## **HOME-ARP Allocation Plan Template**

## Guidance

- To receive its HOME-ARP allocation, a PJ must:
  - o Engage in consultation with at least the required organizations;
  - o Provide for public participation including a 15-day public comment period and one public hearing, at a minimum; and,
  - o Develop a plan that meets the requirements in the HOME-ARP Notice.
- To submit: a PJ must upload a Microsoft Word or PDF version of the plan in IDIS as an attachment next to the "HOME-ARP allocation plan" option on either the AD-26 screen (for PJs whose FY 2021 annual action plan is a Year 2-5 annual action plan) or the AD-25 screen (for PJs whose FY 2021 annual action plan is a Year 1 annual action plan that is part of the 2021 consolidated plan).
- PJs must also submit an SF-424, SF-424B, and SF-424D, and the following certifications as an attachment on either the AD-26 or AD-25 screen, as applicable:
  - o Affirmatively Further Fair Housing;
  - Uniform Relocation Assistance and Real Property Acquisition Policies Act and Anti-displacement and Relocation Assistance Plan;
  - o Anti-Lobbying;
  - Authority of Jurisdiction;
  - o Section 3; and,
  - o HOME-ARP specific certification.

Participating Jurisdiction: Peoria, Illinois Date: 12/27/2022.

#### Consultation

Before developing its plan, a PJ must consult with the CoC(s) serving the jurisdiction's geographic area, homeless and 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, at a minimum. 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.

### Summarize the consultation process:

The City of Peoria implemented a comprehensive strategy to consult with each of the required agencies and service providers to ensure that information was obtained from and regarding all qualifying populations that could be served through this funding. City staff attended established networking meetings hosted throughout the month of March and April 2022; including the Continuum of Care, CoC Governing Board, Strategy Committee, Peoria Housing Authority, and

HOPE Network Roundtable. These networking meetings host a collaborative setting on a monthly basis; and include homeless service providers, public agencies, victim service providers, veterans' assistance, and organizations serving and advocating for fair housing/civil rights/and those with disabilities. Additional follow up was conducted with organizations that provide direct service to the qualifying populations. The survey was administered in an electronic format for those meetings being held virtually, and utilized for discussion at those meetings where individual providers were meeting face-to-face. Information captured from service providers, Peoria Housing Authority, the Continuum of Care, and members of the qualifying populations was comparable to one another and utilized in the gaps analysis for this Allocation Plan. Consistently, when asked a series of yes/no questions, providers answered that there was not enough supportive services to assist in finding AND maintaining stable housing, that our community does not have enough housing units that are affordable regardless of household's source of income, and that there was a need for more accessible housing in the community with permanent supports for those with physical and mental health needs.

## List the organizations consulted, and summarize the feedback received from these entities.

Agency/Org Consulted	Type of Agency/Org	Method of Consultation	Feedback
Continuum of Care General Membership	CoC, Homeless Service Providers, Victims Services Providers, Veterans Group  QP- Homeless, At Risk of Homeless, Fleeing Domestic Violence, Veterans, Other Populations	Online Survey completed during virtual General Membership meeting with discussion	Providers present for the monthly meeting included veterans services, homeless service providers, harm reduction services, senior care, community health providers, housing authority and violence prevention services. Those present were both funded and non-funded nonprofit community providers. The greatest need experienced within the survey data is a lack of housing, particularly that which is affordable. The housing available is expensive for those being served, resulting in a need for affordable housing options and/or increases in client income. More housing of the appropriate cost is needed for both families and individuals.
JOLT Harm Reduction	Homeless Service Provider	In-Person Survey Completed As Group Discussion	The services provided serve a wide variety of people, anyone impacted by substances and in need of services. The most prominent housing-related

	QPs- Homeless, At Risk of Homeless, Other Populations		struggle continues to to be the limited capacity to serve sex offenders within the shelters, and the sheltercare experience is currently communal- a noncongregate setting would be more appropriate for LGBT individuals, young adults, and the dignity of individuals seeking services.
Regional Office of Education	Public Agency  QPs – Other Populations	In-Person Survey Completed as Group Discussion	The Regional Office has case managers tasked with providing services for students eligible for McKinney-Vento as well as those flagged as chronically truant, many of times these are co-occurring. The number of students being served through these programs is 252 within the jurisdiction of this PJ. The largest need seen by this case management team is housing and the income to support monthly housing costs. More case managers are needed to help connect these families with resources in the area and to collect more information on the resources accessed.
HOPE Network Roundtable	Homeless Service Providers, Victim Services Providers, VA Service Providers, Elderly and Youth Services Providers, Nonprofit Legal Assistance QPs - Homeless, At Risk of Homeless, Fleeing Domestic Violence, Veterans, Other Populations	In-Person Survey Completed as Group Discussion	The largest gaps in community services identified by the service providers in the room were childcare, mental health services, lack of low barrier housing, and the condition of the current housing that was affordable for families along with the lack thereof. Examples were cited of families having trouble obtaining appropriate housing initially, and then the difficulties of accessing appropriate services and maintaining housing; with many families struggling not to return to homelessness. Many in the room suggested rehabilitating current housing stock and vacant buildings rather than building new. More housing opportunities that are affordable for mid-size and large

