

## Executive Summary

### AP-05 Executive Summary - 24 CFR 91.200(c), 91.220(b)

#### 1. Introduction

The U.S. Department of Housing and Urban Development (HUD) requires State and local grantees of the formula grant programs, namely the Community Development Block Grant (CDBG) the HOME Program, the Emergency Solutions Grants (ESG), the Housing Opportunities for Persons with AIDS (HOPWA) and the federal Housing Trust Fund (HTF) programs, to develop a five-year Consolidated Plan as a condition for funding. The State of Illinois' Consolidated Plan covers those non-entitlement areas of the State that do not have a local Consolidated Plan. On June 16, 1994, Governor Edgar designated the Illinois Housing Development Authority (IHDA) as the lead agency in developing the Consolidated Plan. IHDA's Strategic Planning and Reporting-Reporting and Compliance (CR) has primary responsibility for coordinating, developing and distributing the Plan, and receives input from the CR 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 Illinois 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. The Executive Director of the Illinois Housing Development Authority (IHDA) is Chair of the State's Housing Task Force, joined by a panel of representatives from State agencies and the housing community. The identification of the following eight underserved populations in the Executive Order provides specificity to the State's housing priorities:

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 persons residing in communities with ongoing community revitalization effort;
8. Other special needs populations, including persons 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 (ACHP) addressing the housing needs of the underserved populations. Annual Comprehensive Housing Plans are to include an identification of funding sources for which the State has administrative control that are available for housing construction, rehabilitation, preservation, operating or rental subsidies, and supportive services. A key focus of the 2026 ACHP will be closing out existing and ongoing planning endeavors carried over from prior years, in preparation for a new planning process following reauthorization/modification of the ACHP Act in 2026.

## **2. Summarize the objectives and outcomes identified in the Plan**

This could be a restatement of items or a table listed elsewhere in the plan or a reference to another location. It may also contain any essential items from the housing and homeless needs assessment, the housing market analysis or the strategic plan.

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

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

Sustainability for the purpose of providing decent affordable housing.

## **3. Evaluation of past performance**

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

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 the 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 the publication of this document covered Program Year 2024.

On Friday, June 13, 2025, HUD's Office of Community Planning and Development in Chicago issued its 2024 Illinois 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.

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

## Summary from citizen participation section of plan.

The Citizen Participation Plan centers around the public hearing and public comments processes. The State will hold one hybrid public hearing on Wednesday, May 20, 2026, at 10:30 A.M.. The 30-Day Public Comment period starts Wednesday, April 29, 2026, and comments will be accepted until COB, Thursday, May 28, 2026.

1. A 2026 Hybrid Public Notice was e-mailed statewide to housing-related agencies and organizations, a number of which included announcement of same in a newsletter or mailing sent to their memberships. Copies were also sent to the members of the Advisory Committee and CDBG Entitlement Grantees
2. The Hybrid Public Notice was published prior to these hearings in the following nine (9) newspapers: *Belleville News; Champaign News-Gazette; Daily Southtown; the Edwardsville Intelligencer; Peoria Journal-Star; The Dispatch Argus; Rockford Register Star; Southern Illinoisan and the State Journal-Register.*
3. DCEO e-mailed notices of the hybrid public hearing to CDBG-eligible units of general local government in Illinois (i.e., non-entitlement cities, towns, villages, and counties).
4. Notification of the availability of the draft 2026 Consolidated Plan-Action Plan was emailed to organizations and interested parties across the State. Notification was sent to the Advisory Committee, Illinois Housing Task Force, and Affordable Housing Trust Fund Advisory Commission Members, Community Development Block Grant (CDBG) Entitlement Grantees, Community Action Agencies, Regional Planning Commissions, Public Housing Authorities, and other groups. The draft plan was also posted on IHDA's website at [www.ihda.org](http://www.ihda.org).
5. The hybrid public hearing was held during the 30-day public comments period via Microsoft Teams, telephone, and in person via the Illinois Housing Development Authority (Office) at 111 E. Wacker Drive, Suite 1000, Chicago, Illinois 60601. The date for the hearing, Wednesday, May 20, 2026, was also posted on IHDA's web-site.
6. The agenda for the hybrid public hearing is included as part of the Public Participation component attached to this plan.
7. IHDA made reasonable efforts to accommodate persons with sight-and hearing-impaired disabilities, as well as for significant groups of Non-English speaking residents.
8. Notes from the hybrid public hearing are included in the plan.
9. The development of both the Citizen Participation Plan and Consolidated Plan provided ample opportunity for the public to provide comments.

