



# **Urbana HOME Consortium HOME-ARP Allocation Plan July 2022**

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## HOME-ARP Allocation Plan Template with Guidance

***Instructions:*** All guidance in this template, including questions and tables, reflect requirements for the HOME-ARP allocation plan, as described in Notice CPD-21-10: Requirements of the Use of Funds in the HOME-American Rescue Plan Program, unless noted as optional. As the requirements highlighted in this template are not exhaustive, please refer to the Notice for a full description of the allocation plan requirements as well as instructions for submitting the plan, the SF-424, SF-424B, SF-424D, and the certifications.

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.*

### **Template:**

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

Urbana HOME Consortium staff and consultant identified 22 organizations—including public agencies, service providers, and nonprofit organizations—that represented all of the consultation requirements above and provided a comprehensive picture of the needs of HOME-ARP qualified populations. Staff at these organizations were contacted, and a brief video interview was conducted, asking about the organization's work with Qualified Populations, existing gaps in service to these populations (both internal to the organization and in the general local service provision), and demographics or eligible programs that should be prioritized for HOME-ARP funding. Written notes were taken during these interviews. Out of the 22 organizations contacted for interviews, interviews were able to be conducted with 20.

Additionally, the consultation interview questions were turned into an online survey that was distributed to the mailing list for the continuum of care, enabling other service provider organizations who weren't prioritized for an in-person interview to also provide their insight. This online survey resulted in seven additional responses including two organizations that weren't reflected in in-person interviews.

The interview consultations took place from March 23, 2022, to April 26, 2022. The online survey consultation was open from April 11, 2022, to May 31, 2022.

Consultation summaries below encompass the feedback from relevant and knowledgeable staff members at these organizations. However, they should not be construed as official statements representing the organization.

*List the organizations consulted:*

Agency/Org Consulted	Type of Agency/Org	Method of Consultation	Feedback
<b>Champaign County Continuum of Service Providers to the Homeless</b>	Continuum of Care <i>QPs - Homeless</i>	Video Interview	Due to the small size of our continuum, one major gap is simply the capacity to effectively address both emergency shelter and permanent housing needs simultaneously. Non-congregate, low-barrier, permanent emergency shelter is a major gap in current services. Additionally, finding ways to encourage landlords to accept rental assistance, and quickly guiding shelter clients into rapid rehousing and permanent supportive housing are other gaps. The LGBTQ+ population should be a priority, to provide options where these individuals feel comfortable and are able to address common housing instability issues. In addition, single individuals, despite representing a critical need in the local homeless system, are not as highly prioritized in current services as families or other populations. All HOME-ARP funding categories are needed, but particular priority should be given to permanent supportive housing, programs that facilitate the rapid transition of clients out of shelters and into PSH, and tying supportive services into existing programs more extensively.
<b>C-U at Home</b>	Homeless Service Provider <i>QPs - Homeless</i>	Video Interview	The most significant gaps include the lack of 24-hour shelter facilities, which provides a lot of time for the homeless to be in unstable situations; the need for greater supportive services for clients; increasing bed/space capacity to serve all in need of emergency shelter; and providing facilities or collaborations to address the various needs of the homeless population (including high need populations like those with substance abuse, mental health, or significant medical issues). Due to their overlapping and compounding needs, the chronically homeless should be prioritized, providing the extensive services, in addition to shelter, that