			families with supportive services are needed.
Phoenix Community Development Services	Homeless Service Provider-  QPs - Homeless, At Risk of Homeless, Veterans, Other Populations	Presentation alongside Continuum of Care	The fastest growing homeless population within the local Continuum is youth and young adults. There is a lack of sheltercare that is appropriate for the population, and a lack of affordable and supportive housing to meet the needs of this population. More permanent supportive services and housing for families is also needed, families are hardest to serve sustainably with the current resources available only providing short-medium term rental assistance.
The Salvation Army	Homeless Service Provider- Serves QPs  QPs - Homeless, At Risk of Homeless, Veterans, Other Populations	In-Person Survey with Staff	This service provider communicates with housing navigation staff at the City and the Continuum of Care weekly to discuss the housing needs of their clients and the availability of appropriate units within the sheltercare maximum stay of 90 days. More housing is needed that can accommodate mid to large size families that is of the appropriate size and also affordable at 40-60% of the area income. The housing that is of appropriate size is either aging, utility inefficient/in need of physical upgrade, or in areas that do no have the appropriate educational services for the family.
Peoria Housing Authority	Public Housing Agency  QPs - Homeless, At Risk of Homeless, Other Populations	Survey completed with director level staff over the phone	The needs and feedback most often received from voucher holders or new voucher recipients is the lack of housing options that will accept HCV. Upon a family's acceptance into a unit, the lack of supportive services within the community are related to mental healthcare access and financial literacy for further housing opportunities. More education is needed for landlords and property developers around source of income protections and a willingness

			to work with those receiving		
			assistance.		
COVID-	Homeless	Survey completed at	The needs expressed by this group of		
Prioritization	Service	the weekly provider	housing service providers most		
Call	Providers, Victim Services	call-in over the phone	frequently is the need for income- based housing for individuals and		
	Providers,		families with housing barriers and		
	Veterans'		little to no income. There are long		
	Group		applications and waiting lists for		
	Group		these apartment complexes, and the		
	QPs -		housing quality is very minimal.		
	Homeless, At		More/additional units of quality		
	Risk of		housing with a preference for renting		
	Homeless,		to individuals without income is		
	Fleeing		needed.		
	Domestic		needed.		
	Violence,				
	Veterans, Other				
	Populations				
	•				
Prairie State Legal	Fair Housing and	Survey via email, in	PSLS administers grants and services in		
Services (PSLS)	Civil Rights	person survey	the following areas: Eviction Court,		
	OD	completed with	Habitability, public housing benefits,		
	QPs -	program staff	housing accessibility and fair housing,		
	Homeless, At Risk of		and an R3 Outreach grant. The largest barriers to services are related to		
			assisting clients with follow through on		
	Homeless,		paperwork and the resources available		
	Fleeing		for those experiencing issues with		
	Domestic		current housing and alternative options		
	Violence,		for situational improvement. More		
	Veterans, Other		appropriate and affordable housing is		
	Populations		needed along with resources to identify		
			these properties, and additional		
			permanent supportive housing is needed		
			for families to be proactive and		
			preventative of eviction and barriers to services.		
			SCI VICES.		

Department of Human Services (SNAP, WIC, TANF)	Public Services  QPs - Homeless, At Risk of Homeless, Veterans, Other Populations	Phone Consultation	1,500 families are being served through the TANF Program in Peoria County; a time-sensitive assistance program for head of households with at least one dependent. Intensive case management services are provided at an annual review per family. More case managers are needed to track the resources needed and ability to stabilize during a family's time on the program. Financial assistance is issued to each participating family one time per month, but there are not enough affordable family housing units for this money to do more than pay housing expenses. Mental health services are mentioned during case management, but the structure is not place to remove stigma and provide successful referrals.
Department of Veterans' Affairs	Veterans' Services  QPs - Veterans	Phone Call Consultation	The veterans served through homeless service provision face barriers to housing that include a lack of affordable housing that the veteran/family can sustain on their own, the need for additional case managers and support for those in housing, and appropriate housing for those being served that have housing barriers such as criminal background. The veterans being served are usually individuals experiencing homelessness and/or in need of supportive services to prevent homelessness. More communal-based settings and veteran/barrier friendly housing complexes are needed to provide daily living support, group-peer support, and supportive housing for stable living and working towards eliminating co-occurring issues such as substance abuse and mental health.

Center for Prevention of Abuse	Victims Services  QPs - Homeless, At Risk of Homeless, Fleeing Domestic Violence, Veterans, Other Populations	Survey via email, in- person meeting held with director and program level staff	The family shelter for those fleeing from domestic violence served 339 individuals within the most recent reporting quarter, and 30% of those were children, 84% of those being served were families. Of those served, the qualifying population that they would identify with was families, experiencing homelessness, and those in need of supportive services that were LMI. The most prominent issue faced by the shelter is assisting their families in securing housing and income that is sustainable and can support independence, with the desire to provide support to ensure that families stabilize and are less likely to return to their abuser. More staff are needed to link these clients with supportive services within the community such as housing and childcare programming.		
Advocates for Access	Public Services, needs of those with disabilities  QPs – Other Populations	In-Person meeting held with direct service professionals	Finding accessible housing for individuals needing physical modifications is nearly impossible in the current housing stock. There have been numerous units that would have been in the appropriate neighborhood and price range for the individuals seeking housing, but the landlord is not willing to make the physical modifications for a ramp, lift, or widening doors (for example). Apartment complexes have a minimum number of accessible units, but oftentimes have waiting lists. More accessible housing and programs that would assist with grants and incentives for landlords to modify properties that could fit the needs of those discharging from therapy with physical needs.		

