height partitions, and changes or improvements to parking lots (as separately required in Section 202.3.3 of the Illinois Accessibility Code); per Section 3, Environmental Barriers Act (EBA).

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

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

Application: the process of applying for financing support from IHDA, inclusive of multiple phases.

Architect/Engineer of Record: an architect, professional engineer, or structural engineer, as defined by the Illinois Architecture Practice Act, the Illinois Professional Engineering Practice

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Act, or the Illinois Structural Engineering Licensing Act, who has the contract responsibility for the project, who prepares the construction documents from which the building is constructed, and who signs the required documents.

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

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

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

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

Authority: Illinois Housing Development Authority (IHDA)

Broadband Infrastructure: cables, fiber optics, wiring, or other permanent (integral to the structure) infrastructure, including wireless infrastructure, provided the installation results in broadband infrastructure in each dwelling unit meeting the Federal Communications Commission's (FCC) definition during the schematic design phase of the plans. Currently, the FCC defines broadband speeds as 25 Megabits per second (Mbps) download, 3 Mbps upload.

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

Change Order (CO): a written request prepared on AIA Form G701 that changes the scope of work from the Authority approved drawings and specifications. The change order must be signed by the Owner/Developer, Architect/Engineer of Record, and the General Contractor and presented to the Authority's field representative at least one month before requesting payment on a draw.

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

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

Construction Contingency: amount of money allocated to the project in the Authority awarded funds available to the Owner/Developer to pay for construction related items not in the approved construction documents. Value should be equal to 5% of new construction hard costs and 10% of rehabilitation hard costs. Allocation of these funds shall be in compliance with the Construction Activities.

Covered Materials (BABA): *"All iron and steel; all manufactured products and all construction materials which are defined as articles, materials, or supplies that consist of only one of the following items: non-ferrous metals, plastic and polymer-based products (including polyvinylchloride, composite building materials, and polymers used in fiber optic cables); glass (including optic glass); fiber optic cable (including drop cable), optical fiber; lumber, engineered wood, and drywall."*

Cross Slope: the slope that is perpendicular to the direction of travel; see also Running Slope.

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

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

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

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

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

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

Environmental Barrier: an element or space of the built environment which limits accessibility to or use of the built environment by persons with disabilities.

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

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

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

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

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

Floor: any level within a building that may be occupied by the public. Mezzanines and seating tiers are not included in this definition per the Illinois Accessibility Code.

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

Furniture, Fixtures & Equipment (FF&E): **Furniture** items which are generally used by the residents, guests, and staff for living and operating the project. Examples include beds, desks, chairs, couches, and office file cabinets. **Fixtures** items, which were once personal property, but due to permanent attachment is now considered as being part of the real estate. Examples include window blinds, and built-in cabinetry. **Equipment** items having a contributory association with the operation of the project. Equipment is usually considered personal property as it's not readily attached to the real estate. Examples include computers, laundry equipment, appliances, and snow blowers. Supplies are considered general purpose items and not eligible for reimbursement from the FF&E budget. Examples of supplies are hand and power tools, mops, cleaning solutions, trash cans, garden utensils, portable sports equipment, and computer ink and paper. Handheld tools including power tools or other related items that could be removed from the designated shop or location are supplies. None of the aforementioned items represents a complete list and payment of these items will be at the Authority's discretion. These items shall be in new condition or if refurbished will require Authority approval.

General Conditions: As defined in the Pre-Design Phase guidelines, the functions needed to complete the construction phase, including equipment, personnel, materials, etc. They shall include the following costs, typically identified within Construction Specifications Institute MasterFormat Divisions 0 and 1:

- project manager and superintendent,
- draw related paperwork,
- layout, surveys, plans and printing,
- material testing,
- communications,
- mobilization,

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- temporary heat and utilities,
- portable toilet(s),
- temporary fencing,
- OSHA protection,
- field office,
- hoisting equipment,
- security,
- small tools,
- disposal
- construction photography,
- cost certifications,
- audits,
- mock-up(s),
- daily construction site cleaning and final clean,
- general labor.

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

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

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

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

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

Historic Building: all buildings, parts of buildings, facilities or sites individually listed in or eligible for listing in the National Register of Historic Places, a contributing building or site in a National Register Historic District as determined by the Illinois Department of Natural Resources (IDNR) State Historic Preservation Officer or as determined by a Certified Local Government.

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designated by the IDNR, a building or site designated as a historic or architectural landmark by a local Landmarks Commission or local Historic Preservation Commission, and buildings which undergo historic reconstruction.

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

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

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

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

Interior Redecoration: replacement of interior floor, wall, and ceiling decorative finishes such as carpet, wall coverings, paint, and paneling or replacement of window treatments such as drapery, blinds, and shades or replacement of interior space lighting, fixtures, furnishings, and furniture.

Masonry Unit: brick, tile, stone, glass, or concrete block conforming to the requirements specified in Section 2103 of the 2018 International Building Code.

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

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

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

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

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

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

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

Overhead: the expenses necessary to conduct a business. Cost shall also include those specific to the project and include general liability insurance, transportation, travel expenses, temporary housing, etc.

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

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

Preparer: as defined in Pre-Design Phase guidelines, the individual engaged in preparation of PNA on behalf of the Applicant.

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

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

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

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

Project Sites: the intended location(s) for which the Application is being prepared.

Public: any group of people who are users of the building and employees of the building, excluding those people who are employed by the owner of a building for construction or alteration of a building.

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

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

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

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

Requirements: Design, Construction, & Regulatory Compliance Requirements for development teams receiving IHDA resources.

Residential Square Footage (SF): in new construction this is a measurement calculated from a continuous end to end delineation from the outside of the exterior assembly. In rehabilitation this is a measurement calculated from a continuous end to end delineation from the inside of the exterior assembly.

APPENDIX



Residential Unit Area SF: measurement calculated from a continuous end to end delineation comprised from the following strike criteria: 1) interior side of an exterior assembly, 2) tenant side of a shaft, utility, common area partition 3) midline of the tenant demising partition.

Running Slope: the slope that is parallel to the direction of travel; see also Cross Slope.

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

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

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

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

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

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

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

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

Type A Unit: Reference ICC/ANSI 117.1 2009

Type B Unit: Reference ICC/ANSI 117.1 2009

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

APPENDIX



Visibility: the requirement that all single-family homes, townhouses, multi-story housing units, and multi-family apartment units provide accessible features that permit people with mobility impairments to visit (enter and stay, but not live in) a residence. See the Design Activities for additional guidance.

9. Resale or Recapture Guidelines. Below, the grantee must enter (or attach) a description of the guidelines that will be used for resale or recapture of HTF funds when used to assist first-time homebuyers. If the grantee will not use HTF funds to assist first-time homebuyers, enter "N/A".

N/A

10. HTF Affordable Homeownership Limits. If the grantee intends to use HTF funds for homebuyer assistance and does not use the HTF affordable homeownership limits for the area provided by HUD, it must determine 95 percent of the median area purchase price and set forth the information in accordance with §93.305. If the grantee will not use HTF funds to assist first-time homebuyers, enter "N/A".

The grantee has determined its own affordable homeownership limits using the methodology described in § 93.305(a)(2) and the limits are attached.

<TYPE=[section 3 end]>

N/A

11. Grantee Limited Beneficiaries or Preferences. Describe how the grantee will limit the beneficiaries or give preferences to a particular segment of the extremely low- or very low-income population to serve unmet needs identified in its consolidated plan or annual action plan. If the grantee will not limit the beneficiaries or give preferences to a particular segment of the extremely low- or very low-income population, enter "N/A."

Any limitation or preference must not violate nondiscrimination requirements in § 93.350, and the grantee must not limit or give preferences to students. The grantee may permit rental housing owners to limit tenants or give a preference in accordance with § 93.303(d)(3) only if such limitation or preference is described in the action plan.

Under IHDA's LIHTC Program, developers/owners are incentivized to set aside 10-15% of their housing units for supportive housing populations under the Statewide Referral Network (SRN). These are defined as persons with disabilities or homeless/at risk of homelessness AND @ 30% of AMI or below. This set-aside may be triggered if an NHTF project is also allocated LIHTCs as part of its project financing

12. Refinancing of Existing Debt. Enter or attach the grantee’s refinancing guidelines below. The guidelines describe the conditions under which the grantee will refinance existing debt. The grantee’s refinancing guidelines must, at minimum, demonstrate that rehabilitation is the primary eligible activity and ensure that this requirement is met by establishing a minimum level of rehabilitation per unit or a required ratio between rehabilitation and refinancing. If the grantee will not refinance existing debt, enter “N/A.”

Not Applicable: IHDA anticipates funding primarily new affordable housing development, and it will not give priority to such preservation projects which are primarily refinancing existing debt. If refinancing occurs, it will only be permitted when:

1. New investment is being made to create additional affordable units:
2. refinancing is necessary to reduce the overall housing cost and to make the housing more affordable, and is proportional to the number of HTF-assisted units in the rental project; and
3. the development cost attributable to the HTF units is greater than the amount of debt to be refinanced that is attributable to the HTF units.

The review of the management practices of the applicant must demonstrate that any proposed rehabilitation is not a result of disinvestment in the property.

Discussion:

Program Specific Requirements - HOPWA

HOPWA

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

The Department requires the HIV Care Connect Lead Agents to develop annual work plans prior to receiving funds. The work plans must identify specific service and estimated number of person’s that will be served by service category. The work plan will include descriptions of populations to be served,

the care and service needs of the population and ways in which the HIV Care Connect Regions will ensure that the most in need will receive housing assistance. The State ultimately has the responsibility to ensure that grantees and project sponsors are caring out their programs in accordance with all applicable laws and relations.

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

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

Attachments

The State of Illinois Consolidated Plan

Draft 2025-2029 Consolidated Plan

Tuesday, June 24, 2025, at 10:30 A.M.

Public Hearing Agenda

- ❖ Welcome and Introductions/Overview of Agenda – Compliance and Reporting (CR), Strategic Planning and Reporting (SPAR), Illinois Housing Development Authority (IHDA)

- ❖ Historical Overview of the State Consolidated Plan; Citizen Participation Process; State Priorities – IHDA
 - The Comprehensive Housing Plan Act (P.A. 94-965) and the Annual Comprehensive Housing Plan

- ❖ State's Draft 2025-2029 Consolidated Plan and the HUD Five Formula Grant Programs:
 - Community Development Block Grant (CDBG) – Illinois Department of Commerce and Economic Opportunity (DCEO)

 - Home Investment Partnerships Program (HOME) – Illinois Housing Development Authority (IHDA)

 - National Housing Trust Fund (HTF) – Illinois Housing Development Authority (IHDA)

 - Emergency Solutions Grant (ESG) – Illinois Department of Human Services (IDHS)

 - Housing Opportunities for Persons With AIDS (HOPWA) – Illinois Department of Public Health

- ❖ Public Comments and Testimony / Question and Answer Period Regarding State of Illinois 2025-2029 Consolidated Plan

- ❖ Adjournment

State of Illinois 2025-2025 Consolidated Plan Public Comments Compilation

The State of Illinois Consolidated Plan

Tuesday, June 25, 2025 – 2025 Consolidated Plan Public Hearing

Bulleted Formula Grant Program Administrator Synopsis

The State of Illinois Community Development Block Grant (CDBG) administered by the Illinois Department of Commerce and Economic Opportunity (DCEO), has been allocated \$28,988,172.00 for 2025, about \$85,000 less than in 2024. Of this amount, the State can use 3% plus \$100,000 for Administration and Technical Assistance.

Funds will be distributed as follows:

- DCEO has used the 2025 allocation as the basis for the 5 years of the Consolidated Plan, but CDBG allocations have been steadily decreasing and the program as a whole has been eliminated from the President's and HUD's proposed 2026 budget
- After Admin and TA, \$28,018,527 is available for grants

Allocations and Goals covering the 5 years:

- Housing Rehabilitation \$40,000,000 Goal of 615 homes
- Public Infrastructure \$79,940,860 Goal of serving 39,970 people
- Community & Economic Revitalization \$25,000,000 Goal of assisting 5 businesses and creating 100 jobs: demolishing 5 buildings; completing 5 sidewalk/streetscape projects; completing 5 renovation/conversion of closed buildings; completing 5 non-residential historic preservation projects.
- Disaster Recovery is included in the Plan but does not have any funds allocated.
- The State does not have and will not pursue a Section 108 program.

The 2025 HOME allocation is \$15,688,880.15, administered by the Illinois Housing Development Authority (IHDA). Of the 2025 HOME amount, the State can use 10%, or \$1,568,888 for Program Administration. Under HOME, the State allocation is augmented with program income; to be expended before the yearly allocation Under the 2025 Action Plan, the HOME Program will restrict funding to multi-family new construction and rehabilitation

- IHDA will use up to 10% of the 2025 allocation for program administration. (10% is made available for administrative costs under HUD Regulation)
- Multi-family– open applications, though usually combined w/TCs. Common application online
- Estimated 2025 production of 59 HOME units: 35/24 split between New Construction and Rehabilitation
- Strategic Plan 5Yr goal estimate is 345 newly constructed and rehabbed units funded under the 2025-2029 Consolidated Plan
- HOME breakdown for 2025 – 2029 Consolidated Plan is 207 units constructed, and 138 units rehabbed

The 2025 Federal Housing Trust Fund allocations, also administered by IHDA is \$6,654,452.74, an increase from the 2024 allocation of \$6,053,257.00 with 10% of the amount set aside for Program administration. Program Income has not been generated under the HTF Program. For 2025, the estimated goal is 56 units for ELI households under the federal Housing Trust Fund

- Estimated 2025 production of 56 HTF units: 34/22 projection (split between New Construction and Rehabilitation)
- Strategic Plan 5-Year goal estimate is 283 newly constructed and rehabbed units funded under the 2025-2029 Consolidated Plan
- HTF breakdown for 2025 – 2029 is 170 units constructed, and 113 units rehabbed

State of Illinois 2025-2025 Consolidated Plan Public Comments Compilation

The 2025 allocation for Emergency Solutions Grants (ESG) Program is \$5,190,081.00.

- Not all eligible ESG activities are funded under each year of the five-year Consolidated Plan
- Projects assisting 1200 households via Tenant-based rental/rapid rehousing
- Provide Homeless Person Overnight Shelter to 12,500
- Conduct Street Outreach to 3,000

The 2025 allocation for Housing Opportunities for Persons with AIDS Program (HOPWA) is \$2,582,959.00. One-year goals for the number of households to be provided assistance through the use of HOPWA are:

- Short-term rent, mortgage, and utility assistance to prevent homelessness of the individual or family – 45
- Tenant-based rental assistance – 300
- Units provided in permanent housing facilities developed, leased, or operated with HOPWA funds – 20

After the presentations, IHDA Staff made a request for any questions or comments. There were no questions, no comments, and the meeting adjourned.