			this group often needs. Supportive services and non-congregate shelter—especially when implemented together—should be HOME-ARP spending priorities, and could help address the needs of emergency shelter clients who are not prepared to live on their own and need greater support.
<b>Cunningham Children's Home</b>	Homeless Service Provider  <i>QPs – Homeless, At-Risk of Homelessness, Fleeing Domestic Violence, Other Populations</i>	Video Interview	Undersupply of local affordable housing (both subsidized and unsubsidized) is a significant gap, making housing difficult to afford even for the lower end of the workforce. Additional gaps include difficulty for clients in acquiring paperwork and navigating systems, shelter options for families, and the seasonal closure of the low-barrier shelter, leading to more individuals sleeping outside. Vulnerable residents who don't meet the strict definition of homelessness are a currently underserved group; directing funding to them would allow for their needs to be met before they get to the point of homelessness. Affordable housing and non-congregate shelter are priority programs for HOME-ARP spending, in order to directly meet the need for shelter and get vulnerable populations off the street.
<b>The Salvation Army</b>	Homeless Service Provider, Veterans' Group  <i>QPs – Homeless, At-Risk of Homelessness, Other Populations</i>	Phone Interview	Major local gaps include securing funding to have the capacity to serve existing needs, and providing resources to ensure clearer communication between service providers, so they can most effectively perform their work. Individuals who have been previously incarcerated should be a priority, providing housing stability so that they can get back on their feet. Non-congregate shelter should be prioritized for funding, followed by rental assistance (keeping people in the housing that they already have), supportive services, and affordable housing.
<b>Habitat for Humanity of Champaign County</b>	Organizations that Addresses Fair Housing  <i>QPs – Other Populations</i>	Video Interview	Affordable rental (and owner-occupied) housing is a major local gap, especially with local speculation by institutional investors. ALICE (Asset Limited, Income Constrained, Employed) families and other low-income members of the workforce struggle in our community and should be considered when

			allocating funding. Affordable housing should be priority number one for HOME-ARP spending.
<b>Courage Connection</b>	Domestic Violence Service Provider  <i><b>QPs –</b> Homeless, At-Risk of Homelessness, Fleeing Domestic Violence, Other Populations</i>	Video Interview	Major gaps in current services include the logistics (including timelines) for getting clients support after they are in a shelter, as well as the availability of safe, quality rental housing where TBRA is accepted. Homeless women and children should be a priority population for this funding, in order to meet the gaps in current resources for these populations (including single women being underserved). HOME-ARP funds should be used to foster greater partnerships between local service providers; all four of the HOME-ARP eligible activities are important for providing an infrastructure to address needs effectively and improve lifelong impacts for clients.
<b>Crisis Nursery</b>	Domestic Violence Service Provider, Homeless Service Provider  <i><b>QPs –</b> Homeless, At-Risk of Homelessness, Fleeing Domestic Violence, Other Populations</i>	Video Interview	There is a huge gap in emergency support for homeless families. Kids and families should be the priority population for HOME-ARP funds, providing options where parents and children don't need to be separated to receive shelter. Additionally, the needs in rural communities are often hidden and need to be considered. Funding should prioritize supportive services in order to meet the underlying needs of individuals, as well as non-congregate shelter, to provide the needed flexibility of emergency housing for different household types.
<b>Department of Veteran's Affairs</b>	Veterans' Group, Public Agency, Homeless Service Provider  <i><b>QPs –</b> Homeless, At-Risk of Homelessness, Other Populations</i>	Video Interview	Major service gaps include the lack of safe and affordable housing, as well as the income cutoffs that clients experience with existing programs, making it hard to build up income without having assistance taken away. Underserved populations that should receive priority include those on the sex offender registry, families (both in finding sufficient units and providing shelter options for families), and institutionalized youth who are aging out of the system. All four of the HOME-ARP eligible programming areas