PFLAG Peoria	Civil Rights, Unaccompanied Youth  QPs - Homeless, At Risk of Homeless, Other Populations	In-Person meeting held with nonprofit board and volunteers	PFLAG Peoria is a resource nonprofit of volunteers serving families with LGBT youth and meeting the needs of individuals, youth and families within the Central Illinois area. PFLAG has partnered with a local therapist to ensure that youth and families struggling with LGBT identity have a resource of support for the entire family, but they would like to do additional outreach with other community services to incorporate more youth who do not have family support. More services particular to housing need to be available to unaccompanied LGBT youth and young adults ages 18-24. There currently is not housing that is appropriate and affordable with supportive services for these young adults, and sheltercare congregate settings are not safe for individuals and youth identifying as LGBT. Additional work and safe living need to be available for all individuals
			individuals and youth identifying as

Goodwill Industries	Veterans' Services, Public Agency  QPs - Homeless, At Risk of Homeless, Veterans, Other Populations	In-Person meeting held with direct service professionals	Goodwill provides services for youth, veterans, and individuals seeking employment. Of the individuals served in a calendar year, 280 were homeless 50% were veterans, 20% were in a family group, 70 were youth ages 10-17, and an additional 50 were ages 16-24 in a separate program. Finding affordable housing appropriate for each age and program group was expressed as a struggle for all direct service professionals present. Much of this correlated to the need for those being served to have additional income to be able to sustain rent at the current prices. More wraparound services are needed for individuals to seek housing that is appropriate, more units available to meet this need for moderate income families are needed, and additional services to be maintained once a family is in housing to stabilize their resources.
PCCEO	Public Service Agency QPs - At Risk of Homeless, Other Populations	Survey Via Email, Responses from Various Departments	The individuals and services provided are open to the public, but primarily serve families and their children through Head Start, and those who are LMI. Everyone seeking services must qualify through income and specific program eligibility. Assistance provided worked to stabilize individuals in their home through homeless prevention and basic needs assistance or to provide rental assistance for those experiencing homelessness, but staff found it difficult to provide sustainable services and resources for the families seeking help. More housing of the appropriate cost and an increase in wages or employment opportunities were stated as the largest needs across all program staff surveyed.

METEC Resource	Civil Rights, Fair	In-Person meeting held	METEC Resource Center provides credit
Center	Housing	with direct service	and financial counseling for individuals and
		professionals	families to stabilize their housing situation.
	QPs - At Risk		Of the clients they serve, there
	of Homeless,		consistently is not enough affordable
	Other		housing available in the community for
	Populations		moderate income or single parent
			households. Housing is a fundamental
	right and choice all should have, and		
			additional resources need to be made
			available in the community and supportive
			housing for people to access those
			resources. Multiple staff within the
			agency stated how difficult it was to help
			people move their life into a stable path
			when their current housing situation was
			unaffordable or unstable.

# **Public Participation**

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.

For the purposes of HOME-ARP, PJs are required to make the following information available to the public:

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

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:

- Public comment period: start date 5/19/2022 end date 6/18/2022
- Public hearing: 5/25 and 26/2022

The HOME ARP Allocation Plan was made available for public review and comment from Thursday May 19<sup>th</sup> through Saturday June 18<sup>th</sup>. Copies of the Allocation Plan were available for review at the following locations:

- -Peoria City Hall, 419 Fulton Street Peoria IL 61602, Development Center Room 203
- -City of Peoria website

Two (2) public hearings were held to discuss the draft of the Allocation Plan on:

- -Wednesday, May 25<sup>th</sup> at 10am in City Hall Room 404 at 419 Fulton Street Peoria 61602
- -Thursday, May  $26^{th}$  at 5:30pm at the Lincoln Branch of the Peoria Public Library, 1312 W Lincoln Avenue Peoria 61605

## Describe any efforts to broaden public participation:

The City of Peoria's citizen participation process was a robust and strong effort to engage the public on the needs of the City of Peoria and was based upon the City's adopted Citizen Participation Plan. Media contacts were notified of the public hearings, and the public comment period and hearing allowed the public to comment on the development of this plan.

The plan was also presented in front of the Housing Commission, which is a citizen commission of the City of Peoria made up of individuals from a variety of backgrounds with an interest in housing in the City of Peoria.

A PJ must consider any comments or views of residents received in writing, or orally at a public hearing, when preparing the HOME-ARP allocation plan.

# Summarize the comments and recommendations received through the public participation process:

A letter of support for the plan and recommendations from the Home For All Continuum of Care was received.

Summarize any comments or recommendations not accepted and state the reasons why: No comments were not accepted

# **Needs Assessment and Gaps Analysis**

PJs must evaluate the size and demographic composition of qualifying populations within its boundaries and assess the unmet needs of those populations. In addition, a PJ must identify any gaps within its current shelter and housing inventory as well as the service delivery system. A PJ should use current data, including point in time count, housing inventory count, or other data available through CoCs, and consultations with service providers to quantify the individuals and

families in the qualifying populations and their need for additional housing, shelter, or services. The PJ may use the optional tables provided below and/or attach additional data tables to this template.