No public comments, letters, emails or phone calls were received during the Public Comments Period for the Draft 2025-2029 Consolidated Plan.

STATE OF ILLINOIS PUBLIC NOTICE
2nd Public Hearing on the
Draft State of Illinois 2025-2029 Consolidated Plan

To obtain public input from Illinois residents and to comply with the United States Department of Housing and Urban Development (HUD) rules, which require the State to develop a Consolidated Plan, the Illinois Housing Development Authority (IHDA), in coordination with the Illinois Department of Commerce and Economic Opportunity (DCEO), the Illinois Department of Human Services (IDHS), the Illinois Department of Public Health (IDPH), and other State agencies, announces the availability of the draft 2025-2029 Consolidated Plan. This draft document will be available to the public electronically by Friday, September 5, 2025, and will also be available on request in limited hard copies by mail.

IHDA was designated on June 16, 1994, as the lead State entity for developing the Consolidated Plan and related documents. This draft plan covers those areas of the State that are not otherwise under the jurisdiction of a local Consolidated Plan. It includes summaries of the funding for the following formula grant programs: Community Development Block Grant (CDBG); HOME Investment Partnerships; Emergency Solutions Grants (ESG); the Housing Opportunities for Persons with AIDS (HOPWA); and the (federal) Housing Trust Fund (HTF). An electronic version will be available on IHDA's website, www.ihda.org. Electronic copies will also be available through the State Library network, and accessible at other local libraries located throughout the State.

The State will hold one hybrid Public Hearing on Tuesday, September 23, 2025, at 10:30 A.M. via Microsoft Teams, telephone, and in person via the following address:

Illinois Housing Development Authority (offices)
111 E. Wacker Drive, Suite 1000
Chicago, Illinois 60601

In person participants are encouraged to sign the attendance sheet which will be available on-site at the location.

The day of the Public Hearing, use the Meeting Link:

https://teams.microsoft.com/join/19%3ameeting_NDImY2ZlZWMeNDU3MS00Yk1LWlyMjltM201Njc5ZTU2ODF%40thread.v2/0?context=%7b%22id%22%3a%22acc83820-8b8f-4dc8-b270-266cb24e926f%22%2c%22oid%22%3a%22c28921c8-4480-4667-bdaf-0e102c5d5e79%22%7d

Join by Meeting Number:
Meeting ID: 299 651 478 390 6
Meeting Passcode: 7jp6fA6g

Join by Phone:
Phone Conference Number: (872) 267-6689
Phone Conference ID: 650 327 549#

Call-in participants are encouraged to leave their names and organizations in the chat box.

Written comments are also welcomed by email to hhughes@ihda.org or cshaw@ihda.org or mailed directly to IHDA to ensure that comments receive a written response. Hearing-impaired and sight-impaired individuals in need of services such as an interpreter or documents in large print/Braille are asked to make requests directly to IHDA at the telephone numbers below at least five (5) business days before the public hearing. IHDA will make reasonable efforts to accommodate such requests. To obtain additional information concerning the public hearing, please call (312) 836-5320 or TDD/TTY (312) 836-5222.

The 2025-2029 Consolidated Plan 30-Day public comments period starts Monday, September 8, 2025, thru Tuesday, October 7, 2025.

All public comments must be received by IHDA, or DCEO, IDHS, or IDPH as administrators of their respective programs (CDBG, ESG or HOPWA), by close of business on Tuesday, October 7, 2025. The State then plans to submit the final 2025-2029 Consolidated Plan to HUD via IDIS. For further information and written comments, contact:

Illinois Housing Development Authority
111 E. Wacker, Suite 1000
Chicago, IL 60601
Attn: SPAR/Compliance and Reporting
IP Phone: 312-836-5320 Email: hhughes@ihda.org
IP Phone: 312-836-7410 Email: cshaw@ihda.org

Dated: September 3, 2025

AVISO PÚBLICO DEL ESTADO DE ILLINOIS
Segunda Audiencia Pública sobre el Borrador del Plan Consolidado del Estado de Illinois 2025-2029

Para obtener la opinión pública de los residentes de Illinois y cumplir con las normas del Departamento de Vivienda y Desarrollo Urbano de los Estados Unidos (HUD), que exigen que el Estado desarrolle un Plan Consolidado, la Autoridad de Desarrollo de Vivienda de Illinois (IHDA), en coordinación con el Departamento de Comercio y Oportunidades Económicas de Illinois (DCEO), el Departamento de Servicios Humanos de Illinois (IDHS), el Departamento de Salud Pública de Illinois (IDPH) y otras agencias estatales, anuncia la disponibilidad del borrador del Plan Consolidado 2025-2029. Este borrador estará disponible para el público en formato electrónico a partir del viernes 5 de septiembre de 2025 y también se enviará por correo, previa solicitud, en ejemplares impresos limitados.

La IHDA fue designada el 16 de junio de 1994 como la entidad estatal principal para el desarrollo del Plan Consolidado y los documentos relacionados. Este borrador del plan abarca las áreas del Estado que no están bajo la jurisdicción de un Plan Consolidado local. Incluye resúmenes de la financiación de los siguientes programas de subvenciones de fórmula: Subvención en Bloque para el Desarrollo Comunitario (CDBG); Asociaciones de Inversión HOME; Subvenciones para Soluciones de Emergencia (ESG); Oportunidades de Vivienda para Personas con SIDA (HOPWA); y el Fondo Fiduciario de Vivienda (HTF) [federal]. Una versión electrónica estará disponible en el sitio web de la IHDA, www.ihda.org. También se podrán obtener copias electrónicas a través de la red de Bibliotecas Estatales, así como en otras bibliotecas locales de todo el estado.

El Estado celebrará una Audiencia Pública híbrida el martes 23 de septiembre de 2025 a las 10:30 a. m., a través de Microsoft Teams, por teléfono y en persona a través de la siguiente dirección:

Autoridad de Desarrollo de Vivienda de Illinois
111 E. Wacker Drive, Suite 1000
Chicago, Illinois 60601

Se anima a los participantes en persona a firmar la hoja de asistencia que estará disponible en el lugar.

El día de la Audiencia Pública, utilice el Enlace de la Reunión:

https://teams.microsoft.com/join/719%3ameeting_MjNmOTI1dNk0MTIhM00ZicF1WFMDc1Nk0BM2I0Z1YyZTM3%40linea1.v3/0?context=9%71b%22T0P%22%31%22acc%3E20-8b8E-4c8B-b270-266cb24e926f%22%2c%3E240b1%22%3E%22c28921c8-4480-4667-bd8E-0e102c5a5c79%22%7d

Únase por número de reunión:
ID de reunión: 299 651 478 390 6
Código de acceso de la reunión: 7ip6fA6g

Únase por teléfono:
Número de conferencia telefónica: (872) 267-6689
ID de la conferencia telefónica: 650 327 549#

Se anima a los participantes virtuales a dejar sus nombres y organizaciones en el cuadro de chat.

Los comentarios escritos también serán bienvenidos por correo electrónico a dmarxhan@ihda.org o enviados directamente a IHDA para garantizar que los comentarios reciban una respuesta por escrito. Las personas con discapacidad auditiva y visual que necesiten servicios como un intérprete o documentos en letra grande/Braille deben realizar solicitudes directamente a IHDA a los números de teléfono que aparecen a continuación al menos cinco (5) días hábiles antes de la audiencia pública. IHDA hará esfuerzos razonables para atender dichas solicitudes. Para obtener información adicional sobre la audiencia pública, llame al (312) 836-5250 o TDD/TTY (312) 836-5222.

El período de comentarios públicos de 30 días del Plan Consolidado 2025-2029 comienza el lunes 8 de septiembre de 2025 hasta el martes 7 de octubre de 2025.

Todos los comentarios públicos deben ser recibidos por la IHDA, el DCEO, el IDHS o el IDPH, como administradores de sus respectivos programas (CDBG, ESG o HOPWA), antes del cierre de operaciones del martes 7 de octubre de 2025. Posteriormente, el Estado planea presentar el Plan Consolidado 2025-2029 final al HUD. Para más información y comentarios por escrito, comuníquese con:

Autoridad de Desarrollo de Vivienda de Illinois
111 E. Wacker, suite 1000
Chicago, IL 60601
A la atención de: SPAR
Teléfono IP: 312-836-5250
dmarxhan@ihda.org

Fecha: 3 de septiembre de 2025

The State of Illinois

Draft HUD 2025-2029 Consolidated Plan

Tuesday, September 23, 2025, at 10:30 A.M.

2ND Public Hearing Agenda

- ❖ Welcome and Introductions/Overview of Agenda – Compliance and Reporting (CR), Strategic Planning and Reporting (SPAR), Illinois Housing Development Authority (IHDA)
- ❖ Historical Overview of the State Consolidated Plan; Citizen Participation Process; State Priorities – IHDA
 - The Comprehensive Housing Plan Act (P.A. 94-965) and the Annual Comprehensive Housing Plan
- ❖ State’s Draft HUD 2025-2029 Consolidated Plan and the HUD Five Formula Grant Programs:
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 - National Housing Trust Fund (HTF) – Illinois Housing Development Authority (IHDA)
 - Emergency Solutions Grant (ESG) – Illinois Department of Human Services (IDHS)
 - Housing Opportunities for Persons With AIDS (HOPWA) – Illinois Department of Public Health
- ❖ Public Comments and Testimony / Question and Answer Period Regarding State of Illinois HUD 2025-2029 Consolidated Plan
- ❖ Adjournment

Financing the creation and preservation of affordable housing

The State of Illinois Consolidated Plan

2025-2029 Consolidated Plan 2nd Public Hearing

Tuesday, September 23, 2025

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2025-2029 Consolidated Plan 2nd Public Hearing

Tuesday, September 23, 2025

The State of Illinois Consolidated Plan

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- Short-term rent, mortgage, and utility assistance to prevent homelessness of the individual or family – 45
- Tenant-based rental assistance – 300
- Units provided in permanent housing facilities developed, leased, or operated with HOPWA funds – 20

After the presentations, IHDA Staff made a request for any questions or comments. There were no verbal questions or comments, and no questions or comments listed in the Chat.

Then, the meeting was adjourned.

The State of Illinois Consolidated Plan

The 2nd Public Comment Period began Monday, September 8, 2025, and ended Tuesday, October 7, 2025.

One public comments letter, from The Network Advocating Against Domestic Violence, was received on Saturday, October 4, 2025. No other emails or calls were received during the 2nd Public Comments Period. The letter from the Network Advocating Against Domestic Violence is attached in its entirety below.

As the comments made by The Network Advocating Against Domestic Violence were received on the weekend two days before the end of the 2nd Public Comments Period on Tuesday, October 7, 2025. IHDA and IDHS are still working on developing a response, along with material changes to the 2025-2029 Consolidated Plan to address these valid concerns. The State's response to the comments letter will be included in an update to the final Version of the 2025-2029 Consolidated Plan.

The development of both the Citizen Participation Plan and 5-Year Consolidated Plan provided more than ample opportunity for the public to provide comments for the 2nd Public Comments Period.

State of Illinois 2025-2029 Consolidated Plan 2nd Public Comments Compilation

From: [Jackie Koriath](#)
To: [Burton Hughes](#); [Concra Shaw](#)
Subject: [EXTERNAL] Comments on the State of Illinois Consolidated Plan
Date: Saturday, October 4, 2025 1:05:13 PM
Attachments: [image001.png](#)
[Network-Illinois Five Year Consolidated Plan Comments.pdf](#)

Good Afternoon,

Please find our comments on the State of Illinois Consolidated Plan attached. If you have any questions, do not hesitate to reach out to me directly.

Thank you,

Jackie

Jacklyn Zarack Koriath, J.D. (she/her/hers)
Director of Housing Advocacy
The Network: Advocating Against Domestic Violence
Email: jkoriath@the-network.org
Phone: (312) 528-5461
www.the-network.org
Illinois Domestic Violence Hotline: 1-877-863-6338



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October 4, 2025

Illinois Housing Development Authority
111 E. Wacker Drive, Suite 1000
Chicago, Illinois 60601
By Electronic Mail (blughes@ihda.org and csbaw@ihda.org)

Re: DRAFT State of Illinois 2025 – 2029 Five-Year Consolidated Plan

These comments are submitted on behalf of The Network: Advocating Against Domestic Violence regarding the DRAFT State of Illinois 2025 – 2029 Five-Year Consolidated Plan, which was released for public comment on September 8, 2025.

I. The Network’s Statement of Interest

The Network is a collaborative membership dedicated to improving the lives of those impacted by gender-based violence (“GBV”). The Network has worked tirelessly to end our society’s tolerance of GBV through public policy and advocacy work, educational opportunities, connecting the public to services, and by providing centralized resources to service providers in the GBV community for the past 40 years. The Network engages in housing advocacy and economic justice work focused on assisting housing providers in providing trauma-informed, confidential and safe services, increasing access to housing for survivors of GBV, and improving system responses to those who are at risk of experiencing homelessness due to GBV. We also work directly with survivors who are experiencing housing or economic instability related to GBV, including eviction, coerced debt, and credit issues. Additionally, the Network provides immediate connection to direct service providers with availability to support victims and survivors in need through the Illinois Statewide Domestic Violence Hotline (“Hotline”). In 2024, the Hotline received a total of 59,704 contacts, (calls, texts, and chats), with 18,940 requests for shelter and an additional 2,325 requests for affordable or transitional housing across Illinois, a 77% increase from 2023.

II. Comments on the DRAFT State of Illinois 2025 – 2029 Five-Year Consolidated Plan

- a. *The DRAFT State of Illinois 2025 – 2029 Five-Year Consolidated Plan was created without the insight and experience of survivors and victim services providers but needs to be drafted through this GBV lens to benefit both survivors and all people experiencing homelessness in Illinois.*

Each priority population explicitly identified in the DRAFT State of Illinois 2025-2029 Five-Year Consolidated Plan (“the Draft Plan”), including seniors, people with disabilities, and low and moderate income people, also consists of survivors of domestic violence because an

estimated 2.4 million Illinois residents will experience domestic violence in their lifetime.¹ This intersectionality jumps even higher when you consider the number of Illinoisans who experience sexual violence and stalking, and yet the Draft Plan fails to include the insight of survivors and their support networks when planning how to address homelessness and distribute resources.

The Network previously commented on the Draft 2024 State of Illinois Action Plan – Consolidated Plan and “implore[d] the Illinois Housing Development Authority (“IHDA”) to connect with survivors with lived experience and victim service providers so that their voices can be included regarding resources and use of funds.” In that comment, we offered to facilitate or support these conversations at IHDA’s request. Despite this previous comment and our offer, from the Draft Plan, it appears that IHDA has continued to exclude the voices of survivors of gender-based violence and their advocates from the Draft Plan. This exclusion is particularly concerning given our previous outreach on this issue and the long-term, multi-year nature of the Draft Plan.