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

## **Changes to Action Plan**

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

- (1) A major statutory change occurs in the enabling law which created the program that modifies the eligible types of applicants and/or the eligible types of activities which can be carried out, provided same were not at least partially eligible under the original statute and rules.
- (2) Major changes in the use of the five formula grant funds from one eligible activity (as identified in the Consolidated Plan) over the original planned use.
- (3) Other legislative or administrative actions that serve to significantly alter which agency(ies) are operating which existing, expanded, or new programs covered under the current (or potentially expanded) Consolidated Plan.
- (4) Major change(s) due to disaster and/or emergency funding, where timeliness in meeting emergency needs is a priority. The State will follow any HUD waiver(s) and guideline(s) to abridge and shorten the citizen participation component, such as reducing the duration of the public comments period, per official guidance; and in cases of public health emergency, the State will utilize alternate methods in lieu of holding in-person meetings and hearings.
  1. In any of the above cases, this citizen participation plan will require that public notification occur per the following: notification to OHCS Advisory Committee, various State Agencies Housing, and additional housing-related organizations, to inform them of the proposed amendment and provide for a 30-day (or in case of emergency/public health crisis, an expedited) public comments period; and publication of press releases and public notices, and mailings, as is appropriate, to affected parties.
- (5) The State shall consider all legitimate comments on the amendment, which are received in writing and orally at public hearings (if held) from the general public or units of general local government. A summary of those comments and the State responses to same will be attached to the substantial amendment, which the State will then forward to HUD for review and approval.

## **5. Summary of public comments**

This could be a brief narrative summary or reference an attached document from the Citizen Participation section of the Con Plan.

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

Not applicable.

**7. Summary**

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

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

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

| Agency Role         | Name     | Department/Agency                                  |
|---------------------|----------|--|
| CDBG Administrator  |          | 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.

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

community. The identification of the following eight underserved populations in the Executive Order provides specificity to the State's housing priorities:

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 underserved populations. Annual Comprehensive Housing Plans are to include an identification of funding sources for which the State has administrative control that are available for housing construction, rehabilitation, preservation, operating or rental subsidies, and supportive services.

### **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):**

Steve Hopkins

Ph: 217/785-5260 Fax:

Alternate: Marleigh Andrews-Conrad

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

Kert McAfee

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

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

### **1. Introduction**

The State consulted the following major advisory bodies:

1. Strategic Planning and Reporting-Compliance and Reporting (SPAR-CR) Advisory Committee (SPAR-CR AC) - 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 on a continuous basis
2. The Illinois Housing Task Force - The Task Force consists of members which are representative of various governmental agencies and/or offices, four of which are appointed by the four legislative majority and minority leaders and sixteen of which were appointed directly by the Governor based on their expertise on housing or housing-related areas. The Task Force is chaired by the Executive Director of IHDA. and Vice-Chaired by a non-governmental sector representative appointed by the Governor.

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

Public Housing Authorities are represented on the SPAR-CR Advisory Committee, the Illinois Housing Task Force, and the State's Affordable Housing (Reust 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.

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.

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

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

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

**Table 2 – Agencies, groups, organizations who participated**

|          |  |  |
|----------|--|--|
| <b>1</b> | <b>Agency/Group/Organization</b>   | ALLIANCE TO END HOMELESSNESS IN SUBURBANK COOK COUNTY  |
|          | <b>Agency/Group/Organization Type</b>  | Housing<br>Services - Housing<br>Services-Victims of Domestic Violence<br>Regional organization  |
|          | <b>What section of the Plan was addressed by Consultation?</b>   | Homeless Needs - Chronically homeless<br>Homeless Needs - Families with children<br>Homelessness Needs - Veterans<br>Homelessness Needs - Unaccompanied youth<br>Homelessness Strategy |
|          | <b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b> |  |

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

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

| <b>Name of Plan</b> | <b>Lead Organization</b> | <b>How do the goals of your Strategic Plan overlap with the goals of each plan?</b> |
|---------------------|--------------------------|---|
| Continuum of Care   |                          |   |

