

State of Illinois HOME-ARP Allocation Plan

Participating Jurisdiction: State of Illinois (Non-Entitlement)

Date: August 29, 2022

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

Consultation

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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			<ul style="list-style-type: none"> •provide affordable housing with on-going housing stability services tailored to meet individual and households needs. Affordable Rental Housing – 50% Non-Congregate Shelter Units – 50% Tenant-Based Rental Assistance -0% Supportive Services -0%
Women in Need Recovery Dba WIN Recovery	Transitional & Permanent Recovery Housing & Services formerly incarcerated women and individuals/At Risk of Homelessness	Survey and/or Phone Consultation	Stable housing is conducive to individuals that are struggling with drug addiction. An increase in transitional houses and recovery homes after being discharged from inpatient treatment will determine if they will be re-admitted in the future for relapses along with the support services and housing to support severe behavioral and mental disorders. -The needs are programs and housing available to populations that are exiting prison or formerly incarcerated women - The needs are to achieve housing stability without the barrier of criminal background and providing support services to identify housing that will housing vouchers Supportive Services- 50% Rental Housing-50% Non-Congregate Shelter Units – 0% Tenant-Based Rental Assistance -0%
Access Living of Metropolitan Chicago	Persons w/ Disabilities	Survey and/or Phone Consultation	The biggest gap for the disability community is the lack of affordable, accessible housing for people with disabilities. Inaccessibility in shelter systems leaves people with disabilities with few options when facing eviction and homelessness. - Need for available stock of accessible and affordable housing - Enhanced supportive services such as housing counseling and financial literacy, as well as rental assistance programs Affordable Rental Housing – 50% Supportive Services - 25% Tenant-Based Rental Assistance -25% Non-Congregate Shelter -% 0
La Casa Norte	Homeless/At risk Youth and Families services	Survey and/or Phone Consultation	Our communities need more permanent supportive housing, transitional housing (especially for Black and Brown youth), and rental assistance. Within supportive services, more robust mental health resources for youth experiencing homelessness are desperately needed. Prior to the pandemic, 13,663 people experiencing homelessness were single, unaccompanied youth.
Chicago Urban League	African American social and economic empowerment organization	Survey and/or Phone Consultation	The City of Chicago reported that in January 2019 the Department of Family and Support Services provided assistance for the Homeless and that the average homeless client's length of stay at a shelter was 111 days and only 39% of households exited to permanent destinations such as their own rental unit or moving in with family, which of course is still homelessness. This statement alone supports what most housing agencies experience, and that is the lack of shelters that provides support services to the homeless. Supportive Services -50% Affordable Rental Housing- 30 % Non-Congregate Shelter -20% Tenant-Based Rental Assistance -0%
Association for Individual Development (AID)	Serves individuals with developmental, intellectual, physical, mental health challenges, and those who have suffered a trauma and at risk	Email Survey	Needs include deeply affordable housing plus ongoing services and supports are required for homeless population that we support (people with disabilities, physical health conditions, addictions, and long-term experience on the streets). More supportive housing and non-congregate low-demand emergency shelter are desperately needed. Affordable Rental Housing - 50% Non-Congregate Shelter Units-25%

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

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

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

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

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

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

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

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

List the organizations consulted: Public Housing Authorities

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

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

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

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

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

Among the findings:

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

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

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

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

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

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

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

Among the findings:

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

List the organizations consulted: Regional Economic Development Organizations

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

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

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

Among the findings:

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

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

List the organizations consulted: Illinois Participating Jurisdictions

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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Public Participation

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

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

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

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

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

- ***Date(s) of public notice: 7/25/2022***
- ***Public comment period: start date - 8/3/2022 end date - 8/18/2022***
- ***Date(s) of public hearing: 8/16/2022***

Describe the public participation process:

IHDA opened a 15-day public comment period that ran from August 3 through August 18, 2022. The HOME-ARP Draft Allocation Plan for Public Comment was released alongside information about the public comment period, the public hearing, and methods for submitting a public comment. Language of the notice is attached below. This information was distributed using the following methods:

1. Written notice published in the following nine (9) newspapers: Belleville News Democrat; Breeze Courier; Champaign News-Gazette; Daily Southtown; Peoria Journal-Star; The Dispatch Argus; Rockford Register Star; Southern/Southern Illinoisan and the State Journal-Register.
2. The draft plan and notices were posted on IHDA’s website at www.ihda.org.
3. The draft plan and notices were 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. Notification was sent to the Advisory Committee, Illinois Housing Task Force, Affordable Housing Trust Fund Advisory Commission, Community Action Agencies, Regional Planning Commissions, Public Housing Authorities, and other groups.

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As part of a 15-day public comments period, IHDA held one public hearing. The Public Hearing on the substantial amendment to the State of Illinois 2021 Annual Action Plan for the HOME-ARP Allocation Plan was held on Tuesday, August 16, 2022, at 10:30 A.M. via WebEx call. In addition to members of the public, IHDA staff present on the call included:

Diana Brant
Ben Fenton
Burton Hughes
Liz Kersjes
Daisy Marchan
Evan Ponder
Conora Shaw
Gabriella Ratliff
Monica Enriquez
Deirdre Kenny

After opening the meeting, Burton Hughes turned the public hearing over to Liz Kersjes, who served as the moderator and one of presenters for the hearing. Additional presenters included Ben Fenton and Evan Ponder. The topics covered in the meeting followed the Agenda, which is included below. The information shared in the meeting reflected the slide presentation for the meeting, also included below.

After the presentations ended, the call was opened to members of the public for any comments they may have had. Though members of the public were still indicated as being on the call, no comments, either in person, or via the chat box, were made. Fifteen minutes after the end of the presentations, Burton Hughes adjourned the meeting at approximately 12:15 p.m.