The Draft Plan identifies various agencies, groups, organizations, and others who participated in developing the Draft Plan however, just as in years past, victim service providers and other GBV advocates whose primary focus is supporting survivors of GBV are noticeably absent from the list of participating agencies. Instead, the primary agencies consulted are limited to state-level departments or general housing providers and systems, none of which are experts in or focused on navigating the complex issues that survivors of GBV and their advocates face on a daily basis. In fact, the Illinois Department of Human Services is the only agency listed that includes victims of domestic violence in their services category, but it is not clear whether this agency was consulted on survivors’ unique needs. *See* Draft Plan at 10.

Not having survivors and their support networks adequately represented in developing the Draft Plan—including the organizations that provide shelter specifically to those fleeing GBV—is unacceptable, given the number of survivors that the Draft Plan will affect.² Reevaluating the Draft Plan through a GBV lens, by including the voices of survivors and their advocates, will only serve to strengthen the Draft Plan in its entirety for all vulnerable populations across the state.

b. In addition to being a special population, survivors of GBV need to be considered within all identified priority populations in the Draft Plan because all eight underserved populations will inevitably include survivors of GBV.

The Network is encouraged by IHDA’s initial inclusion of victims of domestic violence as a special population, but this area needs significant development before the final draft so that the needs of survivors and the resources to be allocated to them are clearly outlined and identified. Without capturing and addressing homelessness caused by gender-based violence—a leading cause of homelessness for women and children—the Draft Plan cannot meaningfully address housing or community development needs in Illinois. Notably, the Draft Plan itself mentions how prioritizing specific populations directly addresses and works to solve

¹ QuickFacts: Illinois, U.S. Census Bureau. (2023). <https://www.census.gov/quickfacts/fact/table/US/PST045223>; Black, M.C., Basile, K.C., Breiding, M.J., Smith, S.G., Walters, M.L., Merrick, M.T., Chen, J., & Stevens, M.R. (2011). The National Intimate Partner and Sexual Violence Survey (NISVS): 2010 Summary Report. Atlanta, GA: National Center for Injury Prevention and Control, Centers for Disease Control and Prevention.

² There are estimated to be over 3 million survivors of domestic violence in the state of Illinois. *See National intimate partner and sexual violence survey*, (2015) National Center for Injury Prevention and Control, Centers for Disease Control and Prevention.

homelessness for that population. See Draft Plan Page 48 (explaining work certain CoCs have done to effectively end veterans' homelessness).

While the Draft Plan provides details about Continuum of Care services, state agency and division programs, and public housing infrastructure to show where Illinois is succeeding in providing adequate housing for those in need, and where there may still be gaps in services, it fails to identify how those resources will be prioritized for special needs populations. See Draft Plan at 39, 58, 119, 120 (outlining goals for construction and rehabilitation without set asides). Identifying set asides and prioritization is essential because allocating housing units specifically to survivors of GBV meets a large service shortage by increasing available beds at domestic violence shelters and temporary housing at a time when there is a severe gap between need and available resources.³ Without addressing these gaps, often survivors are not able to transition to market-rate housing after that time and, at the end of the program, they return to shelter or must stay doubled-up with family or friends. A marked effort to address specialized populations of marginalized groups is required in the final draft otherwise these groups will continue to be underserved.

In its finalized version, IHDA must edit the Draft Plan to increase housing resources for survivors of GBV. One path to supporting permanent and affordable housing for survivors of GBV is for projects to commit to preferencing survivors of GBV—which is especially important given how few long-term housing supports are in place for survivors. Preferencing survivors in housing is a well-established practice that could make a real difference for survivors' ability to access permanent housing if adopted by IHDA in the Draft Plan's final version. For instance, the Chicago Housing Authority ("CHA") allows a preference in its public housing program, which has decreased wait times for survivors to around 4-5 years in its properties. See 24 C.F.R. 960.206(b)(4); CHA Admissions and Continued Occupancy Policy at pg. 15 (preferencing domestic violence victims second). While this may not seem significant, many waitlists in CHA's programs are over 25 years, so the preference has decreased survivors' wait time for public housing by as much as 20 years. CHA's Administrative Plan for 2024 also includes a preference for survivors of GBV referred by the City of Chicago or Chicago's Continuum of Care through the Coordinated Entry System. See CHA FY2025 Housing Choice Voucher Program Administrative Plan at 4-5 (preferencing survivors of GBV fourth). Preferencing is vaguely mentioned at various points throughout the Draft Plan for certain populations (including veterans and people with disabilities), but it never explicitly describes any preferencing for survivors of GBV. See Draft Plan at 24, 127, 206, 217, 289. The final version of the Draft Plan should utilize preferencing for survivors of GBV specifically.

In addition to identifying survivors as a special population, the Draft Plan must consider that survivors are an inevitable part of all of the other eight identified underserved populations. The intersection between homelessness/housing insecurity and GBV is well-documented, with many survivors facing significant barriers to accessing safe and stable housing.⁴ Given these intersections, all of the eight underserved populations identified in the Draft Plan will include

³ In 2024, there were no available beds or cribs in DV shelters in Chicago for 130 days. The situation was even more dire for suburban DV shelters where, for nearly half the year or 173 days, there were no available beds or cribs for survivors in urgent need of safe haven. See *Measuring Safety, Illinois Domestic Violence Hotline Report (2024)*, The Network, at 25. There is a similar lack of resources for survivors exiting rapid rehousing, leaving many survivors to reconcile with the people harming them after exiting these programs.

⁴ Thirty-eight (38%) of all domestic violence victims become homeless at some point in their lifetime. Additionally, domestic violence is one of the leading causes of homelessness for children in the United States. See *Domestic Violence and Homelessness (2016)*, The Administration for Children and Families, at 2.

survivors of GBV. See Draft Plan at 1. To view GBV as a solitary issue or isolated within one population ignores the reality that survivors are also people living with disabilities, seniors, people living in low-income households, etc. Recognizing that nuance can guide the Draft Plan in coming to truly holistic housing solutions for the state's most vulnerable populations.

Feedback included from Continua of Care throughout Illinois describes these intersecting identities: "...history and ongoing troubles with substance abuse; mental health issues; being a single parent household; a lack of childcare; a lack of education and job skills; no support network; being unemployed or underemployed; and, being a domestic violence victim. Some can be at risk for two or more, if not all of these circumstances." See Draft Plan at 47. The Draft Plan itself recognized this reality by noting the intersections of risk factors. There is extensive evidence showing the ways in which GBV impacts financial stability, housing, mental and physical well-being, and access to resources, all of which immediately lessen an individual's capacity to obtain or maintain safe housing. As such, the Draft Plan must explicitly address the need for increased housing resources for survivors of GBV throughout so that those fleeing or facing violence can access safety.

c. The Draft Plan Must Address Recent Efforts to Criminalize Homelessness.

As Illinois considers how it will utilize resources and address homelessness throughout the state, it must address the increasing problem of the criminalization of homelessness, which is being implemented in counties and municipalities through ordinances that punish Illinoisans for sleeping outside.⁵ "Illinois is currently second in the nation for the number of municipalities that have passed anti-homelessness ordinances . . . only second to California. There are about 27 ordinances that we know about," *CCH Staff and Leaders Speak on the Criminalization of Homelessness at Loyola Law School Symposium*, (April 10, 2025), Chicago Coalition to End Homelessness, <https://chicagohomeless.org/cch-staff-and-leaders-speak-on-the-criminalization-of-homelessness-at-loyola-law-school-symposium/>. There has been a clear trend to criminalize unhoused individuals which the Draft Plan fails to address.

The state of Illinois does not have adequate space in shelters to support families and individuals experiencing homelessness, and it must address how it will prevent those who are unhoused for being penalized based on their housing status. As explained above, domestic violence shelters in Chicago and Cook County are often at capacity and without available beds.⁶ The situation is similar statewide, where there is no guaranteed right to shelter for someone experiencing homelessness, unlike states like Massachusetts where right to shelter is protected for families and pregnant women. See generally Mass. General Laws Ch. 23B § 30. A direct result of the lack of safe and affordable housing is encampment communities, where unhoused individuals gather for safety and community. See *Understanding Encampments of People Experiencing Homelessness and Community Responses: Emergency Evidence as of Late 2018*, U.S. Department of Housing and Urban Development (Jan. 7, 2019) at 4 ("Shortcomings in the shelter system are consistently identified as a primary factor that 'pushes' people to congregate in

⁵ IDHR and Illinois Office to Prevent and End Homelessness Issue Letter *Safeguarding Civil Rights for Persons Experiencing Homelessness*, Illinois Department on Human Rights (Mar. 13, 2025), available at <https://dhr.illinois.gov/dhcr-us/illinois-news-issues-events/2025-03-13-integer-homelessness.html> (quoting Chief Homelessness Officer Christine Haley who stated "[i]n the last 15 months, at least 25 Illinois communities have passed ordinances criminalizing unsheltered homelessness. These approaches lead to increased isolation, additional barriers to housing and unnecessary cycles of incarceration").

⁶ See *Measuring Safety, Illinois Domestic Violence Hotline Report* (2024), The Network, at 25.

encampments”). These communities have been regularly displaced—losing property, disconnecting people from their community and supportive services, destroying essential documents and medicines, and exposing people to more dangerous living situations and violence—as a result of these ongoing initiatives throughout Illinois to criminalize homelessness.

In its final version, it is critical that IHDA directly acknowledge the impact that recent efforts to criminalize homelessness will have on people at risk of homelessness, especially survivors of GBV. These actions are especially dangerous for survivors of GBV who face additional safety risks while being homeless, including threats of further violence, and may now have the added barrier of justice-involvement as they seek new housing.

d. The Violence Against Women Act (“VAWA”) protects the right for tenants to report crime or seek emergency assistance without risking their housing, and the Draft Plan must reflect the implementation of this protection.

When VAWA was reauthorized in 2022, it included a new right to report crime and other emergencies provision. See 34 U.S.C. 12495. Unlike some of VAWA’s other housing protections, the right to report crime applies to all areas that receive Community Block Development Grant (“CDBG”) funding, which is referenced throughout the plan and utilized by the majority of municipalities in Illinois. 34 U.S.C. 12495(a). VAWA requires CDBG recipients to:

- Report on the existence of laws or policies they or their subgrantees (or state grant recipients) adopted that impose penalties based on requests for law enforcement or emergency assistance or based on criminal activity that occurred at a covered property; and
- Certify that they and their subgrantees are in compliance or describe the steps they and their subgrantees must take to comply within 180 days of the report to HUD.

34 U.S.C. 12495(c).

The right to report crime addresses the discriminatory practice seen in many local municipalities through Illinois of penalizing survivors and other individuals, including landlords, who seek law enforcement or emergency assistance for protection. 34 U.S.C. 12495. This practice is often seen locally through nuisance ordinances or crime-free housing programs, which have a disproportionate impact on survivors and other populations, such as people with disabilities, as these populations often need to contact emergency services more frequently due to the violence they are experiencing or to seek healthcare or other forms of emergency assistance.

The omission of VAWA and the implementation of the right to report crime will lead to ongoing noncompliance with the law, leaving survivors at risk of losing their housing when they attempt to contact emergency assistance when experiencing violence. The final plan must ensure housing providers are complying with all VAWA’s housing provisions, including the new right to report crime.

III. Conclusion

To provide effective housing support, the voices of survivors, victim service providers, and others who work with survivors of GBV need to be deliberately considered and met with targeted strategies and necessary resources. The Plan has failed to consider or include the needs of survivors, and this oversight must be addressed. If you have any questions about these comments, please contact us at the information below.



Thank you for your attention to these matters.

Jaelyn Zarack Koriath, J.D. (she/her/hers)
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The Network: Advocating Against Domestic Violence
Email: jkoriath@the-network.org
Phone: (312) 528-5461
www.the-network.org
Illinois Domestic Violence Hotline: 1-877-863-6338

Grantee SF-424's and Certification(s)

STATE CERTIFICATIONS

In accordance with the applicable statutes and the regulations governing the consolidated plan regulations, the State certifies that:

Affirmatively Further Fair Housing -- The State will affirmatively further fair housing.

Uniform Relocation Act and Anti-displacement and Relocation Plan -- It will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, (42 U.S.C. 4601-4655) and implementing regulations at 49 CFR Part 24. It has in effect and is following a residential anti-displacement and relocation assistance plan required under 24 CFR Part 42 in connection with any activity assisted with funding under the Community Development Block Grant or HOME programs.

Anti-Lobbying -- To the best of the State's knowledge and belief:

1. No Federal appropriated funds have been paid or will be paid, by or on behalf of it, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement;
2. If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, it will complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions; and
3. It will require that the language of paragraphs 1 and 2 of this certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly.

Authority of State -- The submission of the consolidated plan is authorized under State law and the State possesses the legal authority to carry out the programs under the consolidated plan for which it is seeking funding, in accordance with applicable HUD regulations.

Consistency with plan -- The housing activities to be undertaken with Community Development Block Grant, HOME, Emergency Solutions Grant, and Housing Opportunities for Persons With AIDS funds are consistent with the strategic plan in the State's consolidated plan.

Section 3 -- It will comply with section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701a) and implementing regulations at 24 CFR Part 75.



Signature of Authorized Official

July 29, 2025

Date

Executive Director, IHDA

Title

Specific Community Development Block Grant Certifications

The State certifies that:

Citizen Participation -- It is following a detailed citizen participation plan that satisfies the requirements of 24 CFR §91.115 and each unit of general local government that receives assistance from the State is following a detailed citizen participation plan that satisfies the requirements of 24 CFR §570.486.

Consultation with Local Governments --

1. It has consulted with affected units of local government in the nonentitlement area of the State in determining the method of distribution of funding;
2. It engages in or will engage in planning for community development activities;
3. It provides or will provide technical assistance to units of local government in connection with community development programs; and
4. It will not refuse to distribute funds to any unit of general local government on the basis of the particular eligible activity selected by the unit of general local government to meet its community development needs, except that a State is not prevented from establishing priorities in distributing funding on the basis of the activities selected.

Local Needs Identification -- It will require each unit of general local government to be funded to identify its community development and housing needs, including the needs of low-income and moderate-income families, and the activities to be undertaken to meet these needs.

Community Development Plan -- Its consolidated plan identifies community development and housing needs and specifies both short-term and long-term community development objectives that have been developed in accordance with the primary objective of the CDBG program (i.e., the development of viable urban communities, by providing decent housing and expanding economic opportunities, primarily for persons of low and moderate income) and requirements of 24 CFR Parts 91 and 570.