**Table 3 - Other local / regional / federal planning efforts**

**Narrative**

**AP-12 Participation - 91.115, 91.300(c)**

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

**Citizen Participation Outreach**

| <b>Sort Order</b> | <b>Mode of Outreach</b> | <b>Target of Outreach</b> | <b>Summary of response/attendance</b> | <b>Summary of comments received</b> | <b>Summary of comments not accepted and reasons</b> | <b>URL (if applicable)</b> |
|-------------------|-------------------------|---------------------------|---------------------------------------|-------------------------------------|---|----------------------------|
|                   |                         |                           |                                       |                                     |   |                            |

**Table 4 – Citizen Participation Outreach**

## Expected Resources

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

#### Introduction

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

#### 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<br>Admin and Planning<br>Economic Development<br>Housing<br>Public Improvements<br>Public Services | 0.00                             | 0.00               | 0.00                     | 0.00      | 0.00  |                       |

| 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<br>Homebuyer assistance<br>Homeowner rehab<br>Multifamily rental new construction<br>Multifamily rental rehab<br>New construction for ownership<br>TBRA | 15,294,368.28                    | 13,630,863.87      | 0.00                     | 28,925,232.15 | 0.00  |                       |
| HOPWA   | public - federal | Permanent housing in facilities<br>Permanent housing placement<br>Short term or transitional housing facilities<br>STRMU<br>Supportive services<br>TBRA             | 0.00                             | 0.00               | 0.00                     | 0.00          | 0.00  |                       |

| 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<br>Financial Assistance<br>Overnight shelter<br>Rapid re-housing (rental assistance)<br>Rental Assistance Services<br>Transitional housing | 0.00                             | 0.00               | 0.00                     | 0.00      | 0.00  |                       |
| HTF     | public - federal | Acquisition<br>Admin and Planning<br>Homebuyer assistance<br>Multifamily rental new construction<br>Multifamily rental rehab<br>New construction for ownership                           | 0.00                             | 0.00               | 0.00                     | 0.00      | 0.00  |                       |

Table 5 - Expected Resources – Priority Table

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

**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
- Federal Home Loan Bank Grants
- Value of donated materials 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 credit
- 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

**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 anticipated most national HTF funded projects will be highly leveraged

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

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

**Discussion**

The 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-media-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:<br>\$15,294,368.28 |                        |
| 2          | Federal Housing Trust Fund                         | 2025       | 2029     | Affordable Housing                            | Statewide Distribution | National Housing Trust Fund        |                          |                        |
| 3          | SingleFamily Owner Occupied Housing Rehabilitation | 2025       | 2029     | Affordable Housing                            |                        | Affordable Housing                 |                          |                        |
| 4          | Public Infrastructure                              | 2025       | 2029     | Non-Housing Community Development             | Statewide Distribution | Community and Economic Development |                          |                        |
| 5          | Community & Economic Revitalization                | 2025       | 2029     | Non-Housing Community Development             | Statewide Distribution | Community and Economic Development |                          |                        |
| 6          | Disaster Response Program                          | 2025       | 2029     | Non-Housing Community Development             | Statewide Distribution | Community and Economic Development |                          |                        |
| 7          | Housing For Persons with HIV/AIDS                  | 2025       | 2029     | Affordable Housing Non-Homeless Special Needs |                        | Special Needs                      |                          |                        |

| Sort Order | Goal Name                             | Start Year | End Year | Category  | Geographic Area        | Needs Addressed    | Funding | Goal Outcome Indicator |
|------------|---------------------------------------|------------|----------|---|------------------------|--------------------|---------|------------------------|
| 8          | 2025-2029 Permanent Housing Placement | 2025       | 2029     | Affordable Housing<br>Non-Homeless<br>Special Needs |                        | Special Needs      |         |                        |
| 9          | Street Outreach to Homeless           | 2025       | 2029     | Homeless  | Statewide Distribution | Affordable Housing |         |                        |
| 10         | Provide Emergency Shelter to Homeless | 2025       | 2029     | Homeless  | Statewide Distribution | Affordable Housing |         |                        |
| 11         | Prevent Homelessness                  | 2025       | 2029     | Homeless  | Statewide Distribution | Affordable Housing |         |                        |
| 12         | Rapid Re-Housing of Homeless          | 2025       | 2029     | Homeless  | Statewide Distribution | Affordable Housing |         |                        |