**OPTIONAL Homeless Needs Inventory and Gap Analysis Table** 

Homeless													
	<b>Current Inventory</b>				Homeless Population			Gap Analysis					
	Fan	nily	Adults	s Only	Vets	Family	Adult			Fan	nily	Adult	s Only
	# of Beds	# of Units	# of Beds	# of Units	# of Beds	HH (at least 1 child)	HH (w/o child)	Vets	Victims of DV	# of Beds	# of Units	# of Beds	# of Units
Emergency Shelter	158	33	259	NA	10								
Transitional Housing	0	0	33	NA	6								
Permanent Supportive Housing	161	44	187	NA	64								
Other Permanent Housing						0	16	8	2				
Sheltered Homeless						18	148	9	28				
Unsheltered Homeless						0	36	3	0				
Current Gap										-140	NA	-80	NA

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

**OPTIONAL Housing Needs Inventory and Gap Analysis Table** 

Non-Homeless							
Current Inventory Level of Need Gap A							
	# of Units	# of Households	# of Households				
Total Rental Units	6,196						
Rental Units Affordable to HH at 30% AMI (At-Risk of Homelessness)	3,742						
Rental Units Affordable to HH at 50% AMI (Other Populations)	2,045						
0%-30% AMI Renter HH w/ 1 or more severe housing problems (At-Risk of Homelessness)		4,455					
30%-50% AMI Renter HH w/ 1 or more severe housing problems (Other Populations)		2,615					
Current Gaps			1,283				

**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:

The data source used to report the information about each qualifying population is the Continuum of Care Coordinated Entry system Annual Performance Review. There are 658 individuals reported as experiencing homelessness, with an additional 122 families with children reporting as homeless, 57 of these individuals/head of households identified as Veterans. Specific to additional qualifying populations, our Center for Prevention of Abuse reports serving 339 individuals in the 2021 calendar year, 109 of those were children under the age of 18. Unaccompanied youth are not tracked actively at this time by any particular service partner, but the Regional Office of Education has been working with 252 school age children who are having issues with truancy due to housing instability. Homeless prevention services are available within the community as well, and accessible to individuals and families once per month; in addition to court-based rental assistance. Under thirty (30) families have qualified and been assisted by the prevention services. Additional data on populations at risk of homelessness was obtained during the consultation process, with public service agencies serving individuals through eviction and foreclure prevention, school-family services, and through TANF. The count may be duplicated, so at average those at risk of homelessness could be quantified at 835. This does not include those currently housed with severe housing cost burden or significant issues within their home that may not seek services. Of those served and identified within Coordinated Entry, 415 are male and 506 are female (adults), 28% are between the ages of 18-34 and 37% are between the ages of 35-61 and 20% are under the age of 18, 49% identify as white and 41% identify as black and 9% identifying as multiple races, and 57% of those within CE for this period of time were suffering with 1 or more physical or mental conditions that were impacting their housing stability.

# Describe the unmet housing and service needs of qualifying populations, including but not limited to:

- Sheltered and unsheltered homeless populations;
- Those currently housed populations at risk of homelessness;
- Other families requiring services or housing assistance or to prevent homelessness; and,
- Those at greatest risk of housing instability or in unstable housing situations:

According to the National Alliance to End Homelessness' Family Homelessness Snapshop tool, based off of 2019 PIT counts for reporting Continuums, Peoria has a 148% capacity to serve individuals and families in need of temporary shelter. When utilizing this same snapshot tool, the capacity to meet the housing need of this same population subset is at a -52% capacity; indicating a lack of available units for those seeking permanent housing despite an increase in funding availability from federal, state and local sources. While there is sheltercare available for households of all compositions and sizes, many of those remaining unsheltered are making the concscious choice to do so, and for a variety of speculated reasons during the consultation process. Sheltercare service providers, veterans service providers, and domestic violence service providers continue to operate without enough staffing resources to provide for the growing needs of an increasing homeless population. The available housing within the community that is safe,

decent, affordable and free of City violations does not match the current needs of the homeless and unsheltered populations the Continuum prioritizes to serve. Other families in need of services or whom are unstabily housed face similar barriers to those that are in sheltercare; they are evaluating the same inadequate housing stock available and determining what is most reasonable for long-term stability. In many cases, these families do not qualify for services being provided because they are still housed at the time that the referral is being made. When resources were available in the community for homeless prevention, there were less than 30 families completing the referral process and receiving services. Informatian and resources are available for homeowners to make improvements to their property, and the local Community Action Agency has assistance funding for both LIHEAP and rental arrears, but those most at-risk of homelessness are predominantly in non-owner occupied properties or they are doubled-up. Neither of these two groups would qualify for services available in the community, and without financial assistance and affordable units available within the community, they will likely remain unstabily housed or unaccounted for.