Describe efforts to broaden public participation:

In addition to the standard public participation procedures we have used in the past, we employed the following strategies to broaden public participation:

1. IHDA posted all Notices of Public Hearing in both English and Spanish, the two most commonly spoken languages in Illinois.
2. IHDA held the public hearing virtually, to ensure all who wanted to attend were able to, without facing geographic or travel barriers. Illinois is a geographically large state, and it is important to IHDA to reach residents and housing practitioners from across the state.
3. IHDA partnered with the Illinois Department of Human Services, a sister state agency that focuses extensively on issues of homelessness and housing access, on statewide listening sessions that included individual Statewide CoCs and other partners.
4. IHDA worked with other agencies and partners to expand awareness of the public comments period and public hearing.
5. IHDA created a dedicated public comments email address to make submitting a public comment to IHDA simpler and more streamlined.

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

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IHDA received two (2) written public comment letters, via email, to the email address provided in our public comment period notice. The letters, and the State's response to these letters, are included below.

While IHDA did have attendees join the virtual public hearing and listen to IHDA's presentation on our HOME-ARP process and proposed allocation plan, no attendees chose to speak during the hearing. The meeting began at 10:30 a.m. and adjourned at approximately 12:15 p.m. IHDA left the meeting open and running, in presentation mode with a slide displaying instructions for making a public comment, for an extended period of time to ensure any participants wanting to speak had the space to do so.

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

The first comment received, from the Elgin Human Services Council, recommended the following: "...no HOME-ARP funding should be allocated for the Development of Affordable Rental Housing.

We ask that you consider allotting 85% of the HOME-ARP funds to the Acquisition and Development of Non- Congregate Shelters"

IHDA responded: "While our Allocation Plan proposes allocating 60 percent of our HOME-ARP funds toward the acquisition and development of non-congregate shelter, it also includes the clarification that "Based on the applications received, these amounts and percentages may fluctuate." This will allow us to reserve the right to adjust the percentage of funding spent on non-congregate shelter and on rental housing, based on applications received. Specific guidance will be further described in any Request for Applications/Proposals for eligible uses of HOME-ARP funds."

The second comment received, from South Suburban PADS, also recommended the following: "We would strongly support the inclusion of scattered-site leasing and rental assistance as eligible uses, in addition to physical real estate development."

IHDA responded: "HOME-ARP funds may be used to provide tenant-based rental assistance to qualifying households. However, based on IHDA's outreach and needs assessment work detailed in our draft HOME-ARP Allocation Plan, IHDA does not propose using HOME-ARP funds for tenant-based rental assistance. IHDA will focus its available funding allocation on acquisition and development of non-congregate shelter, and rental housing."

The second comment received, from South Suburban PADS, also recommended the following: "We strongly recommend the inclusion of transitional housing and transitional-RRH (like HUD COC-funded TH-RRH) combined projects as eligible uses."

IHDA responded: "Transitional housing is an approved path for conversion of non-congregate shelter to permanent affordable housing. [...] No HOME-ARP funds may be used for conversion." IHDA also provided details about eligible and ineligible HOME-ARP rental housing types.

The second comment received, from South Suburban PADS, included several additional comments and questions, to which IHDA responded with clarification. Comments and IHDA responses are included below.

STATE OF ILLINOIS PUBLIC NOTICE
Public Hearing on the
Substantial Amendment to the State of Illinois 2021 Annual Action Plan
For the HOME-ARP Allocation Plan

To obtain public input from Illinois residents and to comply with the United States Department of Housing and Urban Development (HUD) rules, which requires the State to develop a HOME-ARP Allocation Plan, the Illinois Housing Development Authority (IHDA), as administrator of the HOME program for the State of Illinois announces the availability of the draft HOME-ARP Allocation Plan, as a substantial amendment to the State of Illinois 2021 Action Plan. This draft HOME-ARP Allocation Plan document will be available to the public electronically by Wednesday, August 3, 2022, and will also be available on request in limited hard copies by mail. Discussion and comments will be limited to the draft HOME-ARP Allocation Plan.

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 downloadable to other libraries located throughout the State.

The State will be holding a fifteen-day public comments period. The public comment period begins Wednesday, August 3, 2022, and ends Thursday, August 18, 2022.

The State will be holding one public hearing on Tuesday, August 16, 2022, at 10:30 A.M. It will be presented via WebEx virtual conferencing. This link will also be posted on the IHDA website.

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

<https://illinois2.webex.com/illinois2/j.php?MTID=m06c38a03ffb168396889979b42b443c0>

The meeting ID is: 2456 411 4200; the meeting Code is: trRvkys5v32

Join by phone: (312) 535-8110 United States Toll (Chicago)
(240) 454-0879 USA Toll

Persons are welcome to provide public comments prior to, at, or after the public hearing. Written comments are also welcomed by email to bhughes@ihda.org or 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) days before the public hearing. IHDA will make reasonable efforts to accommodate such requests. To obtain additional

information concerning the public hearing, please call (312) 836-5383 or TDD/TTY (312) 836-5222.

The State's public comments period begins on Wednesday, August 3, 2022, and all written public comments must be received at IHDA by close of business on Thursday, August 18, 2022. Pending response to any public comments the State will then submit the Substantial Amendment for the HOME-ARP Allocation Plan to HUD.

For further information, contact:

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

AVISO PÚBLICO DEL ESTADO DE ILLINOIS
Audiencia Pública sobre la
Enmienda Sustancial al Plan de Acción Anual del Estado de Illinois 2021
Para el Plan de Asignación HOME-ARP

Para obtener comentarios públicos 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 de Asignación HOME-ARP, la Autoridad de Desarrollo de Vivienda de Illinois (IHDA), como administrador del programa HOME para el Estado de Illinois anuncia la disponibilidad del borrador del Plan de Asignación HOME-ARP, como una enmienda sustancial al Plan de Acción 2021 del Estado de Illinois. Este borrador del documento del Plan de asignación de HOME-ARP estará disponible para el público electrónicamente el día miércoles, 3 de agosto de 2022, y también estará disponible a pedido en copias impresas limitadas por correo. La discusión y los comentarios se limitarán al borrador del Plan de asignación de HOME-ARP.

Una versión electrónica estará disponible en el sitio web de IHDA, www.ihda.org. Las copias electrónicas también estarán disponibles a través de la red de bibliotecas estatales y se podrán descargar a otras bibliotecas ubicadas en todo el estado.

El Estado llevará a cabo un período de comentarios públicos de quince días. El período de comentarios públicos comienza el día miércoles 3 de agosto de 2022 y finaliza el día jueves 18 de agosto de 2022.