**Table 6 – 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 |  |
| 4 | Goal Name        | Public Infrastructure                              |
|   | Goal Description |  |

|    |                         |                                       |
|----|-------------------------|---------------------------------------|
| 5  | <b>Goal Name</b>        | Community & Economic Revitalization   |
|    | <b>Goal Description</b> |                                       |
| 6  | <b>Goal Name</b>        | Disaster Response Program             |
|    | <b>Goal Description</b> |                                       |
| 7  | <b>Goal Name</b>        | Housing For Persons with HIV/AIDS     |
|    | <b>Goal Description</b> |                                       |
| 8  | <b>Goal Name</b>        | 2025-2029 Permanent Housing Placement |
|    | <b>Goal Description</b> |                                       |
| 9  | <b>Goal Name</b>        | Street Outreach to Homeless           |
|    | <b>Goal Description</b> |                                       |
| 10 | <b>Goal Name</b>        | Provide Emergency Shelter to Homeless |
|    | <b>Goal Description</b> |                                       |
| 11 | <b>Goal Name</b>        | Prevent Homelessness                  |
|    | <b>Goal Description</b> |                                       |
| 12 | <b>Goal Name</b>        | Rapid Re-Housing of Homeless          |
|    | <b>Goal Description</b> |                                       |

## AP-25 Allocation Priorities – 91.320(d)

### Introduction:

The amounts allocated to AP-20 do not include Administration and Technical Assistance for the CDBG program. HUD allows for 3% of the annual allocation plus \$1000,000 to be used for Administration and Technical Assistance.

### 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                              | 0   | 0                         | 0                                       | 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                             | 0                                     | 0   | 0                               | 0   | 0                        | 0                   |
| ESG   | 0                                  | 0                              | 0   | 0                         | 0                                       | 0                             | 0                                     | 0   | 0                               | 0   | 0                        | 0                   |
| HTF   | 0                                  | 100                            | 0   | 0                         | 0                                       | 0                             | 0                                     | 0   | 0                               | 0   | 0                        | 0                   |

Table 7 – Funding Allocation Priorities

### Reason for Allocation Priorities

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

## 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 AID (HOPWA); and the federal

Housing Trust Fund (HTF)

### Distribution Methods

Table 8 - Distribution Methods by State Program

|   |  |  |
|---|--|--|
| 1 | <b>State Program Name:</b>   | CDBG Community and Economic Revitalization |
|   | <b>Funding Sources:</b>  | CDBG                                       |
|   | <b>Describe the state program addressed by the Method of Distribution.</b> |  |

|  |  |
|--|--|
| <p><b>Describe all of the criteria that will be used to select applications and the relative importance of these criteria.</b></p>   |  |
| <p><b>If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)</b></p>  |  |
| <p><b>Describe the process for awarding funds to state recipients and how the state will make its allocation available to units of general local government, and non-profit organizations, including community and faith-based organizations. (ESG only)</b></p> |  |

|   |  |
|---|--|
| <p><b>Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)</b></p> |  |
| <p><b>Describe how resources will be allocated among funding categories.</b></p>  |  |
| <p><b>Describe threshold factors and grant size limits.</b></p>   |  |

|   |   |                                |
|---|---|--------------------------------|
|   | <b>What are the outcome measures expected as a result of the method of distribution?</b>                                    |                                |
| 2 | <b>State Program Name:</b>  | CDBG Disaster Response Program |
|   | <b>Funding Sources:</b>   | CDBG                           |
|   | <b>Describe the state program addressed by the Method of Distribution.</b>  |                                |
|   | <b>Describe all of the criteria that will be used to select applications and the relative importance of these criteria.</b> |                                |

|  |  |
|--|--|
| <p><b>If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)</b></p>  |  |
| <p><b>Describe the process for awarding funds to state recipients and how the state will make its allocation available to units of general local government, and non-profit organizations, including community and faith-based organizations. (ESG only)</b></p> |  |
| <p><b>Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)</b></p>  |  |