			meet important local needs; in particular, supportive services across housing types (shelter, voucher holders, affordable housing) help to ensure the success of individuals in these programs.
<b>Housing Authority of Champaign County</b>	Public Housing Agency  <i>QPs – Homeless, At-Risk of Homelessness, Other Populations</i>	Video Interview	Creating greater connection and collaboration with private landlords is a major current gap. In addition, supportive structures for new voucher recipients as they seek out rental housing—including assistance with application fees—are needed, and the authority would like to provide ways to place voucher holders in higher opportunity neighborhoods. Externally, the largest gaps are the shortage of affordable, quality rental housing in the area, as well as the extensive processes that individuals have to go through to get assistance. The literally homeless should be the primary priority group for HOME-ARP funding, followed by families with housing instability, who are often not served well by existing programs or housing stock. Regarding programs for funding, providing a non-congregate or SRO-model facility to address the needs of the literally homeless, followed by rental assistance with supportive services, would be the most effective use of these funds.
<b>Cunningham Township</b>	Public Agency  <i>QPs – Homeless, At-Risk of Homelessness, Fleeing Domestic Violence, Other Populations</i>	In-Person Interview	Major current gaps include finding stable affordable housing for Social Security assistance recipients, serving the needs of homeless women and LGBTQ individuals, providing year-round and 24/7 shelter (including for the low-barrier population), services for families with disabled heads of household, and an SRO model of housing. Priority populations for HOME-ARP funds include women (especially those suffering from mental illness, as they are extremely vulnerable to sexual violence), disabled heads of households, and medically fragile homeless individuals. Program priorities for the funding include non-congregate shelter (especially for women and survivors of sexual and physical assault), with supportive services incorporated. Additionally, leveling

			up affordable housing and supportive services infrastructure should be prioritized; rental assistance is important, but it is a short-term strategy for problems that also need long-term investment.
<b>Champaign County Regional Planning Commission</b>	Public Agency  <i>QPs – Homeless, At-Risk of Homelessness, Fleeing Domestic Violence, Other Populations</i>	In-Person Interview	Existing gaps include transportation for clients (especially those living in rural areas), providing services to those at risk of homelessness who don't meet specific qualifications for homeless funds, individuals released from medical care for whom congregate shelter is not appropriate, and more intensive case management (like substance abuse services) to help clients maintain stability in long-term housing. Disabled individuals should be prioritized for services from HOME-ARP funds, especially given the length of time it can take to receive regular Social Security benefits and the instability before they receive those. Supportive services and non-congregate shelter should be prioritized from the funding, to help clients transition into stability, in addition to quality, well-maintained affordable housing.
<b>City of Champaign</b>	Public Agency  <i>QPs – Homeless, At-Risk of Homelessness, Fleeing Domestic Violence, Other Populations</i>	Video Interview	Significant gaps include year-round, low-barrier emergency shelter for both genders, as well as mental health and substance abuse treatment. The chronically homeless are a priority population, particularly, investments in getting them into permanent housing with supportive services, and providing options for the chronically difficult to house. HOME-ARP provides a unique opportunity to invest in non-congregate shelter and supportive services.
<b>City of Champaign Township</b>	Public Agency  <i>QPs – Homeless, At-Risk of Homelessness, Other Populations</i>	Video Interview, Survey	The decrease in funding as COVID-era programs end will present a gap from the current services being offered. Red tape between organizations and jurisdictions can prevent effective collaboration. Staffing and capacity present barriers, especially for administering programs with extensive reporting requirements. Young mothers struggling to balance childcare with employment and increasing their income are



			a population with significant needs. Rental assistance, constructing more affordable housing, and providing non-congregate shelter should be the priorities, in that order, for HOME-ARP funding.
<b>City of Urbana</b>	Public Agency  <i>QPs – Homeless, At-Risk of Homelessness, Fleeing Domestic Violence, Other Populations</i>	Video Interview, Survey	Staff capacity is one of the biggest needs, to manage grants and other available opportunities. In addition, building collaboration with landlords to make the most effective use of TBRA funding is a gap that needs to be addressed. The chronically homeless are a priority population for HOME-ARP funding, in addition to providing long-term housing options for individuals, and serving high-need individuals (like those with mental health and substance abuse issues). This funding should prioritize supportive services and non-congregate shelter, providing additional resources for emergency shelter and wrap-around services to help achieve stability.
<b>Developmental Services Center</b>	Organization Addressing the Needs of Persons with Disabilities  <i>QPs –At-Risk of Homelessness, Other Populations</i>	Video Interview	Current gaps include the need for more temporary assistance programs for those at risk of homelessness or housing instability, a general shortage of quality affordable housing for low-income households, and insufficient capacity for the case management needs that exist. The developmentally disabled should be prioritized for HOME-ARP funds, in addition to those with mental illness, who often come to DSC but are unable to be served (either because of lack of developmental disability or because the client has a dual diagnosis but their mental health needs are more substantial and out of DSC's wheelhouse). Supportive services would be the most effective program category for HOME-ARP funding, allowing individuals to maintain stability, while affordable housing should also be given high priority.
<b>Community Choices</b>	Organization Addressing the Needs of	Survey	Significant gaps include affordable living situations for those living off of Social Security payments, difficulty in placing tenants with vouchers, and funds for staffing