El Estado llevará a cabo una audiencia pública el día martes, 16 de agosto 16 de 2022 a las 10:30 a.m. Se presentará a través de conferencias virtuales WebEx. Este enlace también se publicará en el sitio web de IHDA.

El día de la audiencia, acceda a la información de la audiencia siguiendo el enlace:
<https://illinois2.webex.com/illinois2/j.php?MTID=m06c38a03ffb168396889979b42b443c0>

El ID de la reunión es: 2456 411 4200; el código de la reunión es: trRvkys5v32

Únete por teléfono: (312) 535-8110 United States Toll (Chicago)
(240) 454-0879 USA Toll

Las personas son bienvenidas a proporcionar comentarios públicos antes, durante o después de la audiencia pública. Los comentarios escritos también son bienvenidos por correo electrónico a dmarchan@ihda.org o enviados por correo directamente a IHDA para garantizar que los comentarios reciban una respuesta por escrito. Se solicita a las personas con discapacidad auditiva y visual que necesiten servicios como un intérprete o documentos en letra grande/Braille que realicen solicitudes directamente a IHDA a los números de teléfono que se indican a continuación al menos cinco (5) días antes de la audiencia pública. IHDA hará todos los esfuerzos razonables para acomodar 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 del Estado comienza el miércoles 3 de agosto de 2022, y todos los comentarios públicos por escrito deben recibirse en IHDA antes del cierre de operaciones el día jueves 18 de agosto de 2022. En espera de la respuesta a cualquier comentario público, el Estado presentará la Enmienda Sustancial para el Plan de Asignación HOME-ARP a HUD.

Para más información, póngase en contacto con:

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

**Public Hearing Agenda
For the State of Illinois
HOME-ARP Allocation Plan**

Tuesday, August 16, 2022 @ 10:30 A.M.

Public Hearing Agenda

Agenda

- Welcome and Introductions/Overview of Agenda – Reporting and Compliance, Strategic Planning and Reporting (CR-SPAR) Illinois Housing Development Authority (IHDA)
- Background/Requirements of HOME-American Rescue Plan
- Consultation and GAPS Analysis Process
- State of Illinois proposed Eligible Activities for HOME-ARP
- Public Comments and Testimony/Question and Answer Period
- Adjournment

Agenda de Audiencia Pública
Para el estado de Illinois
Plan de Asignación para HOME-ARP

Martes, 16 de agosto @ 10:30 A.M.

Agenda de Audiencia Pública

- Bienvenida y Presentaciones/Resumen de la Agenda – Informes y Cumplimiento, Planificación Estratégica e Informes (CR-SPAR) Autoridad de Desarrollo de Vivienda de Illinois (IHDA)
- Antecedentes/Requisitos de HOME-American Rescue Plan
- Proceso de Consulta y Análisis de Brechas
- Actividades elegibles propuestas por el estado de Illinois para HOME-ARP
- Comentarios Públicos y Testimonio/Período de Preguntas y Respuestas
- Aplazamiento



Public Hearing Agenda For the State of Illinois HOME-ARP Allocation Plan

Illinois Housing Development Authority (IHDA)

Tuesday, August 16, 2022



Illinois Housing Development Authority (IHDA)

IHDA was created by the state legislature in 1967 pursuant to the Illinois Housing Development Act as a self-supporting agency to finance affordable housing across Illinois.

IHDA's mission remains to finance the creation and preservation of affordable housing in Illinois. IHDA accomplishes its mission through federal and state funding sources, including the Illinois Affordable Housing Trust Fund, Illinois Affordable Housing Tax Credits, the allocation of federal Low-Income Housing Tax Credits (LIHTC) and HOME Investment Partnership funds.



Agenda

- I. Welcome
- II. Meeting Format
- III. Background & Requirements of HOME-ARP
- IV. Consultation and GAPS Analysis
- V. State of Illinois proposed Eligible Activities for HOME-ARP
- VI. Public Comment
- VII. Next Steps



MEETING FORMAT



To comment, please write your **full name** and **organization** in the chat and you will be added to the comment queue.

Comments are limited to two (2) minutes per person

Please note that comments made in the chat are not considered official written comments. To submit a written comment for review, it must be submitted to HOMEARP_PublicComment@ihda.org or to:

Illinois Housing Development Authority
ATTN: Strategic Planning and Reporting / HOME-ARP Feedback
111 East Wacker Drive, Suite 1000
Chicago, Illinois 60601

The public comment deadline is **Thursday, August 18, 2022, at 5:00 PM (CST)**



BACKGROUND & REQUIREMENTS OF HOME-ARP



HOME-ARP Overview

Background

- On March 11, 2021, the **American Rescue Plan (ARP)** was signed into law
 - Provided \$1.9 trillion in relief to address the continued impacts of the Covid-19 pandemic
 - Congress appropriated \$5 billion help communities provide housing, shelter, and services for people experiencing homelessness or at-risk of homelessness and other vulnerable populations
 - Funds are administered by HUD through the HOME Investment Partnership Program
- The State of Illinois received **\$62,083,824** in HOME-ARP funds, with funds available through **September 30, 2030**.

Program Goals

- Invest and finance permanent supportive housing
- Rehabilitate and upgrade existing shelters
- Provide rental assistance and supportive services



HOME-ARP Qualifying Populations

Individuals/Families who are:

1. Homeless
2. At-risk of Homelessness
3. Fleeing or Attempting to Flee Domestic Violence, Dating Violence, Sexual Violence, Stalking or Human Trafficking
4. Part of other populations where providing supportive services or assistance would prevent a family's homelessness or would serve those with the greatest risk of housing instability
5. Veterans and families that include a veteran family member that meet the criteria in any one of the (1-4) above

Links for more information on qualifying populations:

- [HOME-ARP Guidance](#)
- [HOME-ARP Policy Brief: Preferences, Methods of Prioritization, and Limitations](#)