|   |  |
|---|--|
| <p><b>Describe how resources will be allocated among funding categories.</b></p>                |  |
| <p><b>Describe threshold factors and grant size limits.</b></p>                                 |  |
| <p><b>What are the outcome measures expected as a result of the method of distribution?</b></p> |  |

|          |  |                                     |
|----------|--|-------------------------------------|
| <b>3</b> | <b>State Program Name:</b>   | CDBG Housing Rehabilitation Program |
|          | <b>Funding Sources:</b>  | CDBG                                |
|          | <b>Describe the state program addressed by the Method of Distribution.</b>   |                                     |
|          | <b>Describe all of the criteria that will be used to select applications and the relative importance of these criteria.</b>  |                                     |
|          | <b>If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)</b> |                                     |

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

|                 |   |   |
|-----------------|---|---|
|                 | <p><b>Describe threshold factors and grant size limits.</b></p>                                 |   |
|                 | <p><b>What are the outcome measures expected as a result of the method of distribution?</b></p> |   |
| <p><b>4</b></p> | <p><b>State Program Name:</b></p>   | <p>CDBG Public Infrastructure Program</p> |
|                 | <p><b>Funding Sources:</b></p>  | <p>CDBG</p>                               |
|                 | <p><b>Describe the state program addressed by the Method of Distribution.</b></p>               |   |

|  |  |
|--|--|
| <p><b>Describe all of the criteria that will be used to select applications and the relative importance of these criteria.</b></p>   |  |
| <p><b>If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)</b></p>  |  |
| <p><b>Describe the process for awarding funds to state recipients and how the state will make its allocation available to units of general local government, and non-profit organizations, including community and faith-based organizations. (ESG only)</b></p> |  |

|   |  |
|---|--|
| <p><b>Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)</b></p> |  |
| <p><b>Describe how resources will be allocated among funding categories.</b></p>  |  |
| <p><b>Describe threshold factors and grant size limits.</b></p>   |  |

|   |   |                                    |
|---|---|------------------------------------|
|   | <b>What are the outcome measures expected as a result of the method of distribution?</b>                                    |                                    |
| 5 | <b>State Program Name:</b>  | Emergency Solutions Grants Program |
|   | <b>Funding Sources:</b>   | ESG                                |
|   | <b>Describe the state program addressed by the Method of Distribution.</b>  |                                    |
|   | <b>Describe all of the criteria that will be used to select applications and the relative importance of these criteria.</b> |                                    |

|  |  |
|--|--|
| <p><b>If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)</b></p>  |  |
| <p><b>Describe the process for awarding funds to state recipients and how the state will make its allocation available to units of general local government, and non-profit organizations, including community and faith-based organizations. (ESG only)</b></p> |  |
| <p><b>Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)</b></p>  |  |

|   |  |
|---|--|
| <p><b>Describe how resources will be allocated among funding categories.</b></p>                |  |
| <p><b>Describe threshold factors and grant size limits.</b></p>                                 |  |
| <p><b>What are the outcome measures expected as a result of the method of distribution?</b></p> |  |

|          |  |  |
|----------|--|--|
| <b>6</b> | <b>State Program Name:</b>   | HOME Multifamily (Including CHDO)  |
|          | <b>Funding Sources:</b>  | HOME   |
|          | <b>Describe the state program addressed by the Method of Distribution.</b>   | Multifamily new construction and rehabilitation (including Community Housing Development Organizations - CHDOs)  |
|          | <b>Describe all of the criteria that will be used to select applications and the relative importance of these criteria.</b>  | 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, committment of leveraged resources, and other factors. These factors increase if the Low Income Housing Tax Credit is involved, as the program has its own seperate appliction scoring system. |
|          | <b>If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)</b> | N/A  |