	<p>Persons with Disabilities</p> <p><i><b>QPs</b> – Homeless, At-Risk of Homelessness, Other Populations</i></p>		<p>generally and especially staffing for direct support to assist clients with day-to-day needs. In addition, the difficulty in navigating the service system is a gap for all populations, not solely those with disabilities. People with intellectual and developmental disabilities should be prioritized for HOME-ARP funding, due to their vulnerability and need for direct support. Supportive services should be prioritized, particularly funding to pay and train direct support workers for those with intellectual or developmental disabilities.</p>
<b>First Followers</b>	<p>Organization Addressing Fair Housing, Civil Rights</p> <p><i><b>QPs</b> – Homeless, At-Risk of Homelessness, Fleeing Domestic Violence, Other Populations</i></p>	Video Interview	<p>Temporary housing is a current gap for their clients (the formerly incarcerated), especially meeting the need for shelter while clients are applying for other assistance. Additionally, both private landlords and shelter providers may be unwilling to serve their clients, due to criminal history or current needs. Priority for HOME-ARP funds should go to anyone below the poverty line, as housing insecurity from cost burden or difficulty finding rental housing makes any kind of stability very difficult. All programming types are important, but priority should go to non-congregate shelter (a larger investment with long-term benefits) and rental assistance (a quickly actionable program). Spending of HOME-ARP money should balance immediate needs with long-term investment.</p>
<b>Greater Community AIDS Project of East Central Illinois</b>	<p>Homeless Service Provider, Organization Addressing Fair Housing, Civil Rights, or the Needs of Persons with Disabilities</p> <p><i><b>QPs</b> – Homeless, At-Risk of Homelessness,</i></p>	Video Interview	<p>The inability to serve individuals on the sex offender registry is a significant gap, in addition to offering continuing supportive services to make sure that clients who move into long-term housing can retain stability. Low-income populations, including those surviving off of Social Security, are a major priority group, as it is difficult for them to prove sufficient income for the private rental screening process. For HOME-ARP activity priorities, TBRA coupled with supportive services are the uses that will meet the most immediate needs. SRO and affordable housing facilities are nonetheless still important, even if they're more long-term.</p>

	<i>Other Populations</i>		
<b>Land of Lincoln Legal Aid</b>	<p>Organization Addressing Fair Housing, Civil Rights</p> <p><i><b>QPs</b> –At-Risk of Homelessness, Fleeing Domestic Violence, Other Populations</i></p>	Video Interview, Survey	<p>Staffing is a major internal issue—working to provide case workers for clients, in addition to legal counsel. Lack of safe and affordable housing is the major gap in the area, with renters facing both difficulties paying for housing and substandard housing conditions. Move-in funding and emergency rent assistance would help avoid evictions or help those in the process to secure new housing. If prioritizing populations for HOME-ARP funding, consideration should be given to geographic or neighborhood-level priorities, providing resources to disinvested areas, in addition to those in the process of applying for disability who have not yet secured this money. Programming priority should be given first to developing affordable housing and non-congregate shelter, followed by rental assistance (including incentives for, and further collaboration with, landlords).</p>
<b>LGBT Resource Center, UIUC</b>	<p>Organization Addressing Civil Rights</p> <p><i><b>QPs</b> – Other Populations</i></p>	Video Interview	<p>Major gaps include obtaining accurate data on the LGBT population, providing shelter for nonbinary individuals (since existing shelters are gender-separated), providing mental health and other supportive services, and providing duplicate resources (shelter in particular) if individuals are excluded from existing gender-binary facilities, either because of nonbinary identity or an individual ban. LGBT populations should be prioritized for HOME-ARP funding (including providing mental health and substance abuse services for the significant needs in this population), in addition to disabled individuals who may have difficulty accessing services. Rental assistance is a particularly important funding area to keep people housed, in addition to providing non-congregate additional shelter facilities and incorporating supportive services more robustly into shelter facilities.</p>