HOME-ARP Eligible Activities

- **Administration and Planning**
- **Affordable Housing:** (i) Rehabilitation of Owner-Occupied Housing, (ii) Assistance to Homebuyers, and (iii) Rehabilitation/construction of new rental housing
- **Acquisition and Development of Non-Congregate Shelter:** Purchase or development for individuals or families experiencing homelessness or fleeing domestic violence, dating violence, sexual violence, stalking or human trafficking
- **Tenant Based Rental Assistance:** Covers rental housing and housing-related costs, such as rental assistance, security deposits, and utility deposits costs for eligible individuals
- **Supportive Services:** Provides a broad range of supportive services to qualifying individuals or families as a separate activity or in combination with other HOME-ARP activities
- **Operating and Capacity Building Assistance**



CONSULTATION AND GAPS ANALYSIS



Consultation Guidance

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

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

State PJs are not required to consult with every PHA or CoC within the state's boundaries



Outreach Methods

- Outreach conducted 2021-2022 via:
 - Phone
 - Email survey
 - Meetings
 - Letters sent to IHDA
- Consulted variety of organizations
 - Continua of Care in Illinois
 - Housing and Housing-Related Service Providers
 - Public Housing Authorities
 - Fair Housing, Policy, and Advocacy Organizations
 - Regional Economic Development Organizations
 - Illinois Participating Jurisdictions
 - State Agencies



Outreach Methods

- Feedback received from **71 organizations**
 - Represent urban, suburban and rural areas of the state
 - Reached out to all Continua of Care and Participating Jurisdictions

Received responses for organizations in all categories and across all regions of the state.
- Responses from many organizations:
 - Continua of Care in Illinois (13 of 19 responded)
 - Housing and Housing-Related Service Providers (10 of 14 responded)
 - Public Housing Authorities (2 of 10 responded)
 - Fair Housing, Policy, and Advocacy Organizations (2 of 10 responded)
 - Regional Economic Development Organizations (5 of 19 responded)
 - Illinois Participating Jurisdictions (13 of 16 responded)
 - State Agencies (3 of 6 participated)
 - Other organizations (CoC partners, etc.) (23 total)



Summary of feedback

- Across all geographies and organization types, feedback identified need for:
 - Development/preservation of affordable housing
 - Particular focus for many organizations on Permanent Supportive Housing
 - Permanent shelter space, after loss/reduction during COVID-19 pandemic
 - Need for supportive services
 - Tenant-based rental assistance was generally ranked as lowest- priority for HOME-ARP



Gap Analysis Methods

- Estimate housing and shelter needs for all qualifying populations
- For homeless population estimates, primarily data sources were
 - 2020 Point in Time Data (data quality concerns with 2021 data)
 - 2021 Housing Inventory Count
 - IHDA production data (Statewide Referral Network, PSH, Section 811)
 - Applied service strategy multipliers to model need/demand
 - Consultation with specialists in emergency housing
- For other qualifying populations, utilized
 - Comprehensive Housing Affordability Strategy (CHAS) tables from the American Community Survey (ACS) Census data,
 - CHAS estimates housing needs, particularly for low-income households, 4 major categories
 - housing unit lacks complete kitchen facilities;
 - housing unit lacks complete plumbing facilities;
 - household is overcrowded; and
 - household is cost burdened.



Estimated Need

Homeless Needs Inventory and Gap Analysis Table

Homeless								
	Current Inventory				Homeless Population		Gap Analysis	
	Family	Adults Only		Vets	Family	Adult HH	Family	
		# of	# of	# of				
	Beds	Units	Beds	Units	least		Beds	Beds
Emergency								
Homeless					34			
Current								

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



Estimated Need

Housing Needs Inventory and Gap Analysis Table

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

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



Estimated Need

- For Homeless population estimated current need/demand at
 - At least **7,990 housing units** (Permanent Supportive Housing, Rapid Rehousing, or Transitional housing)
 - At least **4,640 beds** in emergency shelters.
- For other qualifying populations estimated current need/demand at
 - At least **170,900 affordable housing units.**



Summary

- Needs Analysis demonstrates significant need for additional shelter beds and affordable rental housing
- Supported by feedback and priorities received from consultation with organizations
- Informed recommended HOME-ARP uses included in draft Allocation Plan



STATE OF ILLINOIS PROPOSED ELIGIBLE ACTIVITIES FOR HOME-ARP



Proposed Activities

	Funding Amount	Percent of the Grant	Statutory Limit
Acquisition and Development of Non-Congregate Shelters	\$37,250,294	60%	n/a
Development of Affordable Rental Housing	\$ 15,520,956	25%	n/a
Administration and Planning	\$9,312,574	15%	15%
Total HOME ARP Allocation	\$ 62,083,824		

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



HOME-ARP Production Housing Goals

- 250 non-congregate shelter beds
- 40 units of Permanent Supportive/Transitional/Rapid Rehousing
- Geographic distribution: Statewide



HOME-ARP Preferences

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

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

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

No preferences are established for the **Non-Congregate Shelter** eligible activity

If a Coordinated Entry system partners with a shelter facility, that Coordinated Entry system's preferences or priorities may be applied to the shelter's policies, as long as they also adhere to serve all Qualifying Populations according to HOME-ARP guidance.



PUBLIC COMMENT



To comment, please write your **full name** and **organization** in the chat and you will be added to the comment queue.

Comments are limited to two (2) minutes per person

Please note that comments made in the chat are not considered official written comments. To submit a written comment for review, it must be submitted to HOMEARP_PublicComment@ihda.org or to:

Illinois Housing Development Authority
ATTN: Strategic Planning and Reporting / HOME-ARP Feedback
111 East Wacker Drive, Suite 1000
Chicago, Illinois 60601

The public comment deadline is **Thursday, August 18, 2022, at 5:00 PM (CST)**



NEXT STEPS



Next Steps

- Submit written public comments to: HOMEARP_PublicComment@ihda.org
- Public Comment deadline: **Thursday, August 18, 5:00 PM (CST)**
- IHDA to respond to all public comments in the final HOME-ARP allocation plan submitted to HUD

Liz Kersjes

From: Baker, Lore [REDACTED]
Sent: Wednesday, August 17, 2022 12:48 PM
To: Burton Hughes; Conora Shaw
Subject: [EXTERNAL] HOME-ARP Allocation Plan Comments