# 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:

The Continuum of Care coordinates the majority of resources within the community that serve the qualifying populations. Shelters exist for all of the qualifying populations that are experiencing homelessness, though only one of these resources is a non-congregate facility. Each shelter is staffed by a case management team to assist those in shelter with employment applications, housing resources such as applications for income-based housing, and connections to healthcare and mental health services. Specific locations within Peoria and Pekin serve those who are fleeing or experiencing domestic violence, and these facilities offer non-congregate shelter units and additional service and case management specific to domestic violence resources and needs. The Children's Home of Peoria has residential facilities, resources and school liasons for unaccompanied youth. TBRA is not available in this area, all individuals and families residing or interacting with shelter staff and homeless outreach liasions complete the Coordinated Entry process to assist with scoring and access to resources such as permanent supportive housing and Rapid ReHousing. The Coordinated Entry process also has a divergent tool to screen those at risk of homelessness for additional resources to assist with rental arrears. Those who are facing the risk of homelessness can also access community resources through various nonprofits in the region through 211, a resource site both online and 24/7 via phone. Resources could include assistance with rent and utilities, transportation, and access to public resources such as SNAP, TANF and WIC. As stated previously, while there are case managers and additional supportive services staff needed in the service sector; the staff that are assisting with resources noted throughout the consultation process and within their networks that supportive housing resources have long waiting lists and do not see a lot of current residents moving-on to allow new applicants and households an opportunity for the needed supportive and/or affordable housing. The deficit in affordable housing stock identified within the gaps analysis chart above is the variance between the number of affordable units within the community in comparison to the number of units that are having issues with housing as reported

in the American Community Survey. All providers throughout the consultation process cited a lack of desirable and affordable housing for individuals and families, and long waiting lists and applications for subsidized housing that could otherwise be appropriate.

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

As stated above, there are enough shelter units for those that are counted through the Point In Time (PIT) count. The non-congregate facilities in the area are limited, and are located specifically within the shelters that are serving families with children under the age of 18. These facilities also place a time limit on those that are occupying the units, this can oftentimes not be enough time for a family to stabilize their income situation and other factors that impacted their homelessness at the time they entered into shelter. Additional space within the current shelter system has been identified as a need through the consultation process to reduce crowding and prevent the spread of illness such as COVID-19. Additional individuals and families not captured in the PIT count but that are within the Coordinated Entry system are staying with family and friends, or do not access additional services on a regular basis. Gaps exist within the current service delivery system to engage the families and individuals that are not within sheltercare or not deemed through the VISPDAT scoring to be the most at-risk. The individuals that are not being activily served by an agency within the Continuum will oftentimes find other resources in the community, or become the portion of the population that is unstabily housed and/or "doubled up." The current resources available to serve individuals and families that are at or 30% or below AMI are not the long-term support oftentimes needed, additional case management support to ensure these families can obtain and remain stabily housed could be crucial for their success. Resources to ensure that services are being provided in an equitable and accessible way will continue to be needed to ensure that the City and community providers are reaching those with the most need and disparately impacted by the current service delivery system. All those consulted with echoed the need for additional staff to provide follow up care for those housed from homelessness, and that a Rapid Rehousing model was not enough time for someone to succeed long-term.

# Identify the characteristics of housing associated with instability and an increased risk of homelessness if the PJ will include such conditions in its definition of "other populations" as established in the HOME-ARP Notice:

The City of Peoria HOME ARP Allocation Plan will be prioritizing those experiencing homelessness as reflected in Category 1 of the Coordinated Entry system already being utilized by service providers. It is most likely that the scope of the project will be filled with those individuals and families within Category 1, and unlikely then to serve the "other populations" as established in the notice. The primary characteristic of housing associated with instability is cost burden to income on a monthly basis. Additional characteristics include the age of the home being occupied or rented, the size of the unit appropriate for the family, and mobility and access to appropriate services. The housing stock in the City of Peoria is aging, and these homes are associated with higher maintenance and utility costs. An average of 75% of families including

both owner-occupied and rented have non-family members staying with them according to the American Community Survey for Peoria County.

## Identify priority needs for qualifying populations:

The priority needs for qualifying populations were identified within statistical information through Coordinated Entry, 2021 Housing Inventory County for the Continuum of Care, and anecdotal information received through the Consultation process for this Allocation Plan. Homeless service providers and the Continuum of Care consistently stated the need for additional Permanent Supportive Housing units for those being served through Coordinated Entry. Current interventions available through other funding sources such as Rapid ReHousing do not allow for the long-term needs of the most vulnerable to be met; causing higher rates of returns to homelessness after as little as 30 days when assistance pledges cease from other funding sources. This is not only due to lack of affordability, but also a lack of capacity to provide housing support and mental health services once an individual or family is housed. The lack of affordable and income-based units available for rent in the region prevents individuals and families from moving out of sheltercare due to an innabilty to sustain the cost burden of housing and maintenance. Much of the housing that is available and affordable is not within proximity of necessary services such as gasoline, grocery and desirable school districts for families with children. Housing stock that can meet these criteria for families are concentrated within high-poverty census tracts and are generally much older; leading to higher utility costs and needed infrastructure improvements. The lack of availability of affordable, supportive, appropriate housing prevents families from stabilizing their housing for their family in a longterm capacity, causes youth and others to seek additional services or never interact with any assistance/housing agencies, and additional QP's will not be able to move out of their supportive housing environments when they are ready if there are not additional housing options available.