<b>Champaign-Urbana Tenant Union</b>	<p>Organization Addressing Fair Housing, Civil Rights</p> <p><i><b>QPs</b> – Homeless, At-Risk of Homelessness, Other Populations</i></p>	Phone Interview	<p>Lack of sufficient funding for services is a major gap, in addition to bureaucratic procedures that make it hard for prospective applicants to receive services or categorically exclude particular groups. Disabled individuals, families with children, and the lowest-income households are some of the most vulnerable community members who should be prioritized for HOME-ARP funding. Rental assistance should be a programming priority, in addition to providing shelter options for women and families with children.</p>
<b>Immigrant Services of Champaign-Urbana (ISCU)</b>	<p>Organization Addressing Civil Rights</p> <p><i><b>QPs</b> –At-Risk of Homelessness, Other Populations</i></p>	Survey	<p>Major gaps include COVID-era rental assistance funds phasing out, rising housing costs and lack of affordable housing, and a lack of recognition of the needs of immigrants. Immigrant communities are among the poorest in the Consortium service area and should be prioritized for HOME-ARP funds. All four program priorities have the potential to benefit immigrant populations; priority should be put toward accessible rental assistance, affordable housing, and non-congregate shelter.</p>

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

**Gaps**

After being asked to describe the work that their organization does with HOME-ARP qualified populations, consultees were asked the following question –

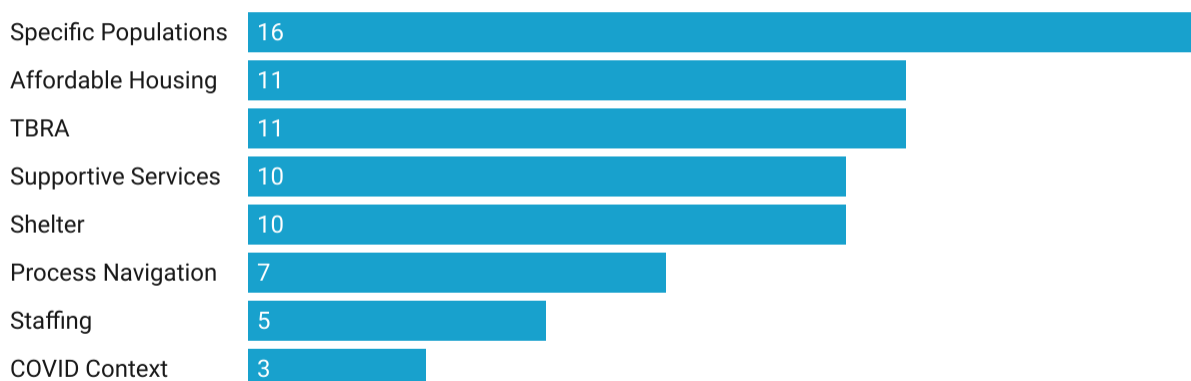
**What gaps or outstanding needs do you see in your organization’s assistance to these qualified populations? (These gaps and needs can be specific to housing, or apply to general supportive services)**

**a. What gaps or outstanding needs do you see in the overall local approach to addressing the needs of qualified populations?**

As seen from the graph below, many of the responses to this question (the second through fifth most common themes) were thematically in line with the four HOME-ARP eligible activities, which were asked about in more detail later in this section.