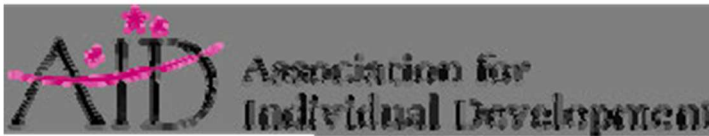
Importance: High

The Elgin Human Services Council (EHSC at www.elgincares.org), made up of non-profits serving the Greater Elgin Area in Illinois and serving thousands of vulnerable Illinoisans yearly, would like to take the opportunity to offer one comment:

1. While we agree that the need for the Development of Affordable Rental Housing is massive, we feel that due to the relatively small proposed allocation towards this activity and the high cost of creating affordable housing at this time, that no HOME-ARP funding should be allocated for the Development of Affordable Rental Housing. **We ask that you consider allotting 85% of the HOME-ARP funds to the Acquisition and Development of Non-Congregate Shelters.** There are generally very few (if any) resources to create non-congregate shelter and there have been (over the last few years) a greater amount of funds available through a variety of federal and state resources targeted at creating affordable housing.

Thank you for the extensive research and work that went into the preparation of the Illinois draft HOME-ARP Allocation Plan and thank you for your consideration of our comments!

Lore Baker
President & CEO





111 E. Wacker Drive
Suite 1000
Chicago, IL 60601
312.836.5200

August 26, 2022

Lore Baker
President & CEO
Association for Individual Development



To Lore Baker:

Thank you for your comment submitted to IHDA regarding the draft HOME-ARP Allocation Plan, on behalf of the Elgin Human Services Council. We at IHDA recognize the deep need statewide for non-congregate shelter development, and the lack of available resources to develop non-congregate shelter.

We have not yet created our RFA (Request for Applications) for the HOME-ARP funding, but we anticipate releasing a HOME-ARP RFA once our HOME-ARP Allocation Plan is approved by HUD. While our Allocation Plan proposes allocating 60 percent of our HOME-ARP funds toward the acquisition and development of non-congregate shelter, it also includes the clarification that "Based on the applications received, these amounts and percentages may fluctuate." This will allow us to reserve the right to adjust the percentage of funding spent on non-congregate shelter and on rental housing, based on applications received. Specific guidance will be further described in any Request for Applications/Proposals for eligible uses of HOME-ARP funds.

Please do not hesitate to contact IHDA with any additional questions.

Sincerely,

Alan Quick
Managing Director, Strategic Planning and Reporting (SPAR)
Illinois Housing Development Authority

Liz Kersjes

From: Doug Kenshol [REDACTED]
Sent: Tuesday, August 16, 2022 4:59 PM
To: Burton Hughes; Conora Shaw
Subject: [EXTERNAL] Public Comments from SSPADS re HOME-ARP Allocation Plan

Hi,

Thank you for providing an opportunity to share written comments regarding IHDA's HOME-ARP Allocation Plan.

We applaud IHDA for prioritizing non-congregate shelter and permanent supportive housing. These resources are desperately needed in the south suburbs of Chicago and throughout the state.

On page 30 where you explain the uses of HOME-ARP, the plan states that \$15.5M will be used for the "development" of affordable rental housing in the form of transitional, rapid rehousing, and PSH housing. So, is RRH-type rental assistance an eligible use? Or just acquisition/rehab/development? We would strongly support the inclusion of scattered-site leasing and rental assistance as eligible uses, in addition to physical real estate development.

On page 29, the draft says the priority will be PSH "and/or mixed with transitional housing." HOME-ARP could be a very effective resource to create transitional housing for homeless families so that they don't need to be in shelter. Would something like that be eligible? What is meant by "mixed"? Would a project need to combine both PSH and transitional housing to be prioritized? We strongly recommend the inclusion of transitional housing and transitional-RRH (like HUD COC-funded TH-RRH) combined projects as eligible uses.

On page 29, the plan indicates that rental housing projects can include capitalized operating reserves. There is also a need for building replacement reserves.

On page 30, the plan specifies an item from the HOME-ARP regs that Non-Congregate shelter applicants need to show sufficient operating funds. While not part of the plan, IHDA assistance is needed to collaborate with IDHS to help coordinate and secure operating assistance where needed. Also, there is a need to be as flexible as the regulations allow in "showing" that there are sufficient operating funds. Private and government grants are issued on a yearly basis. No agency will be able to demonstrate a 10-year commitment of operating funds.

The plan includes \$9 million in admin. What is the intended use? Can applicants request 15% for their own admin in addition to non-congregate shelter or affordable housing funding? We strongly recommend that applicants be provided with administrative funding as part of their projects.

South Suburban PADS is a 501(c)3 not-for-profit organization that is working to prevent and end homelessness in the south suburbs of Chicago. Over the past 31 years, we have provided 600,000 nights of shelter and 1.8 million meals to enable 19,000 people to overcome homelessness. In addition, South Suburban PADS provides pathways home and helps over 400 people to preserve or access affordable rental homes every year. Our work addresses racial inequality by helping people experiencing homelessness (85% minority) to obtain apartments and work to achieve better health and economic security. South Suburban PADS is the proud recipient of the 2018 Bank of America Neighborhood Builders Award and the 2019 National Good Neighbor Award.

Thanks,
Doug

Doug Kenshol
Executive Director



South Suburban PADS



<https://www.sspads.org/>

<https://www.facebook.com/sspads.org/>



August 26, 2022

Doug Kenshol
Executive Director
South Suburban PADS

[REDACTED]
[REDACTED]
[REDACTED]

To Doug Kenshol:

Thank you for your comment submitted to IHDA regarding the draft HOME-ARP Allocation Plan, on behalf of South Suburban PADS. This letter will provide response to your questions and recommendations offered within your comment:

1. *On page 30 where you explain the uses of HOME-ARP, the plan states that \$15.5M will be used for the “development” of affordable rental housing in the form of transitional, rapid rehousing, and PSH housing. So, is RRH-type rental assistance an eligible use? Or just acquisition/rehab/development? We would strongly support the inclusion of scattered-site leasing and rental assistance as eligible uses, in addition to physical real estate development.*

HOME-ARP funds may be used to provide tenant-based rental assistance to qualifying households. However, based on IHDA’s outreach and needs assessment work detailed in our draft HOME-ARP Allocation Plan, IHDA does not propose using HOME-ARP funds for tenant-based rental assistance. IHDA will focus its available funding allocation on acquisition and development of non-congregate shelter, and rental housing. Attached please find the HUD Final HOME-ARP Implementation Notice – see Section VI. Eligible Activities for details on HOME-ARP eligible uses.