# Explain how the level of need and gaps in its shelter and housing inventory and service delivery systems based on the data presented in the plan were determined:

The data representing current shelter capacity and housing inventory were determined through the 2021 Point in Time and Housing Inventory Count for the region, including both the inventory of shelter beds for individuals, shelter units for families, and permanent supportive housing and Rapid ReHousing housing options available. Additional housing inventory system information was gained through the most recent CHAS data reporting period and anecdotal information from the Continuum of Care Home for All initiative. Consultation information and data, particularly from the Continuum of Care and homeless service providers, identified the need for additional affordable and supportive family units as the largest unmet need within their service systems. For a single adult head of household making 50% AMI, their housing cost for affordability cannot exceed \$930/month, and this does not consider the size of the family or their desired housing area or size of unit. Inventory data tabulated on a weekly basis among landlords willing to work with service providing programs and their clients only identified two (2) such units of feasibility per month for a family of size and the highlighted income. There are more families being tracked through Coordinated Entry than those staying in shelter, elevating the level of need for family housing.

Housing Inventory data was compiled from sources including the American Community Survey, City of Peoria annual rental registration (2020- due to pandemic waivers for registrations through 2022) and affordablehousingonline.com. The discrepancy between the number of rental units available that are registered with the City is that units zoned and registered as multifamily do not have to indicate how many units are within the building, and the registration system utilized within this PJ is self-reporting.

## **HOME-ARP** Activities

Describe the method for soliciting applications for funding and/or selecting developers, service providers, subrecipients and/or contractors and whether the PJ will administer eligible activities directly:

This PJ administered a Request for Funding Proposals (RFP) for development of affordable rental housing with a preference to any applicants prioritizing individuals and families experiencing homelessness as defined by HOME ARP funding. Our PJ will not administer any eligible activities directly.

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

Not Applicable.

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. The following table may be used to meet this requirement.

## **Use of HOME-ARP Funding**

	Funding Amount	Percent of the Grant	Statutory Limit
Supportive Services	\$#		
Acquisition and Development of Non- Congregate Shelters	\$ #		
Tenant Based Rental Assistance (TBRA)	\$#		
Development of Affordable Rental Housing	\$ 2,045,017.00		
Non-Profit Operating	\$#	# %	5%
Non-Profit Capacity Building	\$#	# %	5%
Administration and Planning	\$ 360,885.00	15 %	15%
<b>Total HOME ARP Allocation</b>	\$ 2,405,902.00		

## Additional narrative, if applicable:

The funds for our PJ wil be focused upon the development of affordable rental housing and the demonstrating the ability to do so and serve all qualifying populations, with additional preference for projects serving the homeless qualifying population.

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:

Funding priorities and preferences for this RFP are based upon consultation anectdotal and statistical data as well as the housing inventory data identified in the needs/gaps analysis portion of this plan. The list of qualifying populations utilized for this funding has not impacted the need to prioritize housing for families experiencing homelessness. A lack of housing inventory for families that are staying within shelter along with resources to assist them with stabilizing their households after exit has presented ongoing frustrations, expressed throughout consultations with service providers throughout the area. Shelter inventory indicates that there are enough temporary shelter beds for families, but also emphasizes that without additional supports there will be a high rate of return to sheltercare or families meeting the definition of homeless. Families that meet the definition of Other Populations are also a high priority for this PJ due to the lack of long-term rental assistance available in the community and the units that are available and reasonable for rental assistance to be applicable. It was expressed by multiple public agency providers and shelters assisting qualifying populations that there were not enough resources for families even when receiving supports from outside agencies, and that housing for families and individuals with barriers was unavailable. Public agencies found themselves frequently working with families who in many cases had been formally homeless and were unable to find new housing due to evictions, or were bearing high cost burdens for housing and unlikely to be sustainable in their current home without significant changes to their resources. The most significant statistical finding related to this particular qualifying population was found when comparing the number of households that were burdened with severe property issues and high housing cost burden in comparison to the overall number of units available. There were more renters (QP 'Other Population') having issues than was registered rental housing available. The number of registered rental housing in comparison to non-registered properties was utilized to allow for the broadest scope available of current property conditions, and did not guarantee affordability or rent reasonableness. Families experiencing homelessness, and with additional housing barriers, will not have housing stock that is appropriate to move in to when evaluating the current rental conditions as illustrated. The development of affordable rental housing will resolve the expressed issues within the shelter, close the revolving door of housing instability, and will provide more available units that will not be a cost burden to their occupants.

# **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:

The housing production goal with \$2,045,017 is 8 units. This meets the per unit subsidy for 2 and 3 bedroom units using the section 234 elevatory units. The subsidiy limits are also around the same amount as estimated per unit costs for the larger unit size.

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

The proposed project will functionally end family homelessness in this Continuum of Care's geographical region. The composition of units in the approved proposal will be rented for rates below current Fair Market Rates (FMR) for our region and have mixed funding types to ensure they remain affordable for the designated period of time; including project-based housing vouchers (PBV) and Low Income Tax Credits (LITC). A total of fifty-five units (55) will be created ranging from studio to 3-bedroom units, and will be located within a Qualified Census Tract(QCT) that is close to other amenities including both hospital systems, mental health services, and public transportation. Additional services will be offered onsite that reflect the prioritized needs captured through the Consultation Process, and overall the units will have the amenities available for its tenants to make them desirable, affordable and supportive.

This production goal not only reflects the current needs and composition of the QP's prioritized within this application, but also provides essential affordable and supportive housing services for those priority needs identified within the population and by the service providers whom were consulted.