Use of Funds -- It has complied with the following criteria:

1. Maximum Feasible Priority. With respect to activities expected to be assisted with CDBG funds, it has developed its Action Plan so as to give maximum feasible priority to activities which benefit low and moderate income families or aid in the prevention or elimination of slums or blight. The Action Plan may also include activities which the grantee certifies are designed to meet other community development needs having particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community, and other financial resources are not available.
2. Overall Benefit. In the aggregate, not less than 70 percent of the CDBG funds, including Section 108 guaranteed loans, received by the State during the following fiscal year(s) 2025, 2026, and 2027 [a period designated by the State of one, two, or three specific consecutive fiscal year(s)] will be used for activities that benefit persons of low and moderate income.

3. Special Assessments. It will not attempt to recover any capital costs of public improvements assisted with CDBG Funds, including Section 108 loan guaranteed funds, by assessing any amount against properties owned and occupied by persons of low and moderate income, including any fee charged or assessment made as a condition of obtaining access to such public improvements.

However, if CDBG funds are used to pay the proportion of a fee or assessment that relates to the capital costs of public improvements (assisted in part with CDBG funds) financed from other revenue sources, an assessment or charge may be made against the property with respect to the public improvements financed by a source other than CDBG funds.

In addition, in the case of properties owned and occupied by moderate-income (not low-income) families, an assessment or charge may be made against the property for public improvements financed by a source other than CDBG funds if the jurisdiction certifies that it lacks CDBG funds to cover the assessment.

Excessive Force -- It will require units of general local government that receive CDBG funds to certify that they have adopted and are enforcing:

1. A policy prohibiting the use of excessive force by law enforcement agencies within its jurisdiction against any individuals engaged in non-violent civil rights demonstrations; and
2. A policy of enforcing applicable State and local laws against physically barring entrance to or exit from a facility or location which is the subject of such non-violent civil rights demonstrations within its jurisdiction.

Compliance with Anti-discrimination laws -- The grant will be conducted and administered in conformity with title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d) and the Fair Housing Act (42 U.S.C. 3601-3619) and implementing regulations.

Compliance with Laws -- It will comply with applicable laws.



Signature of Authorized Official

July 29, 2025
Date

Executive Director, IHDA
Title

Specific HOME Certifications

The State certifies that:

Tenant Based Rental Assistance -- If it plans to use HOME funds for tenant-based rental assistance, tenant-based rental assistance is an essential element of the State's consolidated plan.

Eligible Activities and Costs -- It is using and will use HOME funds for eligible activities and costs, as described in 24 CFR §92.205 through §92.209 and that it is not using and will not use HOME funds for prohibited activities, as described in §92.214.

Subsidy Layering -- Before committing any funds to a project, the State or its recipients will evaluate the project in accordance with the guidelines that it adopts for this purpose and will not invest any more HOME funds in combination with other Federal assistance than is necessary to provide affordable housing.


Signature of Authorized Official

July 29, 2025
Date

Executive Director, IHDA
Title

Emergency Solutions Grant Certifications

Each State that seeks funding under the Emergency Solutions Grants Program must provide the following certifications:

Matching Funds – The State will obtain any matching amounts required under 24 CFR 576.201 in a manner so that its subrecipients that are least capable of providing matching amounts receive the benefit of the exception under 24 CFR 576.201(a)(2).

Discharge Policy – The State will establish and implement, to the maximum extent practicable and where appropriate, policies and protocols for the discharge of persons from publicly funded institutions or systems of care (such as health care facilities, mental health facilities, foster care or other youth facilities, or correction programs and institutions) in order to prevent this discharge from immediately resulting in homelessness for these persons.

Confidentiality – The State will develop and implement procedures to ensure the confidentiality of records pertaining to any individual provided family violence prevention or treatment services under any project assisted under the ESG program, including protection against the release of the address or location of any family violence shelter project, except with the written authorization of the person responsible for the operation of that shelter.

The State will ensure that its subrecipients comply with the following criteria:

Major rehabilitation/conversion/renovation – If an emergency shelter’s rehabilitation costs exceed 75 percent of the value of the building before rehabilitation, the building will be maintained as a shelter for homeless individuals and families for a minimum of 10 years after the date the building is first occupied by a homeless individual or family after the completed rehabilitation. If the cost to convert a building into an emergency shelter exceeds 75 percent of the value of the building after conversion, the building will be maintained as a shelter for homeless individuals and families for a minimum of 10 years after the date the building is first occupied by a homeless individual or family after the completed conversion. In all other cases where ESG funds are used for renovation, the building will be maintained as a shelter for homeless individuals and families for a minimum of 3 years after the date the building is first occupied by a homeless individual or family after the completed renovation.

Essential Services and Operating Costs – If ESG funds are used for shelter operations or essential services related to street outreach or emergency shelter, the subrecipient will provide services or shelter to homeless individuals and families for the period during which the ESG assistance is provided, without regard to a particular site or structure, so long the applicant serves the same type of persons (e.g., families with children, unaccompanied youth, veterans, disabled individuals, or victims of domestic violence) or persons in the same geographic area.

Renovation – Any renovation carried out with ESG assistance shall be sufficient to ensure that the building involved is safe and sanitary.

Supportive Services – The subrecipient will assist homeless individuals in obtaining permanent housing, appropriate supportive services (including medical and mental health treatment, counseling, supervision, and other services essential for achieving independent living), and other Federal, State, local, and private assistance available for such individuals.

Homeless Persons Involvement - To the maximum extent practicable, the subrecipient will involve, through employment, volunteer services, or otherwise, homeless individuals and families in constructing, renovating, maintaining, and operating facilities assisted under ESG, or providing services assisted under the ESG program, and in providing services for occupants of facilities assisted ESG.

Consolidated Plan - All activities the subrecipient undertakes with assistance under ESG are consistent with the State's current HUD-approved consolidated plan.



Signature of Authorized Official

July 29, 2025

Date

Executive Director, IHDA

Title

Housing Opportunities for Persons With AIDS Certifications

The State HOPWA grantee certifies that:

Activities -- Activities funded under the program will meet urgent needs that are not being met by available public and private sources.

Building -- Any building or structure assisted under the program shall be operated for the purpose specified in the consolidated plan:

1. For a period of not less than 10 years, in the case of any building or structure purchased, leased, rehabilitated, renovated, or converted with HOPWA assistance,
2. For a period of not less than 3 years, in the case of assistance involving non-substantial rehabilitation or repair of a building or structure.



Signature of Authorized Official

July 29, 2025
Date

Executive Director, IHDA
Title

APPENDIX TO CERTIFICATIONS

INSTRUCTIONS CONCERNING LOBBYING CERTIFICATION:

Lobbying Certification

This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

Application for Federal Assistance SF-424		
* 1. Type of Submission: <input type="checkbox"/> Preapplication <input checked="" type="checkbox"/> Application <input type="checkbox"/> Changed/Corrected Application	* 2. Type of Application: <input checked="" type="checkbox"/> New <input type="checkbox"/> Continuation <input type="checkbox"/> Revision	* If Revision, select appropriate letter(s): <input type="text"/> * Other (Specify): <input type="text"/>
* 3. Date Received: <input type="text" value="07/17/2025"/>	4. Applicant Identifier: <input type="text"/>	
5a. Federal Entity Identifier: <input type="text"/>	5b. Federal Award Identifier: <input type="text"/>	
State Use Only:		
6. Date Received by State: <input type="text"/>	7. State Application Identifier: <input type="text"/>	
8. APPLICANT INFORMATION:		
* a. Legal Name: <input type="text" value="State of Illinois"/>		
* b. Employer/Taxpayer Identification Number (EIN/TIN): <input type="text" value="16-2700001"/>	* c. UEI: <input type="text" value="G452W40480001"/>	
d. Address:		
* Street1: <input type="text" value="111 E. Wacker Drive"/>	Street2: <input type="text" value="Suite 1000"/>	
* City: <input type="text" value="Chicago"/>	County/Parish: <input type="text"/>	
* State: <input type="text" value="IL - Illinois"/>	Province: <input type="text"/>	
* Country: <input type="text" value="USA - UNITED STATES"/>	* Zip (Postal Code): <input type="text" value="60601-4706"/>	
e. Organizational Unit:		
Department Name: <input type="text" value="IL Housing Development Authority"/>	Division Name: <input type="text" value="Multi-Family Financing"/>	
f. Name and contact information of person to be contacted on matters involving this application:		
Prefix: <input type="text" value=""/>	* First Name: <input type="text" value="Christine"/>	Middle Name: <input type="text"/>
* Last Name: <input type="text" value="Brown"/>	Suffix: <input type="text"/>	
Title: <input type="text" value="Manager, Director, Multi-Family Financing"/>		
Organizational Address: <input type="text" value="Illinois Housing Development Authority"/>		
* Telephone Number: <input type="text" value="312-834-8711"/>	Fax Number: <input type="text" value="312-834-3261"/>	
* Email: <input type="text" value="christabrown@ihda.org"/>		

Application for Federal Assistance SF-424	
<p>* 9. Type of Applicant 1: Select Applicant Type:</p> <input type="text" value="A. State Government"/>	
<p>Type of Applicant 2: Select Applicant Type:</p> <input type="text"/>	
<p>Type of Applicant 3: Select Applicant Type:</p> <input type="text"/>	
<p>* Other (specify):</p> <input type="text"/>	
<p>* 10. Name of Federal Agency:</p> <input type="text" value="U.S. Department of Housing and Urban Development"/>	
<p>11. Assistance Listing Number:</p> <input type="text" value="14-0019"/>	
<p>Assistance Listing Title:</p> <input type="text" value="HOME Investment Partnerships Program"/>	
<p>* 12. Funding Opportunity Number:</p> <input type="text" value="Not Applicable"/>	
<p>* Title:</p> <input type="text" value="Not Applicable; The HOME Program is a Federal Grant Program."/>	
<p>13. Competition Identification Number:</p> <input type="text" value="Not Applicable"/>	
<p>Title:</p> <input type="text" value="Not Applicable; The HOME Program is a Federal Grant Program."/>	
<p>14. Areas Affected by Project (Cities, Counties, States, etc.):</p> <input type="text"/> <div style="display: flex; justify-content: space-around; margin-top: 5px;"> <input type="button" value="Add Attachment"/> <input type="button" value="Clear Attachment"/> <input type="button" value="View Attachments"/> </div>	
<p>* 15. Descriptive Title of Applicant's Project:</p> <input type="text" value="The 2021 HOME Program is designed to encourage public agencies, non-for-profit entities to apply for HOME funds through IRIS in order to expand the supply of decent, safe, affordable housing."/>	
<p>Attach supporting documents as specified in agency instructions:</p> <div style="display: flex; justify-content: space-around; margin-top: 5px;"> <input type="button" value="Add Attachments"/> <input type="button" value="Download Attachments"/> <input type="button" value="View Attachments"/> </div>	

Application for Federal Assistance SF-424	
16. Congressional Districts Of:	
* a. Applicant: <input type="text" value="ALL"/>	* b. Program/Project: <input type="text" value="TOD"/>
Attach an additional list of Program/Project Congressional Districts if needed: <input type="text"/> <input type="button" value="Add Attachment"/> <input type="button" value="Create Attachment"/> <input type="button" value="Add Attachment"/>	
17. Proposed Project:	
* a. Start Date: <input type="text" value="01/01/2024"/>	* b. End Date: <input type="text" value="12/31/2025"/>
18. Estimated Funding (\$):	
* a. Federal:	<input type="text" value="15,406,837.34"/>
* b. Applicant:	<input type="text"/>
* c. State:	<input type="text"/>
* d. Local:	<input type="text"/>
* e. Other:	<input type="text"/>
* f. Program Income:	<input type="text" value="15,406,837.34"/>
* g. TOTAL:	<input type="text" value="30,813,674.68"/>
* 19. Is Application Subject to Review By State Under Executive Order 12372 Process?	
<input type="checkbox"/> a. This application was made available to the State under the Executive Order 12372 Process for review on <input type="text"/> <input type="checkbox"/> b. Program is subject to E.O. 12372 but has not been selected by the State for review. <input checked="" type="checkbox"/> c. Program is not covered by E.O. 12372.	
* 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)	
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If "Yes", provide explanation and attach <input type="text"/> <input type="button" value="Add Attachment"/> <input type="button" value="Create Attachment"/> <input type="button" value="Add Attachment"/>	
21. *By signing this application, I certify (1) to the statements contained in the list of certifications** and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 18, Section 1001) <input checked="" type="checkbox"/> ** I AGREE <small>** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.</small>	
Authorized Representative:	
Prefix: <input type="text" value="Mr."/>	* First Name: <input type="text" value="ERICSON"/>
Middle Name: <input type="text"/>	
* Last Name: <input type="text" value="Bauer"/>	
Suffix: <input type="text"/>	
* Title: <input type="text" value="Executive Director, Ill. Red Development, WIth."/>	
* Telephone Number: <input type="text" value="618-616-0018"/>	Fax Number: <input type="text" value="618-616-0018"/>
* Email: <input type="text" value="ericson@irda.org"/>	
* Signature of Authorized Representative: 	* Date Signed: <input type="text" value="07/29/2025"/>

Instructions for the HUD 424-B Assurances and Certifications

As part of your application for HUD funding, you, as the official authorized to sign on behalf of your organization or as an individual, must provide the following assurances and certifications. The Responsible Civil Rights Official has specified this form for use for purposes of general compliance with 24 CFR §§ 1.5, 3.115, 8.50, and 146.25, as applicable. The Responsible Civil Rights Official may require specific civil rights assurances to be furnished consistent with those authorities and will specify the form on which such assurances must be made. A failure to furnish or comply with the civil rights assurances contained in this form may result in the procedures to effect compliance at 24 CFR §§ 1.8, 3.115, 8.57, or 146.39.

By submitting this form, you are stating that all assertions made in this form are true, accurate, and correct.

As the duly representative of the applicant, I certify that the applicant (insert below the Name and title of the Authorized Representative, name of Organization and the date of signature):

*Authorized Representative Name:

Kristin Faust

*Title: *Executive Director*

*Applicant/Recipient Organization:

Illinois Housing Development Authority

I. Have the legal authority to apply for Federal assistance, has the institutional, managerial and financial capability (including funds to pay the non-Federal share of program costs) to plan, manage and complete the program as described in the application and the governing body has duly authorized the submission of the application, including these assurances and certifications, and authorized me as the official representative of the application to act in connection with the application and to provide any additional information as may be required.

2. Will administer the grant in compliance with Title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000(d)) and implementing regulations (24 CFR part 1), which provide that no person in the United States shall, on the grounds of race, color or national origin, be excluded from participation in, be denied the benefits of, or otherwise be subject to discrimination under any program or activity that receives Federal financial assistance OR if the applicant is a Federally recognized Indian tribe or its tribally designated housing entity, is subject to the Indian Civil Rights Act (25 U.S.C. 1301-1303).