2. *On page 29, the draft says the priority will be PSH “and/or mixed with transitional housing.” HOME-ARP could be a very effective resource to create transitional housing for homeless families so that they don’t need to be in shelter. Would something like that be eligible? What is meant by “mixed”? Would a project need to combine both PSH and transitional housing to be prioritized? We strongly recommend the inclusion of*

transitional housing and transitional-RRH (like HUD COC-funded TH-RRH) combined projects as eligible uses.

Transitional housing is an approved path for conversion of non-congregate shelter to permanent affordable housing. The ARP authorizes the conversion of HOME-ARP non-congregate shelter units into permanent housing under subtitle C of title IV of McKinney-Vento or permanent affordable housing as described in the HOME-ARP Implementation Notice during the restricted use period (see page 63 - Conversion of Non-Congregate Shelter to Rental Housing in the attached HUD Final HOME-ARP Implementation Notice). No HOME-ARP funds may be used for conversion.

Eligible HOME-ARP rental housing includes “housing” as defined at 24 CFR 92.2, including but not limited to manufactured housing, single room occupancy (SRO) units, and permanent supportive housing. Emergency shelters, hotels, and motels (including those currently operating as non-congregate shelter), facilities such as nursing homes, residential treatment facilities, correctional facilities, halfway houses, and housing for students or dormitories do not constitute housing in the HOME-ARP program. However, HOME-ARP funds may be used to acquire and rehabilitate such structures into HOME-ARP rental housing. HOME-ARP funds may be used to assist one or more units in a project. Only the eligible development costs of the HOME-ARP units may be charged to the HOME-ARP program. For more details on funding rental housing with HOME-ARP, see page 20 - HOME-ARP Rental Housing in the attached HUD Final HOME-ARP Implementation Notice.

More specific guidance around IHDA’s priorities will be further described in any Request for Applications/Proposals for eligible uses of HOME-ARP funds.

3. *On page 29, the plan indicates that rental housing projects can include capitalized operating reserves. There is also a need for building replacement reserves.*

Per HUD guidance, replacement reserves are considered an eligible cost within the Operating Cost Assistance category for rental housing (see Page 25 of the attached Final HOME-ARP Implementation Notice). HUD uses the following definition for replacement reserves:

“A reserve for replacement must be based on the useful life of each major system and expected replacement cost in a HOME-ARP project. Scheduled payments to a reserve for replacement of major systems included in the operating costs allocated to a HOME-ARP unit restricted for a qualifying household may be made from the operating cost assistance reserve. A reserve for

replacement allocated to the HOME-ARP units may also be capitalized in the initial year of the minimum compliance period of the HOME-ARP units. HOME-ARP funds cannot be used to both capitalize a reserve for replacement and provide payments to the reserve for replacement from a capitalized operating reserve during the minimum compliance period.”

4. *On page 30, the plan specifies an item from the HOME-ARP regs that Non-Congregate shelter applicants need to show sufficient operating funds. While not part of the plan, IHDA assistance is needed to collaborate with IDHS to help coordinate and secure operating assistance where needed. Also, there is a need to be as flexible as the regulations allow in “showing” that there are sufficient operating funds. Private and government grants are issued on a yearly basis. No agency will be able to demonstrate a 10-year commitment of operating funds.*

Per HUD guidance, HOME-ARP funds may not be used to pay any operating costs of a HOME-ARP non-congregate shelter project. IHDA as the participating jurisdiction must consider “whether the HOME-ARP non-congregate shelter project has secured or **has a high likelihood of securing** operating funding because operating costs cannot be paid with HOME-ARP.” (emphasis added – see Page 58 of the attached Final HOME-ARP Implementation Notice). Before awarding funds for HOME-ARP non-congregate shelter, the participating jurisdiction must require the owner to submit a proposed operating budget, including secured sources for operating costs and any operating gap that will require additional assistance. If there is a gap in the operating budget, the participating jurisdiction should require the owner to submit a plan for securing additional private, local, state, or Federal funding sufficient for successful operation of the project.

More specific guidance around IHDA’s requirements for meeting the operating costs threshold will be further described in any Request for Applications/Proposals for eligible uses of HOME-ARP funds.

5. *The plan includes \$9 million in admin. What is the intended use? Can applicants request 15% for their own admin in addition to non-congregate shelter or affordable housing funding? We strongly recommend that applicants be provided with administrative funding as part of their projects.*

Per HUD, the Participating Jurisdiction may expend, for payment of reasonable administrative and planning costs, up to 15 percent of its HOME-ARP allocation. IHDA, as the statewide non-entitlement Participating Jurisdiction for HOME-ARP, has requested 15 percent of the HOME-

ARP allocation to support planning and administration of this funding source through 2030. See Page 18 of the attached Final HOME-ARP Implementation Notice for details on what is included in the administration and planning eligible use.

HUD has regulations specifying the costs eligible for funding with HOME-ARP:

HOME-ARP funds may be used to pay for up to 100% of the following eligible costs associated with the acquisition, development, and operation of HOME-ARP rental units: development hard costs; refinancing; acquisition; related soft costs; relocation costs; costs relating to payment of loans; operating cost assistance. See Page 23 of the attached Final HOME-ARP Implementation Notice for detailed descriptions of each eligible cost.

HOME-ARP funds may be used for actual costs of acquiring non-congregate shelter or developing HOME-ARP non-congregate shelter as follows: acquisition costs; demolition costs; development hard costs; site improvement; related soft costs; replacement reserve. See Page 56 of the attached Final HOME-ARP Implementation Notice for detailed descriptions of each eligible cost.