## **Preferences**

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:

- 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).
- PJs are not required to describe specific projects to which the preferences will apply. Preference will be given in the following order outlined below. All QP's will be served with a Tenant Selection Plan (TSP) effectuated upon initial occupancy. The preferences incorporated into the TSP will be given preference in this order: Homeless, At Risk Of Homelessness, HOME ARP definition of Domestic Violence, and Other Populations as defined by HOME ARP. The eligible households will primarily be identified through the local Homeless Continuum of Care's Coordinated Entry system, which prioritizes referrals for available Permanent Supportive Housing units based on vulnerability and severity of service needs. If the Coordinated Entry's Master Waitlist is depleted, other means of identifying eligible QP's will be undertaken including any waitlists maintained by the local Housing Authority and eligible persons accepted in the order (date and time) that applications were submitted.

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 category of qualifying population, consistent with the PJ's needs assessment and gap analysis:

The lack of permanent supportive housing for individuals and families within the qualifying definition of homeless was reflected throughout the consultation process as a barrier for homeless service providers and public sector entities. The number of available units to provide those supportive services that are needed are not available in the housing stock found within the needs assessment. Our consultation partners that provide victims and veterans services, as well as many of our public sector service providers, serve qualifying populations that are homeless and experiencing these other barriers. Therefore, adopting a preference for the homeless qualifying population will also encompass these other qualifying populations as well, ensuring they have access to services. Utilizing a preference to develop affordable and supportive housing will prevent returns to homelessness and increase housing stability, and ensure that housing being built will not provide an unreasonable cost burden to its occupants as is the current situation with the rental housing that is available.

# If a preference was identified, describe how the PJ will use HOME-ARP funds to address the unmet needs or gaps in benefits and services of the other qualifying populations that are not included in the preference:

Data from the Coordinated Entry system that will be utilized for referrals for the units developed reflects that the individuals meeting the definition of homeless also includes veterans and victims of domestic violence. The Coordinated Entry Policy and Procedures allow for all populations to apply, and the information to do so is public and available 24/7 via phone, and in person assessments can be completed during business hours. Rankings are based upon the following, in this order: Chronic Status, VI-SPDAT Score, Length of Time Homeless, Overall Wellness, and Date of Assessment. Additional qualifying populations will not be deterred from completing the VI-SPDAT Assessment.

# **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 with 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

Not Applicable

• 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.

Not Applicable

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

  Not Applicable
- Specify the required compliance period, whether it is the minimum 15 years or longer.

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

  Not Applicable
- Other requirements in the PJ's guidelines, if applicable: Not Applicable

# LOCALIQ

JournalStar | Journal-Standard **Rockford Register Star** 

PO Box 631200 Cincinnati, OH 45263-1200

## **PROOF OF PUBLICATION**

Kathryn Murphy Stefanie Tarr, City Clerk City Of Peoria 419 Fulton ST # 404 Peoria IL 61602-1237

### STATE OF ILLINOIS, COUNTY OF PEORIA

The Peoria Journal Star, a secular newspaper, has been continuously published daily for more than fifty (50) weeks prior to the first publication of the attached notice, is published in the City of Peoria, County of Peoria, Township of Peoria, State of Illinois, is of general circulation throughout that county and surrounding area, and is a newspaper as defined by 715 ILCS 5/5.

That the attached or annexed was published in the issue dated:

05/18/2022

and that the fees charged are legal. Sworn to and subscribed before on 05/18/2022

Legal Clerk

Notary, State of W. County of Brown

My commision expires

**Publication Cost:** \$86.00

Order No:

7305905

# of Copies:

**Customer No:** 

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"Community Development"
Department", Management Division," and
then "Plans." A hard copy
may also be viewed at City
Hall, 419 Fullon Street in Ihe
Development Center, Roam
to 12:00 p.m. The requirements for entering City Holl
will be based on the current
public health guidance.
In addition, Iwo public. The
first hearing will be
my the ment of the public. The
first hearing will be
wednesday, May 25th at
10:00 am at Peoria City Holl,
10:00 am at Peoria City Holl,
10:419 Fullon Street, in Roam

Aoy 26 at 5:30 pm at incoln Branch of the Pe

Please email comments to Kathryn Murphy at kmur-phy®peoriagov.org. Written comments may also be moiled to Community Development Department, Alln: Kathryn Murphy, of 419 Fullon Street, Room 203. Poor poil 41607. Commente

reasons will be not

in the plans submitted MUD. For questions reaching this Notice, plea contact Kallidyn Murphy (309) 454-8607 or via e-mail