3. Will administer the grant in compliance with Section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 794), as amended, and implementing regulations at 24 CFR part 8, the American Disabilities Act (42 U.S.C. §§ 12101 et seq.) and implementing regulations at 28 CFR part 35 or 36, as applicable, and the Age Discrimination Act of 1975 (42 U.S.C. 6101-07) as amended, and implementing regulations at 24 CFR part 146 which together provide that no person in the United States shall, on the grounds of disability or age, be excluded from participation in, be denied the benefits of, or otherwise be subjected to discrimination under any program or activity that receives Federal financial assistance; except if the grant program authorizes or limits participation to designated populations, then the applicant will comply with the nondiscrimination requirements within the designated population.

4. Will comply with the Fair Housing Act (42 U.S.C. 3601-19) as amended, and the implementing regulations at 24 CFR part 100, which prohibit discrimination in housing on the basis of race, color, religion, sex, disability, familial status, or national origin and will affirmatively further fair housing; except an applicant which is an Indian tribe or its instrumentality which is excluded by statute from coverage does not make this certification; and further except if the grant program authorizes or limits participation to designated populations, then the applicant

will comply with the nondiscrimination requirements within the designated population.

5. Will comply with all applicable Federal nondiscrimination requirements, including those listed at 24 CFR §§ 5.105(a) and 5.106 as applicable.

6. Will not use Federal funding to promote diversity, equity, and inclusion (DEI) mandates, policies, programs, or activities that violate any applicable Federal anti-discrimination laws.

7. Will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended (42 U.S.C. 4601) and implementing regulations at 49 CFR part 24 and, as applicable, Section 108(d) of the Housing and Community Development Act of 1974 (42 U.S.C. 5304(d)) and implementing regulations at 24 CFR part 42, subpart A.

8. Will comply with the environmental requirements of the National Environmental Policy Act (42 U.S.C. 4321 et seq.) and related Federal authorities prior to the commitment or expenditure of funds for property.

9. That no Federal appropriated funds have been paid, or will be paid, by or on behalf of the applicant, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, and officer or employee of Congress, or an employee of a Member of Congress, in connection with the awarding of this Federal grant or its extension, renewal, amendment or modification, if funds other than Federal appropriated funds have or will be paid for influencing or attempting to influence the persons listed above, I shall complete and submit Standard Form LLL, Disclosure Form to Report Lobbying. I certify that I shall require all subawards at all tiers (including sub-grants and contracts) to similarly certify and disclose accordingly. Federally recognized Indian Tribes and tribally designated housing entities (TDHEs) established by Federally-recognized Indian tribes as a result of the exercise of the tribe's sovereign power are excluded from coverage by the Byrd Amendment, but State-recognized Indian tribes and TDHEs established under State law are not excluded from the statute's coverage.

I/We, the undersigned, certify under penalty of perjury that the information provided above is true, accurate, and correct. **WARNING: Anyone who knowingly submits a false claim or makes a false statement is subject to criminal and/or civil penalties, including confinement for up to 5 years, fines, and civil and administrative penalties.** (18 U.S.C. §§287, 1001, 1010, 1012, 1014; 31 U.S.C. §3729, 3802; 24 CFR §28.10(b)(1)(iii))

* Signature:

* Date: (mm/dd/yyyy) 07/29/2025

Public Reporting Burden Statement: The public reporting burden for this collection of information is estimated to average 0.5 hours per response, including the time for reviewing instructions, searching existing data sources, gathering, and maintaining the data needed, and completing and reviewing the collection of information. Comments regarding the accuracy of this burden estimate and any suggestions for reducing this burden can be sent to: U.S. Department of Housing and Urban Development, Office of the Chief Data Officer, R, 451 7th St SW, Room 4176, Washington, DC 20410-5000. **Do not send completed HUD 424-B forms to this address.** This agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless the collection displays a valid OMB control number. The Department of Housing and Urban Development is authorized to collect this information under the authority cited in the Notice of Funding Opportunity for this grant program. The information collected provides assurances and certifications for legal requirements related to the administration of this grant program. HUD will use this information to ensure compliance of its grantees. This information is required to obtain the benefit sought in the grant program. This information will not be held confidential and may be made available to the public in accordance with the Freedom of Information Act (5 U.S.C. §552).

Form HUD 424-B (1/27/2023)

Application for Federal Assistance SF-424		
* 1. Type of Submission: <input type="checkbox"/> Preapplication <input checked="" type="checkbox"/> Application <input type="checkbox"/> Changed/Corrected Application	* 2. Type of Application: <input checked="" type="checkbox"/> New <input type="checkbox"/> Continuation <input type="checkbox"/> Revision	* If Revision, select appropriate letter(s): <input type="text"/> * Other (Specify): <input type="text"/>
* 3. Date Received: <input type="text" value="07/17/2025"/>	4. Applicant Identifier: <input type="text"/>	
5a. Federal Entity Identifier: <input type="text"/>	5b. Federal Award Identifier: <input type="text"/>	
State Use Only:		
6. Date Received by State: <input type="text"/>	7. State Application Identifier: <input type="text"/>	
8. APPLICANT INFORMATION:		
* a. Legal Name: <input type="text" value="State of Illinois"/>		
* b. Employer/Taxpayer Identification Number (EIN/TIN): <input type="text" value="16-2108817"/>	* c. UEI: <input type="text" value="GABAW0088063"/>	
d. Address:		
* Street1: <input type="text" value="111 E. Wacker Drive"/>	Street2: <input type="text" value="Suite 1000"/>	
* City: <input type="text" value="Chicago"/>	County/Parish: <input type="text"/>	
* State: <input type="text" value="IL - Illinois"/>	Province: <input type="text"/>	
* Country: <input type="text" value="USA UNITED STATES"/>	* Zip (Postal Code): <input type="text" value="60601-4706"/>	
e. Organizational Unit:		
Department Name: <input type="text" value="IL Housing Development Authority"/>	Division Name: <input type="text" value="Multi-Family Financing"/>	
f. Name and contact information of person to be contacted on matters involving this application:		
Prefix: <input type="text" value="Mr."/>	* First Name: <input type="text" value="Charles"/>	Middle Name: <input type="text"/>
* Last Name: <input type="text" value="Brown"/>	Suffix: <input type="text"/>	
Title: <input type="text" value="Managing Director, Multi-Family Financing"/>		
Organizational Address: <input type="text" value="Illinois Housing Development Authority"/>		
* Telephone Number: <input type="text" value="312-834-8771"/>	Fax Number: <input type="text" value="312-834-3267"/>	
* Email: <input type="text" value="charles@ihda.org"/>		

Application for Federal Assistance SF-424	
<p>* 9. Type of Applicant 1: Select Applicant Type:</p> <input type="text" value="A1 State Government"/>	
<p>Type of Applicant 2: Select Applicant Type</p> <input type="text"/>	
<p>Type of Applicant 3: Select Applicant Type:</p> <input type="text"/>	
<p>* Other (specify)</p> <input type="text"/>	
<p>* 10. Name of Federal Agency:</p> <input type="text" value="U.S. Department of Housing and Urban Development"/>	
<p>11. Assistance Listing Number:</p> <input type="text" value="106-0005"/>	
<p>Assistance Listing Title:</p> <input type="text" value="Revolving Trust Fund"/>	
<p>* 12. Funding Opportunity Number:</p> <input type="text" value="Not Applicable"/>	
<p>* Title:</p> <input type="text" value="Not Applicable; The Housing Trust Fund is a formula grant program."/>	
<p>13. Competition Identification Number:</p> <input type="text" value="Not Applicable"/>	
<p>Title:</p> <input type="text" value="Not Applicable; The Housing Trust Fund is a formula grant program."/>	
<p>14. Areas Affected by Project (Cities, Counties, States, etc.):</p> <input type="text"/> <div style="display: flex; justify-content: space-around; margin-top: 5px;"> <input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="Copy Attachment"/> </div>	
<p>* 15. Descriptive Title of Applicant's Project:</p> <input type="text" value="The 2023 year of Illinois Housing Trust Fund Program expands and preserves the supply of affordable housing, particularly rental housing, for extremely low-income households."/>	
<p>Attach supporting documents as specified in agency instructions:</p> <div style="display: flex; justify-content: space-around; margin-top: 5px;"> <input type="button" value="Add Attachments"/> <input type="button" value="Delete Attachment"/> <input type="button" value="Copy Attachment"/> </div>	

Application for Federal Assistance SF-424	
16. Congressional Districts Of:	
* a. Applicant: <input type="text" value="A.L."/>	* b. Program/Project: <input type="text" value="TSD"/>
Attach an additional list of Program/Project Congressional Districts if needed	
<input type="text"/>	<input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="Add Attachment"/>
17. Proposed Project:	
* a. Start Date: <input type="text" value="01/01/2024"/>	* b. End Date: <input type="text" value="12/31/2025"/>
18. Estimated Funding (\$):	
* a. Federal:	<input type="text" value="6,224,452.74"/>
* b. Applicant:	<input type="text" value=""/>
* c. State:	<input type="text" value=""/>
* d. Local:	<input type="text" value=""/>
* e. Other:	<input type="text" value=""/>
* f. Program Income:	<input type="text" value=""/>
* g. TOTAL:	<input type="text" value="6,224,452.74"/>
* 19. Is Application Subject to Review By State Under Executive Order 12372 Process?	
<input type="checkbox"/> a. This application was made available to the State under the Executive Order 12372 Process for review on <input type="text"/>	
<input type="checkbox"/> b. Program is subject to E.O. 12372 but has not been selected by the State for review.	
<input checked="" type="checkbox"/> c. Program is not covered by E.O. 12372.	
* 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)	
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
If "Yes," provide explanation and attach <input type="text"/>	
<input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="Add Attachment"/>	
21. *By signing this application, I certify (1) to the statements contained in the list of certifications** and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 18, Section 1001)	
<input checked="" type="checkbox"/> ** I AGREE	
<small>** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.</small>	
Authorized Representative:	
Prefix: <input type="text" value="Mr."/>	* First Name: <input type="text" value="FRANCIS"/>
Middle Name: <input type="text"/>	
* Last Name: <input type="text" value="Bauer"/>	
Suffix: <input type="text"/>	
* Title: <input type="text" value="Executive Director, Civ. Rights Enforcement AGED"/>	
* Telephone Number: <input type="text" value="413-816-0319"/>	Fax Number: <input type="text" value="413-816-0370"/>
* Email: <input type="text" value="frbauer@hrda.org"/>	
* Signature of Authorized Representative: 	* Date Signed: <input type="text" value="07/29/2025"/>

Instructions for the HUD 424-B Assurances and Certifications

As part of your application for HUD funding, you, as the official authorized to sign on behalf of your organization or as an individual, must provide the following assurances and certifications. The Responsible Civil Rights Official has specified this form for use for purposes of general compliance with 24 CFR §§ 1.5, 3.115, 8.50, and 146.25, as applicable. The Responsible Civil Rights Official may require specific civil rights assurances to be furnished consistent with those authorities and will specify the form on which such assurances must be made. A failure to furnish or comply with the civil rights assurances contained in this form may result in the procedures to effect compliance at 24 CFR §§ 1.8, 3.115, 8.57, or 146.39.

By submitting this form, you are stating that all assertions made in this form are true, accurate, and correct.

As the duly representative of the applicant, I certify that the applicant (insert below the Name and title of the Authorized Representative, name of Organization and the date of signature):

*Authorized Representative Name:
Krisia Faust
*Title: Executive Director
*Applicant/Recipient Organization:
Haze Housing Development Authority

1. Has the legal authority to apply for Federal assistance, has the institutional, managerial and financial capability (including funds to pay the non-Federal share of program costs) to plan, manage and complete the program as described in the application and the governing body has duly authorized the submission of the application, including these assurances and certifications, and authorized me as the official representative of the application to act in connection with the application and to provide any additional information as may be required.

2. Will administer the grant in compliance with Title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000(d)) and implementing regulations (24 CFR part 1), which provide that no person in the United States shall, on the grounds of race, color or national origin, be excluded from participation in, be denied the benefits of, or otherwise be subject to discrimination under any program or activity that receives Federal financial assistance OR if the applicant is a Federally recognized Indian tribe or its tribally designated housing entity, is subject to the Indian Civil Rights Act (25 U.S.C. 1301-1303).

3. Will administer the grant in compliance with Section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 794), as amended, and implementing regulations at 24 CFR part 8, the American Disabilities Act (42 U.S.C. §§ 12101 et seq.) and implementing regulations at 28 CFR part 35 or 36, as applicable, and the Age Discrimination Act of 1975 (42 U.S.C. 6101-07) as amended, and implementing regulations at 24 CFR part 146 which together provide that no person in the United States shall, on the grounds of disability or age, be excluded from participation in, be denied the benefits of, or otherwise be subjected to discrimination under any program or activity that receives Federal financial assistance; except if the grant program authorizes or limits participation to designated populations, then the applicant will comply with the nondiscrimination requirements within the designated population.

4. Will comply with the Fair Housing Act (42 U.S.C. 3601-19) as amended, and the implementing regulations at 24 CFR part 100, which prohibit discrimination in housing on the basis of race, color, religion, sex, disability, familial status, or national origin and will affirmatively further fair housing; except an applicant which is an Indian tribe or its instrumentality which is excluded by statute from coverage does not make this certification; and further except if the grant program authorizes or limits participation to designated populations, then the applicant

will comply with the nondiscrimination requirements within the designated population.

5. Will comply with all applicable Federal nondiscrimination requirements, including those listed at 24 CFR §§ 5.105(a) and 5.106 as applicable.

6. Will not use Federal funding to promote diversity, equity, and inclusion (DEI) mandates, policies, programs, or activities that violate any applicable Federal anti-discrimination laws.

7. Will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended (42 U.S.C. 4601) and implementing regulations at 49 CFR part 24 and, as applicable, Section 108(d) of the Housing and Community Development Act of 1974 (42 U.S.C. 5304(d)) and implementing regulations at 24 CFR part 42, subpart A.

8. Will comply with the environmental requirements of the National Environmental Policy Act (42 U.S.C. 4321 et seq.) and related Federal authorities prior to the commitment or expenditure of funds for property.

9. That no Federal appropriated funds have been paid, or will be paid, by or on behalf of the applicant, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, and officer or employee of Congress, or an employee of a Member of Congress, in connection with the awarding of this Federal grant or its extension, renewal, amendment or modification, if funds other than Federal appropriated funds have or will be paid for influencing or attempting to influence the persons listed above, I shall complete and submit Standard Form LLL, Disclosure Form to Report Lobbying. I certify that I shall require all subawards at all tiers (including sub-grants and contracts) to similarly certify and disclose accordingly. Federally recognized Indian Tribes and tribally designated housing entities (TDHEs) established by Federally-recognized Indian tribes as a result of the exercise of the tribe's sovereign power are excluded from coverage by the Byrd Amendment, but State-recognized Indian tribes and TDHEs established under State law are not excluded from the statute's coverage.