HOME-ARP funds may be used toward eligible costs for supportive services that are necessary to assist the qualifying populations, prevent homelessness, or to enable qualifying households to obtain and maintain housing. However, based on IHDA's outreach and needs assessment work detailed in our draft HOME-ARP Allocation Plan, IHDA does not propose using HOME-ARP funds for supportive services.

Thank you again for your comments and questions. Please do not hesitate to contact IHDA with any additional questions.

Sincerely,



Alan Quick

Managing Director, Strategic Planning and Reporting (SPAR)
Illinois Housing Development Authority

Needs Assessment and Gaps Analysis

fu accordance with Section V.C.1 of the Notice (page 14), a PJ must evaluate the size and demographic composition of **all four** of the qualifying populations within its boundaries and assess the unmet needs of each of those populations. If the PJ does not evaluate the needs of one of the qualifying populations, then the PJ has not completed their Needs Assessment and Gaps Analysis. fu addition, a PJ must identify any gaps within its cmTent shelter and housing invent01y as well as the service delive1y system. A PJ should use cun-ent data, including point in time com1t, housing invent01y count, or other data available through CoCs, and consultations with service providers to quantify the individuals and families in the qualifying populations and their need for additional housing, shelter, or services.

Homeless Needs Inventory and Gap Analysis Table

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

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

Housing Needs Inventory and Gap Analysis Table

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

State of Illinois Draft HOME-ARP Allocation Plan for Public Comment

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

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

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

Homeless as defined in 24 CFR 91.5

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

At Risk of Homelessness as defined in 24 CFR 91.5

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

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

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

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

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

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

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

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

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

Homeless Populations:

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

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

At Risk of Homelessness:

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

Describe the unmet housing and service needs of qualifying populations:

Homeless as defined in 24 CFR 91.5

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

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

At Risk of Homelessness as defined in 24 CFR 91.5

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

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

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

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

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

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

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

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

At Risk of Homelessness:

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

Currently Homeless:

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

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

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

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

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

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

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

Identify priority needs for qualifying populations:

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

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

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

HOME-ARP Activities

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

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

Rental Housing and Supportive Housing

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

- Funds will be made available competitively statewide.
- Rental housing that meets IHDA's permanent supportive housing definition and/or is mixed with transitional housing units will be prioritized if not required in the RFP.
 - IHDA defines Permanent Supportive Housing as a Project with a preference or restriction for people who need supportive services to access and maintain affordable housing, including households who are experiencing or at risk of homelessness, are living with chronic disabilities, and/or are experiencing or at risk of institutionalization. Supportive services must be appropriate to the needs and preferences of residents and be available either on-site or closely integrated with the housing. The housing should be permanent (not time-limited, not transitional), affordable (typically rent-subsidized or otherwise targeted to extremely-low-income tenants who make $\leq 30\%$ of the area median income), and independent (tenant holds the lease with normal rights and responsibilities). Services should be flexible (responsive to tenants' needs and desires), voluntary (participation is not a condition of tenancy), and sustainable (focus of services is on maintaining housing stability and good health).
- The allocations may include a set-aside, priority, or preference for applications located in an area without a HOME-ARP allocated PJ.
- If Applicants apply for Rental Housing, the RFP may include incentive for the inclusion of on-site services.
- The RFP will prioritize applications that show strong partnerships between developers, service providers, and other key project members through Memoranda of Understanding or other contractual documents.
- Applications may be able to be layered with other local, state, or federal funds.
- Applications may request and be awarded capitalized operating reserves.

Non-Congregate Shelter

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

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

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

Describe whether the PJ will administer eligible activities directly:

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

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

N/A

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

Use of HOME-ARP Funding

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

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

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

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

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

State of Illinois Draft HOME-ARP Allocation Plan for Public Comment

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

HOME-ARP Production Housing Goals

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

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

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

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

Preferences

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Referral Methods

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

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

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

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

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

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

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

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

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

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

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

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

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

Limitations in a HOME-ARP rental housing or NCS project

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

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

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

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

N/A

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

N/A

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

N/A

HOME-ARP Refinancing Guidelines

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

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

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

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

N/A

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

N/A

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

N/A

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

N/A

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

N/A

Application for Federal Assistance SF-424

* 1. Type of Submission:

- ☐ Preapplication
☒ Application
☐ Changed/Corrected Application

* 2. Type of Application:

- ☒ New
☐ Continuation
☐ Revision

* If Revision, select appropriate letter(s):

* Other (Specify):

* 3. Date Received:

4. Applicant Identifier:

5a. Federal Entity Identifier:

5b. Federal Award Identifier:

M21SP170100

State Use Only:

6. Date Received by State:

7. State Application Identifier:

8. APPLICANT INFORMATION:

* a. Legal Name:

State of Illinois

* b. Employer/Taxpayer Identification Number (EIN/TIN):

36-2708817

* c. UEI:

GA8GWCXUDL3

d. Address:

* Street1:

111 E Wacker Drive

Street2:

Suite 1000

* City:

Chicago

County/Parish:

* State:

IL: Illinois

Province:

* Country:

USA: UNITED STATES

* Zip / Postal Code:

60601-4306

e. Organizational Unit:

Department Name:

IL Housing Development Auth.

Division Name:

Multi-family Financing

f. Name and contact information of person to be contacted on matters involving this application:

Prefix:

Ms.

* First Name:

Christine

Middle Name:

* Last Name:

Moran

Suffix:

Title:

Managing Director, Multi-family Financing

Organizational Affiliation:

Illinois Housing Development Authority

* Telephone Number:

872-271-8212

Fax Number:

312-832-2167

* Email:

cmoran@ihda.org

Application for Federal Assistance SF-424

* 9. Type of Applicant 1: Select Applicant Type:

A: State Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

* Other (specify):

* 10. Name of Federal Agency:

U.S. Department of Housing and Urban Development

11. Catalog of Federal Domestic Assistance Number:

14.239

CFDA Title:

HOME Investments Partnership Program

* 12. Funding Opportunity Number:

M21SP170100

* Title:

HOME Investments Partnership Program-American Rescue Plan (HOME-ARP)

13. Competition Identification Number:

Not applicable

Title:

Not applicable

14. Areas Affected by Project (Cities, Counties, States, etc.):

Add Attachment

Delete Attachment

View Attachment

* 15. Descriptive Title of Applicant's Project:

State of Illinois 2021 Action Plan - HOME-ARP Allocation Plan

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments

Application for Federal Assistance SF-424**16. Congressional Districts Of:**

* a. Applicant

All

* b. Program/Project

Attach an additional list of Program/Project Congressional Districts if needed.