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

|  |  |
|--|--|
| <p><b>Describe how resources will be allocated among funding categories.</b></p> | <p>Under the 2025-2029 Consolidated Plan, IHDA is only utilizing HOME funding for rental housing development/rehabilitation. The program uses IHDA's "Connon Application and funding process.</p> <p>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 2026 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 may reflect more than what is in the AP-15 due to previous year funding that will be carried out in Program Year 2026. 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><b>Describe threshold factors and grant size limits.</b></p>                  | <p>Threshold factors are described in detail in the Multifamily common application referenced above. Grant (loan) size limits have been imposed 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><b>What are the outcome measures expected as a result of the method of distribution?</b></p>                                    | <p>The State of Illinois will use the following HUD-determined Objective and Outcome statements for its CPD-HOME formula activities, expressed via the number of affordable housing units provided/preserved:</p> <ul style="list-style-type: none"> <li>Accessibility for the purpose of creating suitable living environments</li> <li>Accessibility for the purpose of creating economic opportunities</li> <li>Affordability for the purpose of providing decent affordable housing</li> <li>Affordability for the purpose of creating economic opportunities</li> <li>Sustainability for the purpose of creating suitable living environments</li> <li>Sustainability for the purpose of providing decent affordable housing</li> </ul> |
| 7 | <p><b>State Program Name:</b></p>  | <p>HOPWA Permanent Housing Placement Services</p>  |
|   | <p><b>Funding Sources:</b></p>   | <p>HOPWA</p>   |
|   | <p><b>Describe the state program addressed by the Method of Distribution.</b></p>  |  |
|   | <p><b>Describe all of the criteria that will be used to select applications and the relative importance of these criteria.</b></p> |  |

|  |  |
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| <p><b>If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)</b></p>  |  |
| <p><b>Describe the process for awarding funds to state recipients and how the state will make its allocation available to units of general local government, and non-profit organizations, including community and faith-based organizations. (ESG only)</b></p> |  |
| <p><b>Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)</b></p>  |  |

|   |  |
|---|--|
| <p><b>Describe how resources will be allocated among funding categories.</b></p>                |  |
| <p><b>Describe threshold factors and grant size limits.</b></p>                                 |  |
| <p><b>What are the outcome measures expected as a result of the method of distribution?</b></p> |  |

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

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

|   |  |   |
|---|--|---|
|   | <b>Describe threshold factors and grant size limits.</b>                                 |   |
|   | <b>What are the outcome measures expected as a result of the method of distribution?</b> |   |
| 9 | <b>State Program Name:</b>   | National Housing Trust Fund   |
|   | <b>Funding Sources:</b>  | HTF   |
|   | <b>Describe the state program addressed by the Method of Distribution.</b>               | 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><b>Describe all of the criteria that will be used to select applications and the relative importance of these criteria.</b></p>   |  |
| <p><b>If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)</b></p>  |  |
| <p><b>Describe the process for awarding funds to state recipients and how the state will make its allocation available to units of general local government, and non-profit organizations, including community and faith-based organizations. (ESG only)</b></p> |  |

|   |  |
|---|--|
| <p><b>Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)</b></p> |  |
| <p><b>Describe how resources will be allocated among funding categories.</b></p>  |  |
| <p><b>Describe threshold factors and grant size limits.</b></p>   |  |

|    |   |   |
|----|---|---|
|    | <b>What are the outcome measures expected as a result of the method of distribution?</b>                                    |   |
| 10 | <b>State Program Name:</b>  | Short -term Rent, Utility, Mortgage Program (STRUM) |
|    | <b>Funding Sources:</b>   | HOPWA   |
|    | <b>Describe the state program addressed by the Method of Distribution.</b>  |   |
|    | <b>Describe all of the criteria that will be used to select applications and the relative importance of these criteria.</b> |   |

|  |  |
|--|--|
| <p><b>If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)</b></p>  |  |
| <p><b>Describe the process for awarding funds to state recipients and how the state will make its allocation available to units of general local government, and non-profit organizations, including community and faith-based organizations. (ESG only)</b></p> |  |
| <p><b>Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)</b></p>  |  |

|   |  |
|---|--|
| <p><b>Describe how resources will be allocated among funding categories.</b></p>                |  |
| <p><b>Describe threshold factors and grant size limits.</b></p>                                 |  |
| <p><b>What are the outcome measures expected as a result of the method of distribution?</b></p> |  |

**Discussion:**

## AP-35 Projects – (Optional)

Introduction:

| # | Project Name |
|---|--------------|
|   |              |

Table 9 – Project Information

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

## AP-38 Project Summary

### Project Summary Information

| Project Name  | Target Area | Goals Supported | Needs Addressed | Funding | Description | Target Date | Esti<br>and<br>tha<br>from<br>acti |
|---|-------------|-----------------|-----------------|---------|-------------|-------------|------------------------------------|
| <TYPE=[pivot_table] REPORT_GUID=[54A4ED67473EDAEE248792836A1D83B0]> |             |                 |                 |         |             |             |                                    |
|   |             |                 |                 |         |             |             |                                    |