I/We, the undersigned, certify under penalty of perjury that the information provided above is true, accurate, and correct. **WARNING: Anyone who knowingly submits a false claim or makes a false statement is subject to criminal and/or civil penalties, including confinement for up to 5 years, fines, and civil and administrative penalties.** (18 U.S.C. §§287, 1001, 1010, 1012, 1014; 31 U.S.C. §3729, 3802; 24 CFR §28.10(b)(1)(iii))

* Signature: 

* Date: (mm/dd/yyyy) 07/29/2025

Public Reporting Burden Statement: The public reporting burden for this collection of information is estimated to average 0.5 hours per response, including the time for reviewing instructions, searching existing data sources, gathering, and maintaining the data needed, and completing and reviewing the collection of information. Comments regarding the accuracy of this burden estimate and any suggestions for reducing this burden can be sent to: U.S. Department of Housing and Urban Development, Office of the Chief Data Officer, R, 451 7th St SW, Room 4176, Washington, DC 20410-5000. **Do not send completed HUD 424-B forms to this address.** This agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless the collection displays a valid OMB control number. The Department of Housing and Urban Development is authorized to collect this information under the authority cited in the Notice of Funding Opportunity for this grant program. The information collected provides assurances and certifications for legal requirements related to the administration of this grant program. HUD will use this information to ensure compliance of its grantees. This information is required to obtain the benefit sought in the grant program. This information will not be held confidential and may be made available to the public in accordance with the Freedom of Information Act (5 U.S.C. §552).

Form HUD 424-B (1/27/2023)

Application for Federal Assistance SF-424		
* 1. Type of Submission: <input type="checkbox"/> Preapplication <input checked="" type="checkbox"/> Application <input type="checkbox"/> Changed/Corrected Application	* 2. Type of Application: <input checked="" type="checkbox"/> New <input type="checkbox"/> Continuation <input type="checkbox"/> Revision	* If Revision, select appropriate letter(s): <input type="text"/> * Other (Specify): <input type="text"/>
* 3. Date Received: 07/17/2025	4. Applicant Identifier: <input type="text"/>	
5a. Federal Entity Identifier: <input type="text"/>	5b. Federal Award Identifier: <input type="text"/>	
State Use Only:		
6. Date Received by State: <input type="text"/>	7. State Application Identifier: <input type="text"/>	
8. APPLICANT INFORMATION:		
* a. Legal Name: State of Illinois		
* b. Employer/Taxpayer Identification Number (EIN/TIN): 37-550119	* c. UEI: B14060780004	
d. Address:		
* Street: 1011 South 2nd Street	Street2: <input type="text"/>	
* City: Springfield	County/Parish: <input type="text"/>	
* State: IL - Illinois	Province: <input type="text"/>	
* Country: USA UNITED STATES	* Zip (Postal Code): 62704-3004	
e. Organizational Unit:		
Department Name: IL Commerce & Economic Opport.	Division Name: Community Development	
f. Name and contact information of person to be contacted on matters involving this application:		
Prefix: Dr.	* First Name: Wendy	Middle Name: <input type="text"/>
* Last Name: Bell	Suffix: <input type="text"/>	
Title: Deputy Director, Div. of Community Development		
Organizational Address: Illinois Department of Commerce and Economic Opportunity		
* Telephone Number: 217-558-4200	* Fax Number: 217-558-2181	
* Email: wendy-bell@illinois.gov		

Application for Federal Assistance SF-424	
<p>* 9. Type of Applicant 1: Select Applicant Type:</p> <input type="text" value="A) State Government"/> <p>Type of Applicant 2: Select Applicant Type:</p> <input type="text"/> <p>Type of Applicant 3: Select Applicant Type:</p> <input type="text"/> <p>* Other (specify):</p> <input type="text"/>	
<p>* 10. Name of Federal Agency:</p> <input type="text" value="U.S. Department of Housing and Urban Development"/>	
<p>11. Assistance Listing Number:</p> <input type="text" value="14--220"/> <p>Assistance Listing Title:</p> <input type="text" value="The Community Development Block Grant Program"/>	
<p>* 12. Funding Opportunity Number:</p> <input type="text" value="Not applicable"/> <p>* Title:</p> <input type="text" value="Not Applicable; The CDBG Program is a Formula Grant Program"/>	
<p>13. Competition Identification Number:</p> <input type="text" value="Not Applicable"/> <p>Title:</p> <input type="text" value="Not Applicable; The CDBG Program is a Formula Grant Program"/>	
<p>14. Areas Affected by Project (Cities, Counties, States, etc.):</p> <input type="text"/> <div style="display: flex; justify-content: space-around;"> <input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachments"/> </div>	
<p>* 15. Descriptive Title of Applicant's Project:</p> <input type="text" value="Submittal of Final Statement related to the Solicitation of FY 2023 Allocation of the State of Illinois Community Development Block Grant Funds"/>	
<p>Attach supporting documents as specified in agency instructions.</p> <div style="display: flex; justify-content: space-around;"> <input type="button" value="Add Attachments"/> <input type="button" value="Delete Attachments"/> <input type="button" value="View Attachments"/> </div>	

Application for Federal Assistance SF-424	
16. Congressional Districts Of:	
* a. Applicant: <input type="text" value="A.L."/>	* b. Program/Project: <input type="text" value="TOD"/>
Attach an additional list of Program/Project Congressional Districts if needed.	
<input type="text"/>	<input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="Add Attachment"/>
17. Proposed Project:	
* a. Start Date: <input type="text" value="01/01/2024"/>	* b. End Date: <input type="text" value="12/31/2025"/>
18. Estimated Funding (\$):	
* a. Federal:	<input type="text" value="28,458,112.00"/>
* b. Applicant:	<input type="text" value=""/>
* c. State:	<input type="text" value=""/>
* d. Local:	<input type="text" value=""/>
* e. Other:	<input type="text" value=""/>
* f. Program Income:	<input type="text" value=""/>
* g. TOTAL:	<input type="text" value="28,458,112.00"/>
* 19. Is Application Subject to Review By State Under Executive Order 12372 Process?	
<input type="checkbox"/> a. This application was made available to the State under the Executive Order 12372 Process for review on <input type="text"/>	
<input type="checkbox"/> b. Program is subject to E.O. 12372 but has not been selected by the State for review.	
<input checked="" type="checkbox"/> c. Program is not covered by E.O. 12372.	
* 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)	
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
If "Yes," provide explanation and attach <input type="text"/>	
<input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="Add Attachment"/>	
21. *By signing this application, I certify (1) to the statements contained in the list of certifications** and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 18, Section 1001)	
<input checked="" type="checkbox"/> ** I AGREE	
<small>** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.</small>	
Authorized Representative:	
Prefix: <input type="text" value="Mr."/>	* First Name: <input type="text" value="FRANCIS"/>
Middle Name: <input type="text"/>	
* Last Name: <input type="text" value="Bauer"/>	
Suffix: <input type="text"/>	
* Title: <input type="text" value="Executive Director, The Housing Trust, Inc."/>	
* Telephone Number: <input type="text" value="413-816-0318"/>	Fax Number: <input type="text" value="413-816-0317"/>
* Email: <input type="text" value="frbauer@htrd.org"/>	
* Signature of Authorized Representative: 	* Date Signed: <input type="text" value="07/29/2025"/>

Instructions for the HUD 424-B Assurances and Certifications

As part of your application for HUD funding, you, as the official authorized to sign on behalf of your organization or as an individual, must provide the following assurances and certifications. The Responsible Civil Rights Official has specified this form for use for purposes of general compliance with 24 CFR §§ 1.5, 3.115, 8.50, and 146.25, as applicable. The Responsible Civil Rights Official may require specific civil rights assurances to be furnished consistent with those authorities and will specify the form on which such assurances must be made. A failure to furnish or comply with the civil rights assurances contained in this form may result in the procedures to effect compliance at 24 CFR §§ 1.8, 3.115, 8.57, or 146.39.

By submitting this form, you are stating that all assertions made in this form are true, accurate, and correct.

As the duly representative of the applicant, I certify that the applicant: [Insert below the Name and title of the Authorized Representative, name of Organization and the date of signature]:

*Authorized Representative Name:

Kristin Richards

*Title: Director

*Applicant/Recipient Organization:

Illinois Department of Commerce and Economic Opportunity

1. Has the legal authority to apply for Federal assistance, has the institutional, managerial and financial capability (including funds to pay the non-Federal share of program costs) to plan, manage and complete the program as described in the application and the governing body has duly authorized the submission of the application, including these assurances and certifications, and authorized me as the official representative of the application to act in connection with the application and to provide any additional information as may be required.

2. Will administer the grant in compliance with Title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000(d)) and implementing regulations (24 CFR part 1), which provide that no person in the United States shall, on the grounds of race, color or national origin, be excluded from participation in, be denied the benefits of, or otherwise be subject to discrimination under any program or activity that receives Federal financial assistance OR if the applicant is a Federally recognized Indian tribe or its tribally designated housing entity, is subject to the Indian Civil Rights Act (25 U.S.C. 1301-1303).

3. Will administer the grant in compliance with Section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 794), as amended, and implementing regulations at 24 CFR part 8, the American Disabilities Act (42 U.S.C. §§ 12101 et seq.), and implementing regulations at 28 CFR part 35 or 36, as applicable, and the Age Discrimination Act of 1975 (42 U.S.C. 6101-07) as amended, and implementing regulations at 24 CFR part 146 which together provide that no person in the United States shall, on the grounds of disability or age, be excluded from participation in, be denied the benefits of, or otherwise be subjected to discrimination under any program or activity that receives Federal financial assistance; except if the grant program authorizes or limits participation to designated populations, then the applicant will comply with the nondiscrimination requirements within the designated population.

4. Will comply with the Fair Housing Act (42 U.S.C. 3601-19), as amended, and the implementing regulations at 24 CFR part 100, which prohibit discrimination in housing on the basis of race, color, religion, sex, disability, familial status, or national origin and will affirmatively further fair housing; except an applicant which is an Indian tribe or its instrumentality which is excluded by statute from coverage does not make this certification; and further except if the grant program authorizes or limits participation to designated populations, then the applicant

will comply with the nondiscrimination requirements within the designated population.

5. Will comply with all applicable Federal nondiscrimination requirements, including those listed at 24 CFR §§ 5.105(a) and 5.106 as applicable.

6. Will not use Federal funding to promote diversity, equity, and inclusion (DEI) mandates, policies, programs, or activities that violate any applicable Federal anti-discrimination laws.

7. Will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended (42 U.S.C. 4601) and implementing regulations at 49 CFR part 24 and, as applicable, Section 104(d) of the Housing and Community Development Act of 1974 (42 U.S.C. 5304(d)) and implementing regulations at 24 CFR part 42, subpart A.

8. Will comply with the environmental requirements of the National Environmental Policy Act (42 U.S.C. 4321 et seq.) and related Federal authorities prior to the commitment or expenditure of funds for property.

9. That no Federal appropriated funds have been paid, or will be paid, by or on behalf of the applicant, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, and officer or employee of Congress, or an employee of a Member of Congress, in connection with the awarding of this Federal grant or its extension, renewal, amendment or modification. If funds other than Federal appropriated funds have or will be paid for influencing or attempting to influence the persons listed above, I shall complete and submit Standard Form-LLL, Disclosure Form to Report Lobbying. I certify that I shall require all subawards at all tiers (including sub-grants and contracts) to similarly certify and disclose accordingly. Federally recognized Indian Tribes and tribally designated housing entities (TDHEs) established by Federally-recognized Indian tribes as a result of the exercise of the tribe's sovereign power are excluded from coverage by the Byrd Amendment, but State-recognized Indian tribes and TDHEs established under State law are not excluded from the statute's coverage.

I/We, the undersigned, certify under penalty of perjury that the information provided above is true, accurate, and correct. WARNING: Anyone who knowingly submits a false claim or makes a false statement is subject to criminal and/or civil penalties, including confinement for up to 5 years, fines, and civil and administrative penalties. (18 U.S.C. §§287, 1001, 1010, 1012, 1014; 31 U.S.C. §3729, 3802; 24 CFR §28.10(b)(1)(iii)).

* Signature:

Kristin Richards

Digitally signed by Kristin Richards
Date: 2025.07.08 12:06:42 -05'00'

* Date: (mm/dd/yyyy): 07/08/2025

Public Reporting Burden Statement: The public reporting burden for this collection of information is estimated to average 0.5 hours per response, including the time for reviewing instructions, searching existing data sources, gathering, and maintaining the data needed, and completing and reviewing the collection of information. Comments regarding the accuracy of this burden estimate and any suggestions for reducing this burden can be sent to: U.S. Department of Housing and Urban Development, Office of the Chief Data Officer, R, 451 7th St SW, Room 4176, Washington, DC 20410-5000. **Do not send completed HUD 424-B forms to this address.** This agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless the collection displays a valid OMB control number. The Department of Housing and Urban Development is authorized to collect this information under the authority cited in the Notice of Funding Opportunity for this grant program. The information collected provides assurances and certifications for legal requirements related to the administration of this grant program. HUD will use this information to ensure compliance of its grantees. This information is required to obtain the benefit sought in the grant program. This information will not be held confidential and may be made available to the public in accordance with the Freedom of Information Act (5 U.S.C. §552).