Add Attachment

Delete Attachment

View Attachment

17. Proposed Project:

* a. Start Date:

09/20/2021

* b. End Date:

09/30/2030

18. Estimated Funding (\$):

* a. Federal

62,083,824.00

* b. Applicant

* c. State

* d. Local

* e. Other

* f. Program Income

* g. TOTAL

62,083,824.00

*** 19. Is Application Subject to Review By State Under Executive Order 12372 Process?**☐ a. This application was made available to the State under the Executive Order 12372 Process for review on☐ b. Program is subject to E.O. 12372 but has not been selected by the State for review.☒ c. Program is not covered by E.O. 12372.*** 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**☐ Yes☒ No

If "Yes", provide explanation and attach

Add Attachment

Delete Attachment

View 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)**

☒ ** 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:

Ms.

* First Name:

Kristin

Middle Name:

* Last Name:

Faust

Suffix:

* Title:

Executive Director, IL Hsg. Development Auth.

* Telephone Number:

872-271-8092

Fax Number:

312-832-2170

* Email:

kfaust@ihda.org

* Signature of Authorized Representative:

* Date Signed:

08/26/2022

ASSURANCES - NON-CONSTRUCTION PROGRAMS

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0040), Washington, DC 20503.

PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.

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As the duly authorized representative of the applicant, I certify that the applicant:

1. Has the legal authority to apply for Federal assistance and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project cost) to ensure proper planning, management and completion of the project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, through any authorized representative, access to and the right to examine all records, books, papers, or documents related to the award; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
4. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
5. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards for merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
6. Will comply with all Federal statutes relating to nondiscrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1681-1683, and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. §794), which prohibits discrimination on the basis of handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended, relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290 dd-3 and 290 ee- 3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and, (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.
7. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal or federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
8. Will comply, as applicable, with provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.

9. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333), regarding labor standards for federally-assisted construction subagreements.
10. Will comply, if applicable, with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
11. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) Implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
12. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
13. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq.).
14. Will comply with P.L. 93-348 regarding the protection of human subjects involved in research, development, and related activities supported by this award of assistance.
15. Will comply with the Laboratory Animal Welfare Act of 1966 (P.L. 89-544, as amended, 7 U.S.C. §§2131 et seq.) pertaining to the care, handling, and treatment of warm blooded animals held for research, teaching, or other activities supported by this award of assistance.
16. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
17. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
18. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
19. Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL <div style="border: 1px solid black; height: 40px; width: 100%; background-color: yellow;"></div>	TITLE <div style="border: 1px solid black; padding: 2px;">Exec. Dir., Illinois Hsg. Develop. Authority</div>
APPLICANT ORGANIZATION <div style="border: 1px solid black; padding: 2px;">Illinois Housing Development Authority</div>	DATE SUBMITTED <div style="border: 1px solid black; padding: 2px;">8/29/2022</div>

ASSURANCES - CONSTRUCTION PROGRAMS

OMB Number: 4040-0009
Expiration Date: 02/28/2025

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0042), Washington, DC 20503.


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As the duly authorized representative of the applicant:, I certify that the applicant:

1. Has the legal authority to apply for Federal assistance, and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project costs) to ensure proper planning, management and completion of project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, the right to examine all records, books, papers, or documents related to the assistance; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will not dispose of, modify the use of, or change the terms of the real property title or other interest in the site and facilities without permission and instructions from the awarding agency. Will record the Federal awarding agency directives and will include a covenant in the title of real property acquired in whole or in part with Federal assistance funds to assure non-discrimination during the useful life of the project.
4. Will comply with the requirements of the assistance awarding agency with regard to the drafting, review and approval of construction plans and specifications.
5. Will provide and maintain competent and adequate engineering supervision at the construction site to ensure that the complete work conforms with the approved plans and specifications and will furnish progressive reports and such other information as may be required by the assistance awarding agency or State.
6. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
7. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
8. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards of merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
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15. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
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18. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
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SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL 	TITLE Executive Director, IL Hsg. Development Auth.
APPLICANT ORGANIZATION Illinois Housing Development Authority	DATE SUBMITTED 08/26/2022

HOME-ARP CERTIFICATIONS

In accordance with the applicable statutes and the regulations governing the consolidated plan regulations, the participating jurisdiction certifies that:

Affirmatively Further Fair Housing --The jurisdiction will affirmatively further fair housing pursuant to 24 CFR 5.151 and 5.152.

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 will comply with the acquisition and relocation requirements contained in the HOME-ARP Notice, including the revised one-for-one replacement requirements. It has in effect and is following a residential anti-displacement and relocation assistance plan required under 24 CFR Part 42, which incorporates the requirements of the HOME-ARP Notice. It will follow its residential anti-displacement and relocation assistance plan in connection with any activity assisted with funding under the HOME-ARP program.

Anti-Lobbying --To the best of the jurisdiction'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 paragraph 1 and 2 of this anti-lobbying 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 Jurisdiction --The consolidated plan is authorized under State and local law (as applicable) and the jurisdiction possesses the legal authority to carry out the programs for which it is seeking funding, in accordance with applicable HUD regulations and program requirements.

Section 3 --It will comply with section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701u) and implementing regulations at 24 CFR Part 75.

HOME-ARP Certification --It will use HOME-ARP funds consistent with Section 3205 of the American Rescue Plan Act of 2021 (P.L. 117-2) and the CPD Notice: *Requirements for the Use of Funds in the HOME-American Rescue Plan Program*, as may be amended by HUD, for eligible activities and costs, including the HOME-ARP Notice requirements that activities are consistent with its accepted HOME-ARP allocation plan and that HOME-ARP funds will not be used for prohibited activities or costs, as described in the HOME-ARP Notice.

Signature of Authorized Official

8/26/2022
Date

Executive Director, IHDA
Title