**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?**

**Available Grant Amounts**

**Acceptance process of applications**

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

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

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

## AP-50 Geographic Distribution – 91.320(f)

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

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

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

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

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

### Geographic Distribution

| Target Area            | Percentage of Funds |
|------------------------|---------------------|
| Statewide Distribution | 100                 |

Table 10 - Geographic Distribution

### Rationale for the priorities for allocating investments geographically

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

development, 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 diligently 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:

| One Year Goals for the Number of Households to be Supported |
|---|
| Homeless  |
| Non-Homeless  |
| Special-Needs   |
| Total   |

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

| One Year Goals for the Number of Households Supported Through |
|---|
| Rental Assistance   |
| The Production of New Units                                   |
| Rehab of Existing Units                                       |
| Acquisition of Existing Units                                 |
| Total   |

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

#### Discussion:

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

### **Introduction:**

With passage of the Quality Housing and Work Responsibility Act (QHWRA), 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 Draft Consolidated Plan-Action Plan and the Draft 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 included in the 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 are not covered by a local Consolidated Plan)
- \* IHDA benefits from reviewing the PHA Agency Plans by obtaining information on PHA Waiting Lists.
- \* 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 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 CoC 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 2026 State ESG Allocation is \$5,157,720.

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**

**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**

**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**

## **Discussion**

**AP-70 HOPWA Goals – 91.320(k)(4)**

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

### **Introduction:**

**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**

### **Discussion:**

## **AP-85 Other Actions – 91.320(j)**

### **Introduction:**

**Actions planned to address obstacles to meeting underserved needs**

**Actions planned to foster and maintain affordable housing**

**Actions planned to reduce lead-based paint hazards**

**Actions planned to reduce the number of poverty-level families**

**Actions planned to develop institutional structure**

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

### **Discussion:**

## Program Specific Requirements

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

#### Introduction:

#### Community Development Block Grant Program (CDBG)

##### Reference 24 CFR 91.320(k)(1)

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

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

#### Other CDBG Requirements

|   |       |
|---|-------|
| 1. The amount of urgent need activities   | 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. | 0.00% |

#### 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:
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:
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:
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)).
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)).
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).

**Emergency Solutions Grant (ESG)  
Reference 91.320(k)(3)**

1. Include written standards for providing ESG assistance (may include as attachment)
2. If the Continuum of Care has established centralized or coordinated assessment system that meets HUD requirements, describe that centralized or coordinated assessment system.
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).
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.

5. Describe performance standards for evaluating ESG.

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

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

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".

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".

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".

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".

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".

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".

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".

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".

**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.

**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.

**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).

**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”.

**10. HTF Affordable Homeownership Limits.** If the grantee intends to use HTF funds for homebuyer assistance and does not use the HTF affordable homeownership limits for the area provided by HUD, it must determine 95 percent of the median area purchase price and set forth the information in accordance with §93.305. If the grantee will not use HTF funds to assist first-time homebuyers, enter “N/A”.

Any limitation or preference must not violate nondiscrimination requirements in § 93.350, and the grantee must not limit or give preferences to students. The grantee may permit rental housing owners to limit tenants or give a preference in accordance with § 93.303(d)(3) only if such limitation or preference is described in the action plan.

**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."

### **Discussion:**

For forms and documents relevant to HOME and the national Housing Trust Fund, refer to the IHDA websites "Developer Resource Center"

### **Program Specific Requirements - HOPWA**

The co-administration of HOPWA and Ryan White funding by the Illinois Department of Public Health allows for improved coordination in program planning, new program development, and fund allocation to various activities. The Department has worked with its Part B Advisory Group to ensure that funding aligns to meet the needs of persons living with AIDS. The Part B Advisory Group is constantly responding to meet rising needs. Though the primary focus of Part B funds addresses healthcare costs and related support services, the 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 services and estimated number of persons that will be served by the 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 Region 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 regulations.

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 are 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 non-profit 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.