Form HUD 424-B (1/27/2023)

Application for Federal Assistance SF-424		
* 1. Type of Submission: <input type="checkbox"/> Preapplication <input checked="" type="checkbox"/> Application <input type="checkbox"/> Changed/Corrected Application	* 2. Type of Application: <input checked="" type="checkbox"/> New <input type="checkbox"/> Continuation <input type="checkbox"/> Revision	* If Revision, select appropriate letter(s): <input type="text"/> * Other (Specify): <input type="text"/>
* 3. Date Received: 07/17/2025	4. Applicant Identifier: <input type="text"/>	
5a. Federal Entity Identifier: <input type="text"/>	5b. Federal Award Identifier: <input type="text"/>	
State Use Only:		
6. Date Received by State: <input type="text"/>	7. State Application Identifier: <input type="text"/>	
8. APPLICANT INFORMATION:		
* a. Legal Name: State of Illinois		
* b. Employer/Taxpayer Identification Number (EIN/TIN): 16-4113561	* c. UEI: 8P784297824	
d. Address:		
* Street1: 823 East Monroe Street	<input type="text"/>	
Street2: <input type="text"/>	<input type="text"/>	
* City: Springfield	<input type="text"/>	
County/Parish: <input type="text"/>	<input type="text"/>	
* State: IL - Illinois	<input type="text"/>	
Province: <input type="text"/>	<input type="text"/>	
* Country: USA - UNITED STATES	<input type="text"/>	
* Zip (Postal Code): 62701-1915	<input type="text"/>	
e. Organizational Unit:		
Department Name: IL Dept. of Human Services	Division Name: Division, Community Services	
f. Name and contact information of person to be contacted on matters involving this application:		
Prefix: Mrs.	* First Name: Deborah	<input type="text"/>
Middle Name: <input type="text"/>	<input type="text"/>	
* Last Name: Smith	<input type="text"/>	
Suffix: <input type="text"/>	<input type="text"/>	
Title: Manager, Emergency Solutions Grants Program		
Organizational Address: Illinois Department of Human Services		
* Telephone Number: 217-325-6975	Fax Number: <input type="text"/>	
* Email: j6441yb.3d11a234116a1c.gov		

Application for Federal Assistance SF-424	
<p>* 9. Type of Applicant 1: Select Applicant Type:</p> <input type="text" value="A1 State Government"/>	
<p>Type of Applicant 2: Select Applicant Type:</p> <input type="text"/>	
<p>Type of Applicant 3: Select Applicant Type:</p> <input type="text"/>	
<p>* Other (specify):</p> <input type="text"/>	
<p>* 10. Name of Federal Agency:</p> <input type="text" value="U.S. Department of Housing and Urban Development"/>	
<p>11. Assistance Listing Number:</p> <input type="text" value="14--211"/>	
<p>Assistance Listing Title:</p> <input type="text" value="The Emergency Solutions Grants Program"/>	
<p>* 12. Funding Opportunity Number:</p> <input type="text" value="Not Applicable"/>	
<p>* Title:</p> <input type="text" value="Not Applicable; The ESG Program is a Formula Grant Program."/>	
<p>13. Competition Identification Number:</p> <input type="text" value="Not Applicable"/>	
<p>Title:</p> <input type="text" value="Not Applicable; The ESG Program is a Formula Grant Program."/>	
<p>14. Areas Affected by Project (Cities, Counties, States, etc.):</p> <input type="text"/> <div style="display: flex; justify-content: space-around; margin-top: 5px;"> <input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="Copy Attachment"/> </div>	
<p>* 15. Descriptive Title of Applicant's Project:</p> <input type="text" value="State of Illinois
M25 Emergency Solution Grants
Applications from State to address
Emergency Solutions Grants"/>	
<p>Attach supporting documents as specified in agency instructions.</p> <div style="display: flex; justify-content: space-around; margin-top: 5px;"> <input type="button" value="Add Attachments"/> <input type="button" value="Delete Attachment"/> <input type="button" value="Copy Attachment"/> </div>	

Application for Federal Assistance SF-424	
16. Congressional Districts Of:	
* a. Applicant: <input type="text" value="A.L."/>	* b. Program/Project: <input type="text" value="TSD"/>
Attach an additional list of Program/Project Congressional Districts if needed:	
<input type="text"/>	<input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="Add Attachment"/>
17. Proposed Project:	
* a. Start Date: <input type="text" value="01/01/2024"/>	* b. End Date: <input type="text" value="12/31/2025"/>
18. Estimated Funding (\$):	
* a. Federal:	<input type="text" value="5,290,081.00"/>
* b. Applicant:	<input type="text" value=""/>
* c. State:	<input type="text" value=""/>
* d. Local:	<input type="text" value=""/>
* e. Other:	<input type="text" value=""/>
* f. Program Income:	<input type="text" value=""/>
* g. TOTAL:	<input type="text" value="5,290,081.00"/>
* 19. Is Application Subject to Review By State Under Executive Order 12372 Process?	
<input type="checkbox"/> a. This application was made available to the State under the Executive Order 12372 Process for review on <input type="text"/>	
<input type="checkbox"/> b. Program is subject to E.O. 12372 but has not been selected by the State for review.	
<input checked="" type="checkbox"/> c. Program is not covered by E.O. 12372.	
* 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)	
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
If "Yes", provide explanation and attach:	
<input type="text"/>	<input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="Add Attachment"/>
21. *By signing this application, I certify (1) to the statements contained in the list of certifications** and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 18, Section 1001)	
<input checked="" type="checkbox"/> ** I AGREE	
** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.	
Authorized Representative:	
Prefix: <input type="text" value="Mr."/>	* First Name: <input type="text" value="FRANCIS"/>
Middle Name: <input type="text"/>	
* Last Name: <input type="text" value="Bauer"/>	
Suffix: <input type="text"/>	
* Title: <input type="text" value="Executive Director, IT Reg. Development Unit"/>	
* Telephone Number: <input type="text" value="413-816-0319"/>	Fax Number: <input type="text" value="413-816-0370"/>
* Email: <input type="text" value="frbauer@hhsa.org"/>	
* Signature of Authorized Representative: 	* Date Signed: <input type="text" value="07/29/2025"/>

Instructions for the HUD 424-B Assurances and Certifications

As part of your application for HUD funding, you, as the official authorized to sign on behalf of your organization or as an individual, must provide the following assurances and certifications. The Responsible Civil Rights Official has specified this form for use for purposes of general compliance with 24 CFR §§ 1.5, 3.115, 8.50, and 146.25, as applicable. The Responsible Civil Rights Official may require specific civil rights assurances to be furnished consistent with those authorities and will specify the form on which such assurances must be made. A failure to furnish or comply with the civil rights assurances contained in this form may result in the procedures to effect compliance at 24 CFR §§ 1.8, 3.115, 8.57, or 146.39.

By submitting this form, you are stating that all assertions made in this form are true, accurate, and correct.

As the duly representative of the applicant, I certify that the applicant: [Insert below the Name and title of the Authorized Representative, name of Organization and the date of signature]:

*Authorized Representative Name:

Dulce Quintero

*Title: Secretary

*Applicant/Recipient Organization:

Illinois Department of Human Services

1. Has the legal authority to apply for Federal assistance, has the institutional, managerial and financial capability (including funds to pay the non-Federal share of program costs) to plan, manage and complete the program as described in the application and the governing body has duly authorized the submission of the application, including these assurances and certifications, and authorized me as the official representative of the application to act in connection with the application and to provide any additional information as may be required.

2. Will administer the grant in compliance with Title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000(d)) and implementing regulations (24 CFR part 1), which provide that no person in the United States shall, on the grounds of race, color or national origin, be excluded from participation in, be denied the benefits of, or otherwise be subject to discrimination under any program or activity that receives Federal financial assistance OR if the applicant is a Federally recognized Indian tribe or its tribally designated housing entity, is subject to the Indian Civil Rights Act (25 U.S.C. 1301-1303).

3. Will administer the grant in compliance with Section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 794), as amended, and implementing regulations at 24 CFR part 8, the American Disabilities Act (42 U.S.C. §§ 12101 et seq.), and implementing regulations at 28 CFR part 35 or 36, as applicable, and the Age Discrimination Act of 1975 (42 U.S.C. 6101-07) as amended, and implementing regulations at 24 CFR part 146 which together provide that no person in the United States shall, on the grounds of disability or age, be excluded from participation in, be denied the benefits of, or otherwise be subjected to discrimination under any program or activity that receives Federal financial assistance; except if the grant program authorizes or limits participation to designated populations, then the applicant will comply with the nondiscrimination requirements within the designated population.

4. Will comply with the Fair Housing Act (42 U.S.C. 3601-19), as amended, and the implementing regulations at 24 CFR part 100, which prohibit discrimination in housing on the basis of race, color, religion, sex, disability, familial status, or national origin and will affirmatively further fair housing; except an applicant which is an Indian tribe or its instrumentality which is excluded by statute from coverage does not make this certification; and further except if the grant program authorizes or limits participation to designated populations, then the applicant

will comply with the nondiscrimination requirements within the designated population.

5. Will comply with all applicable Federal nondiscrimination requirements, including those listed at 24 CFR §§ 5.105(a) and 5.106 as applicable.

6. Will not use Federal funding to promote diversity, equity, and inclusion (DEI) mandates, policies, programs, or activities that violate any applicable Federal anti-discrimination laws.

7. Will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended (42 U.S.C. 4601) and implementing regulations at 49 CFR part 24 and, as applicable, Section 104(d) of the Housing and Community Development Act of 1974 (42 U.S.C. 5304(d)) and implementing regulations at 24 CFR part 42, subpart A.

8. Will comply with the environmental requirements of the National Environmental Policy Act (42 U.S.C. 4321 et seq.) and related Federal authorities prior to the commitment or expenditure of funds for property.

9. That no Federal appropriated funds have been paid, or will be paid, by or on behalf of the applicant, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, and officer or employee of Congress, or an employee of a Member of Congress, in connection with the awarding of this Federal grant or its extension, renewal, amendment or modification. If funds other than Federal appropriated funds have or will be paid for influencing or attempting to influence the persons listed above, I shall complete and submit Standard Form-LLL, Disclosure Form to Report Lobbying. I certify that I shall require all subawards at all tiers (including sub-grants and contracts) to similarly certify and disclose accordingly. Federally recognized Indian Tribes and tribally designated housing entities (TDHEs) established by Federally-recognized Indian tribes as a result of the exercise of the tribe's sovereign power are excluded from coverage by the Byrd Amendment, but State-recognized Indian tribes and TDHEs established under State law are not excluded from the statute's coverage.

I/We, the undersigned, certify under penalty of perjury that the information provided above is true, accurate, and correct. WARNING: Anyone who knowingly submits a false claim or makes a false statement is subject to criminal and/or civil penalties, including confinement for up to 5 years, fines, and civil and administrative penalties. (18 U.S.C. §§287, 1001, 1010, 1012, 1014; 31 U.S.C. §3729, 3802; 24 CFR §28.10(b)(1)(iii)).

* Signature:

Dulce Quintero by Shelby
Weishaar

Digitally signed by Dulce Quintero by Shelby
Weishaar
Date: 2023.07.20 13:18:30 -0500

* Date: (mm/dd/yyyy): 07/25/2023

Form HUD 424-B (1/27/2023)

Public Reporting Burden Statement: The public reporting burden for this collection of information is estimated to average 0.5 hours per response, including the time for reviewing instructions, searching existing data sources, gathering, and maintaining the data needed, and completing and reviewing the collection of information. Comments regarding the accuracy of this burden estimate and any suggestions for reducing this burden can be sent to: U.S. Department of Housing and Urban Development, Office of the Chief Data Officer, R, 451 7th St SW, Room 4176, Washington, DC 20410-5000. **Do not send completed HUD 424-B forms to this address.** This agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless the collection displays a valid OMB control number. The Department of Housing and Urban Development is authorized to collect this information under the authority cited in the Notice of Funding Opportunity for this grant program. The information collected provides assurances and certifications for legal requirements related to the administration of this grant program. HUD will use this information to ensure compliance of its grantees. This information is required to obtain the benefit sought in the grant program. This information will not be held confidential and may be made available to the public in accordance with the Freedom of Information Act (5 U.S.C. §552).

Form HUD 424-B (1/27/2023)

Application for Federal Assistance SF-424		
* 1. Type of Submission: <input type="checkbox"/> Preapplication <input checked="" type="checkbox"/> Application <input type="checkbox"/> Changed/Corrected Application	* 2. Type of Application: <input checked="" type="checkbox"/> New <input type="checkbox"/> Continuation <input type="checkbox"/> Revision	* If Revision, select appropriate letter(s): <input type="text"/> * Other (Specify): <input type="text"/>
* 3. Date Received: <input type="text" value="07/17/2025"/>	4. Applicant Identifier: <input type="text"/>	
5a. Federal Entity Identifier: <input type="text"/>	5b. Federal Award Identifier: <input type="text"/>	
State Use Only:		
6. Date Received by State: <input type="text"/>	7. State Application Identifier: <input type="text"/>	
8. APPLICANT INFORMATION:		
* a. Legal Name: <input type="text" value="State of Illinois"/>		
* b. Employer/Taxpayer Identification Number (EIN/TIN): <input type="text" value="01-0612628"/>	* c. UEI: <input type="text" value="000000000000000000"/>	
d. Address:		
* Street1: <input type="text" value="523-525 West Jefferson Street"/>	<input type="text"/>	
Street2: <input type="text"/>	<input type="text"/>	
* City: <input type="text" value="Springfield"/>	<input type="text"/>	
County/Parish: <input type="text"/>	<input type="text"/>	
* State: <input type="text" value="IL - Illinois"/>	<input type="text"/>	
Province: <input type="text"/>	<input type="text"/>	
* Country: <input type="text" value="USA - UNITED STATES"/>	<input type="text"/>	
* Zip (Postal Code): <input type="text" value="62761-0001"/>	<input type="text"/>	
e. Organizational Unit:		
Department Name: <input type="text" value="IL Dept. of Public Health"/>	Division Name: <input type="text" value="HIV/AIDS Section"/>	
f. Name and contact information of person to be contacted on matters involving this application:		
Prefix: <input type="text"/>	* First Name: <input type="text" value="Robert"/>	<input type="text"/>
Middle Name: <input type="text"/>	<input type="text"/>	
* Last Name: <input type="text" value="Whitlock"/>	<input type="text"/>	
Suffix: <input type="text"/>	<input type="text"/>	
Title: <input type="text" value="Engage SAHM, Coordinator, HIV/AIDS Section"/>		
Organizational Address: <input type="text" value="Illinois Department of Public Health"/>		
* Telephone Number: <input type="text" value="217-534-6712"/>	Fax Number: <input type="text"/>	
* Email: <input type="text" value="rob4rt.whitlock@illinois.gov"/>		

Application for Federal Assistance SF-424	
<p>* 9. Type of Applicant 1: Select Applicant Type:</p> <input type="text" value="R1: State Government"/>	
<p>Type of Applicant 2: Select Applicant Type:</p> <input type="text"/>	
<p>Type of Applicant 3: Select Applicant Type:</p> <input type="text"/>	
<p>* Other (specify):</p> <input type="text"/>	
<p>* 10. Name of Federal Agency:</p> <input type="text" value="U.S. Department of Housing and Urban Development"/>	
<p>11. Assistance Listing Number:</p> <input type="text" value="14-0001"/>	
<p>Assistance Listing Title:</p> <input type="text" value="The HOME Program"/>	
<p>* 12. Funding Opportunity Number:</p> <input type="text" value="Not Applicable"/>	
<p>* Title:</p> <input type="text" value="Not Applicable; The HOME Program is a Federal Grant Program"/>	
<p>13. Competition Identification Number:</p> <input type="text" value="Not Applicable"/>	
<p>Title:</p> <input type="text" value="Not Applicable; The HOME Program is a Federal Grant Program"/>	
<p>14. Areas Affected by Project (Cities, Counties, States, etc.):</p> <input type="text"/> <div style="display: flex; justify-content: space-around; margin-top: 5px;"> <input type="button" value="Add Attachment"/> <input type="button" value="Clear Attachment"/> <input type="button" value="Copy Attachment"/> </div>	
<p>* 15. Descriptive Title of Applicant's Project:</p> <input type="text" value="The HOME Program Federal Program Year 2021 is to provide grants to projects to assist the housing assistance and supportive services for low-income persons with HIV/AIDS and their families."/>	
<p>Attach supporting documents as specified in agency instructions:</p> <div style="display: flex; justify-content: space-around; margin-top: 5px;"> <input type="button" value="Add Attachments"/> <input type="button" value="Download Attachment"/> <input type="button" value="View Attachment"/> </div>	