OMB Number: 4040-0004 Expiration Date: 12/31/2022

Application for Federal Assistance SF-424							
	ion: acted Application	* 2. Type of App New Continuat Revision	ion •	* If Revision, select appropriate letter(s):  * Other (Specify):			
* 3. Date Received: 12/20/2022	* 3. Date Received:  4. Applicant Identifier:						
5a. Federal Entity Identifier:  5b. Federal Award Identifier:							
State Use Only:							
6. Date Received by	State:	7. Sta	te Application le	Identifier:			
8. APPLICANT INFO	ORMATION:						
* a. Legal Name: C	ity of Peoria						
* b. Employer/Taxpayer Identification Number (EIN/TIN):  37-6001761  * c. UEI:  K6UKNLP5HVS3							
d. Address:							
* Street1: Street2:	419 Fulton Street						
* City:	Peoria						
County/Parish:	Peoria						
* State:	IL: Illinois						
Province:							
* Country:	USA: UNITED S	STATES					
* Zip / Postal Code:	616021217						
e. Organizational L	Jnit:						
Department Name:				Division Name:			
Community Deve	lopment			Grants Management			
f. Name and contact information of person to be contacted on matters involving this application:							
Prefix: Ms			* First Name	ne: Kathryn			
Middle Name:							
* Last Name: Murphy							
Suffix:							
Title: Grants Manager							
Organizational Affiliation:							
City of Peoria	City of Peoria						
* Telephone Number: 309-494-8607 Fax Number:							
*Email: kmurphy@peoriagov.org							

Application for Federal Assistance SF-424
* 9. Type of Applicant 1: Select Applicant Type:
C: City or Township Government
Type of Applicant 2: Select Applicant Type:
Type of Applicant 3: Select Applicant Type:
* Other (specify):
* 10. Name of Federal Agency:
Department of Housing and Urban Development
11. Catalog of Federal Domestic Assistance Number:
14.239
CFDA Title:
HOME Investment Partnership Program
* 12. Funding Opportunity Number:
M21-MP170207
* Title:
HOME Investment Partnership Program - ARP
13. Competition Identification Number:
Title:
14. Areas Affected by Project (Cities, Counties, States, etc.):
Add Attachment Delete Attachment View Attachment
* 15. Descriptive Title of Applicant's Project:
2021 HOME-APR
Attach supporting documents as specified in agency instructions.
Add Attachments   Delete Attachments   View Attachments

Application for	r Federal Assista	nce SF-424			4122		
16. Congressiona	al Districts Of:						
* a. Applicant	IL-17	* b. Program/Project IL-17					
Attach an additiona	al list of Program/Project	ct Congressional Distri	cts if needed.				
			Add Attachmen	Delete Attac	nment View	Attachment	
17. Proposed Pro	oject:						
* a. Start Date: 0	1/01/2023			* b. En	d Date: 12/31/	2025	
18. Estimated Fu	nding (\$):						
* a. Federal		2,405,902.00					
* b. Applicant			j				
* c. State							
* d. Local			]				
* e. Other			]				
* f. Program Incom	ne		]				
* g. TOTAL		2,405,902.00					
* 19. Is Application	on Subject to Review	By State Under Exe	ecutive Order 1237	Process?			
a. This applic	cation was made avai	lable to the State un	der the Executive O	rder 12372 Process	for review on		
b. Program is	s subject to E.O. 1237	72 but has not been	selected by the Stat	e for review.			
C. Program is	s not covered by E.O.	12372.					
* 20. Is the Applie	cant Delinquent On A	Any Federal Debt? (	If "Yes," provide ex	planation in attach	ment.)		
Yes	<b>⊠</b> No						
If "Yes", provide	explanation and attac	ch					
			Add Attachmer	t Delete Attac	hment	v Attachment	
herein are true, comply with any	this application, I ce complete and accu resulting terms if I a iminal, civil, or admi	rate to the best of accept an award. I ar	my knowledge. I a n aware that any fa	lso provide the re lse, fictitious, or fra	quired assurance	es** and agree	to
** The list of certi specific instruction	ifications and assurances.	ces, or an internet sit	e where you may ol	otain this list, is cont	ained in the anno	uncement or age	ncy
Authorized Repr	resentative:						
Prefix:		*F	irst Name: Patri	ck			
Middle Name:							
* Last Name: U	rich						
Suffix:							
* Title: City	y Manager						
* Telephone Numb	ber: 309-494-8551			Fax Number:			
* Email: purich	@peoriagov.org						
* Signature of Auti	horized Representative		11.11			* Date Signed:	12/15/2022
		fa	HILL				

#### ASSURANCES - CONSTRUCTION PROGRAMS

OMB Number: 4040-0009 Expiration Date: 02/28/2022

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.

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

NOTE: Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the Awarding Agency. Further, certain Federal assistance awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

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

- 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.
- 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.
- 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.
- Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
- 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.

- 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).
- 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.
- 10. 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 statue(s) under which application for Federal assistance is being made; and (j) the requirements of any other nondiscrimination statue(s) which may apply to the application.

- 11. 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 and federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
- Will comply with the 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.
- 13. 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.
- 14. Will comply 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.
- 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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- 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).
- 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."
- Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
- 20. 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	TITLE	
21/1//	City Manager	
Pattlett.		
APPLICANT ORGANIZATION	DATE SUBMITTED	
City of Peoria	12/15/2022	

SF-424D (Rev. 7-97) Back

OMB Number: 4040-0007 Expiration Date: 02/28/2025

#### **ASSURANCES - NON-CONSTRUCTION PROGRAMS**

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

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- 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.
- 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.
- Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
- 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).
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- 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 seg.), 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.
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- 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.
- 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."
- 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	TITLE
THIN	City Manager
Patrick	
APPLICANT ORGANIZATION	DATE SUBMITTED
City of Peoria	12/15/2022

#### 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.

120	405	
Signature	of Authorized	Official

City Manager

PHH1

Title

12/15/2022

Date