Application for Federal Assistance SF-424	
16. Congressional Districts Of:	
* a. Applicant: <input type="text" value="ALL"/>	* b. Program/Project: <input type="text" value="TOD"/>
Attach an additional list of Program/Project Congressional Districts if needed:	
<input type="text"/>	<input type="button" value="Add Attachment"/> <input type="button" value="Create Attachment"/> <input type="button" value="Add Attachment"/>
17. Proposed Project:	
* a. Start Date: <input type="text" value="01/01/2024"/>	* b. End Date: <input type="text" value="12/31/2025"/>
18. Estimated Funding (\$):	
* a. Federal:	<input type="text" value="2,552,336.00"/>
* b. Applicant:	<input type="text"/>
* c. State:	<input type="text"/>
* d. Local:	<input type="text"/>
* e. Other:	<input type="text"/>
* f. Program Income:	<input type="text"/>
* g. TOTAL:	<input type="text" value="2,552,336.00"/>
* 19. Is Application Subject to Review By State Under Executive Order 12372 Process?	
<input type="checkbox"/> a. This application was made available to the State under the Executive Order 12372 Process for review on <input type="text"/>	
<input type="checkbox"/> b. Program is subject to E.O. 12372 but has not been selected by the State for review.	
<input checked="" type="checkbox"/> c. Program is not covered by E.O. 12372.	
* 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)	
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
If "Yes", provide explanation and attach:	
<input type="text"/>	<input type="button" value="Add Attachment"/> <input type="button" value="Create Attachment"/> <input type="button" value="Add Attachment"/>
21. *By signing this application, I certify (1) to the statements contained in the list of certifications** and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 18, Section 1001)	
<input checked="" type="checkbox"/> ** I AGREE	
** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.	
Authorized Representative:	
Prefix: <input type="text" value="Mr."/>	* First Name: <input type="text" value="FRANCIS"/>
Middle Name: <input type="text"/>	
* Last Name: <input type="text" value="Bauer"/>	
Suffix: <input type="text"/>	
* Title: <input type="text" value="Executive Director, Illinois Development Authority"/>	
* Telephone Number: <input type="text" value="618-416-0018"/>	Fax Number: <input type="text" value="618-416-0070"/>
* Email: <input type="text" value="francis@ilda.org"/>	
* Signature of Authorized Representative: 	* Date Signed: <input type="text" value="07/29/2025"/>

Instructions for the HUD 424-B Assurances and Certifications

As part of your application for HUD funding, you, as the official authorized to sign on behalf of your organization or as an individual, must provide the following assurances and certifications. The Responsible Civil Rights Official has specified this form for use for purposes of general compliance with 24 CFR §§ 1.5, 3.115, 8.50, and 146.25, as applicable. The Responsible Civil Rights Official may require specific civil rights assurances to be furnished consistent with those authorities and will specify the form on which such assurances must be made. A failure to furnish or comply with the civil rights assurances contained in this form may result in the procedures to effect compliance at 24 CFR §§ 1.8, 3.115, 8.57, or 146.39.

By submitting this form, you are stating that all assertions made in this form are true, accurate, and correct.

As the duly representative of the applicant, I certify that the applicant: [Insert below the Name and Title of the Authorized Representative, name of Organization and the date of signature]:

*Authorized Representative Name:

Dr. Samsar Voltra

*Title:

*Applicant/Recipient Organization:

Illinois Department of Public Safety

I. Has the legal authority to apply for Federal assistance, has the institutional, managerial and financial capability (including funds to pay the non-Federal share of program costs) to plan, manage and complete the program as described in the application and the governing body has duly authorized the submission of the application, including these assurances and certifications, and authorized me as the official representative of the applicant to act in connection with the application and to provide any additional information as may be required.

2. Will administer the grant in compliance with Title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000(d)) and implementing regulations (24 CFR part 1) which provide that no person in the United States shall, on the grounds of race, color or national origin, be excluded from participation in, be denied the benefits of, or otherwise be subject to discrimination under any program or activity that receives Federal financial assistance OR if the applicant is a Federally recognized Indian tribe or its tribally designated housing entity, is subject to the Indian Civil Rights Act (25 U.S.C. 1301-1303).

3. Will administer the grant in compliance with Section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 794), as amended, and implementing regulations at 24 CFR part 8, the American Disabilities Act (42 U.S.C. §§ 12101 et seq.), and implementing regulations at 28 CFR part 35 or 36, as applicable, and the Age Discrimination Act of 1975 (42 U.S.C. 6101-07) as amended, and implementing regulations at 24 CFR part 146 which together provide that no person in the United States shall, on the grounds of disability or age, be excluded from participation in, be denied the benefits of, or otherwise be subjected to discrimination under any program or activity that receives Federal financial assistance; except if the grant program authorizes or limits participation to designated populations, then the applicant will comply with the nondiscrimination requirements within the designated population.

4. Will comply with the Fair Housing Act (42 U.S.C. 3601-15) as amended, and the implementing regulations at 24 CFR part 100, which prohibit discrimination in housing on the basis of race, color, religion, sex, disability, familial status, or national origin and will affirmatively further fair housing; except an applicant which is an Indian tribe or its instrumentality which is excluded by statute from coverage does not make this certification; and further except if the grant program authorizes or limits participation to designated populations, then the applicant

will comply with the nondiscrimination requirements within the designated population.

5. Will comply with all applicable Federal nondiscrimination requirements, including those listed at 24 CFR §§ 5.105(a) and 5.106 as applicable.

6. Will not use Federal funding to promote diversity, equity, and inclusion (DEI) mandates, policies, programs, or activities that violate any applicable Federal anti-discrimination laws.

7. Will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended (42 U.S.C. 4601) and implementing regulations at 48 CFR part 24 and, as applicable, Section 104(d) of the Housing and Community Development Act of 1974 (42 U.S.C. 5304(d)) and implementing regulations at 24 CFR part 42, subpart A.

8. Will comply with the environmental requirements of the National Environmental Policy Act (42 U.S.C. 4321 et seq.) and related Federal authorities prior to the commitment or expenditure of funds for property.

9. That no Federal appropriated funds have been paid, or will be paid, by or on behalf of the applicant, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, and officer or employee of Congress, or an employee of a Member of Congress, in connection with the awarding of this Federal grant or its extension, renewal, amendment or modification, if funds other than Federal appropriated funds have or will be paid for influencing or attempting to influence the persons listed above, I shall complete and submit Standard Form LLL, Disclosure Form to Report Lobbying. I certify that I shall require all subawards at all tiers (including sub-grants and contracts) to similarly certify and disclose accordingly. Federally recognized Indian Tribes and tribally designated housing entities (TDHEs) established by Federally-recognized Indian tribes as a result of the exercise of the tribe's sovereign power are excluded from coverage by the Byrd Amendment, but State-recognized Indian tribes and TDHEs established under State law are not excluded from the statute's coverage.

I/We, the undersigned, certify under penalty of perjury that the information provided above is true, accurate, and correct. WARNING: Anyone who knowingly submits a false claim or makes a false statement is subject to criminal and/or civil penalties, including confinement for up to 5 years, fines, and civil and administrative penalties. (18 U.S.C. §§287, 1001, 1010, 1012, 1014; 31 U.S.C. §3729, 3802; 24 CFR §28.10(b)(1)(iii)).

* Signature:

Samsar Voltra by Jaime
Lundquist

Digitally signed by Samsar Voltra by Jaime
Lundquist
DN: cn=Samsar Voltra by Jaime

* Date: (mm/dd/yyyy), 07/20/25

Public Reporting Burden Statement: The public reporting burden for this collection of information is estimated to average 0.5 hours per response, including the time for reviewing instructions, searching existing data sources, gathering, and maintaining the data needed, and completing and reviewing the collection of information. Comments regarding the accuracy of this burden estimate and any suggestions for reducing this burden can be sent to: U.S. Department of Housing and Urban Development, Office of the Chief Data Officer, R-451 7th St SW, Room 4176, Washington, DC 20410-8000. **Do not send completed HUD 424-B forms to this address.** This agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless the collection displays a valid OMB control number. The Department of Housing and Urban Development is authorized to collect this information under the authority cited in the Notice of Funding Opportunity for this grant program. The information collected provides assurances and certifications for legal requirements related to the administration of this grant program. HUD will use this information to ensure compliance of its grantees. This information is required to obtain the benefit sought in the grant program. This information will not be held confidential and may be made available to the public in accordance with the Freedom of Information Act (5 U.S.C. §552).

Form HUD 424-B (1/27/2025)

Appendix - Alternate/Local Data Sources

1	Data Source Name Maplebrook County needs study
	List the name of the organization or individual who originated the data set. Maplebrook County
	Provide a brief summary of the data set. An analysis of existing housing and land use and a survey of residents regarding priority needs.
	What was the purpose for developing this data set? To support the Con Plan needs assessment
	How comprehensive is the coverage of this administrative data? Is data collection concentrated in one geographic area or among a certain population? One county, countywide.
	What time period (provide the year, and optionally month, or month and day) is covered by this data set? July 2014
	What is the status of the data set (complete, in progress, or planned)? complete
2	Data Source Name 2007-2011 ACS
	List the name of the organization or individual who originated the data set. U.S. Census Bureau
	Provide a brief summary of the data set.
	What was the purpose for developing this data set?
	How comprehensive is the coverage of this administrative data? Is data collection concentrated in one geographic area or among a certain population?
	What time period (provide the year, and optionally month, or month and day) is covered by this data set? REO Properties as of July 2014

	What is the status of the data set (complete, in progress, or planned)?
3	Data Source Name IDPH HIV/AIDS data as of December 2014
	List the name of the organization or individual who originated the data set. Illinois Department of Public Health
	Provide a brief summary of the data set. Suveillance data conducted by the Department
	What was the purpose for developing this data set? To have more timely and accurate data for the State.
	How comprehensive is the coverage of this administrative data? Is data collection concentrated in one geographic area or among a certain population? Data is for State of Illinois HOPWA jurisdictional area (excludes Chicago metro area, and Metro East area).
	What time period (provide the year, and optionally month, or month and day) is covered by this data set? As of December 2014
	What is the status of the data set (complete, in progress, or planned)? Complete
4	Data Source Name 2008-2012 ACS
	List the name of the organization or individual who originated the data set. U.S. Census Bureau
	Provide a brief summary of the data set.
	What was the purpose for developing this data set?
	How comprehensive is the coverage of this administrative data? Is data collection concentrated in one geographic area or among a certain population?

	<p>What time period (provide the year, and optionally month, or month and day) is covered by this data set?</p>
	<p>What is the status of the data set (complete, in progress, or planned)?</p> <p>Complete</p>
5	<p>Data Source Name</p> <p>ACS 2014-2018</p>
	<p>List the name of the organization or individual who originated the data set.</p>
	<p>Provide a brief summary of the data set.</p>
	<p>What was the purpose for developing this data set?</p>
	<p>How comprehensive is the coverage of this administrative data? Is data collection concentrated in one geographic area or among a certain population?</p>
	<p>What time period (provide the year, and optionally month, or month and day) is covered by this data set?</p>
	<p>What is the status of the data set (complete, in progress, or planned)?</p>
6	<p>Data Source Name</p> <p>FHFA, 2012</p>
	<p>List the name of the organization or individual who originated the data set.</p> <p>Federal Housing Finance Agency</p>
	<p>Provide a brief summary of the data set.</p> <p>Real Estate Owner Properties</p>
	<p>What was the purpose for developing this data set?</p>
	<p>How comprehensive is the coverage of this administrative data? Is data collection concentrated in one geographic area or among a certain population?</p> <p>Real Estate Owned (REO) properties for the State of Illinois</p>

	<p>What time period (provide the year, and optionally month, or month and day) is covered by this data set?</p>
	<p>What is the status of the data set (complete, in progress, or planned)?</p> <p>Nationwide Survey complete as of 2012 issuance date by FHFA, There is no information from FHFA on planned update</p>
7	<p>Data Source Name</p> <p>2019 Continuum of Care PIT Count</p>
	<p>List the name of the organization or individual who originated the data set.</p> <p>HUD Continuum of Care Housing Inventory Count Point In Time Data</p>
	<p>Provide a brief summary of the data set.</p>
	<p>What was the purpose for developing this data set?</p>
	<p>How comprehensive is the coverage of this administrative data? Is data collection concentrated in one geographic area or among a certain population?</p>
	<p>What time period (provide the year, and optionally month, or month and day) is covered by this data set?</p>
	<p>What is the status of the data set (complete, in progress, or planned)?</p> <p>Complete</p>
8	<p>Data Source Name</p> <p>2019 ESG SAGE Report</p>
	<p>List the name of the organization or individual who originated the data set.</p> <p>Continuum of Care (CoC) Homeless Management Information System</p>
	<p>Provide a brief summary of the data set.</p>
	<p>What was the purpose for developing this data set?</p>

	<p>How comprehensive is the coverage of this administrative data? Is data collection concentrated in one geographic area or among a certain population?</p>
	<p>What time period (provide the year, and optionally month, or month and day) is covered by this data set?</p>
	<p>What is the status of the data set (complete, in progress, or planned)? 2019 Report Complete</p>
9	<p>Data Source Name 2022 ACS 5 year figures</p>
	<p>List the name of the organization or individual who originated the data set.</p>
	<p>Provide a brief summary of the data set.</p>
	<p>What was the purpose for developing this data set?</p>
	<p>Provide the year (and optionally month, or month and day) for when the data was collected.</p>
	<p>Briefly describe the methodology for the data collection.</p>
	<p>Describe the total population from which the sample was taken.</p>
	<p>Describe the demographics of the respondents or characteristics of the unit of measure, and the number of respondents or units surveyed.</p>
10	<p>Data Source Name 2023 ACS</p>
	<p>List the name of the organization or individual who originated the data set.</p>
	<p>Provide a brief summary of the data set.</p>

	What was the purpose for developing this data set?
	Provide the year (and optionally month, or month and day) for when the data was collected.
	Briefly describe the methodology for the data collection.
	Describe the total population from which the sample was taken.
	Describe the demographics of the respondents or characteristics of the unit of measure, and the number of respondents or units surveyed.
11	Data Source Name 2024 ESG SAGE Report
	List the name of the organization or individual who originated the data set. Continuum of Care (CoC) Homeless Management Information System.
	Provide a brief summary of the data set.
	What was the purpose for developing this data set?
	How comprehensive is the coverage of this administrative data? Is data collection concentrated in one geographic area or among a certain population?
	What time period (provide the year, and optionally month, or month and day) is covered by this data set?
	What is the status of the data set (complete, in progress, or planned)? 2024 SAGE Report Complete.