## Themes in Service Gaps (Internal and External)

Number of responses addressing theme



Created with Datawrapper

**FIGURE 1 – THEMES IN SERVICE GAPS, FROM CONSULTATIONS**

In addition, the most common theme related to the needs of a specific population, which was often elaborated upon in the next interview question about HOME-ARP priority populations. Populations mentioned in this question include –

- Sex Offenders (mentioned three times)
- Immigrants (mentioned twice)
- High Medical Need Homeless (mentioned twice)
- Disabled Head of Household (mentioned twice)
- Women and Children (mentioned twice)

- Rural/Outlying Population
- At-Risk of Homelessness
- Work Requirement Excluded
- VASH Exiting
- LGBT
- Chronically Homeless
- Formerly Incarcerated

Additional gaps that were commonly discussed included difficulties in navigating existing processes, lack of staffing capacity and the subsequent effect on work that organizations are able to perform, and adjusting to the particular circumstances of COVID (including increased needs for service, and adjusting to the current draw-down in COVID-related funding).

### ***Priority Populations***

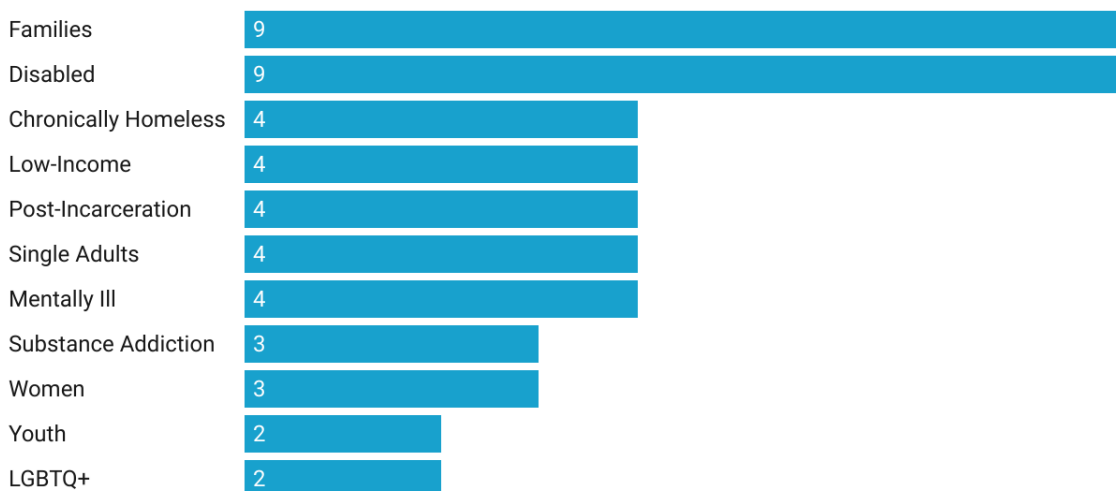
In order to understand population group priorities, consultees were asked the following question

**Are there particular populations (demographics, groups, communities) that you believe should be prioritized for HOME-ARP spending? This could be because of particular difficulties in getting services to these groups, their more substantial needs, or other reasons for increased priority.**

Categories that received one or more mentions as a priority population are seen in the graph below.

## Priority Populations

Number of mentions in consultation



Created with Datawrapper

**FIGURE 2 – PRIORITY POPULATIONS, FROM CONSULTATIONS**

This shows that families and the disabled were the most frequently mentioned priority population (each with 9 responses), followed by the chronically homeless, low-income, post-incarceration, single adults, and those with mental illness (with four responses each).

While many of these categories may overlap, effort was made in sorting the responses not to overgeneralize, and to categorize responses in the way that the consultees described them.

Categories that received single responses included

- Disinvested neighborhoods/geographic areas
- Immigrants
- “The literally homeless”
- Rural homeless
- Medically fragile
- At-risk/those not meeting the strict definition of homeless

### ***Priority Programming***

Consultees were also presented with the following question –

**If the HOME Consortium hopes to focus their investment in a single program or very small number of programs, which of the four categories of HOME-ARP**

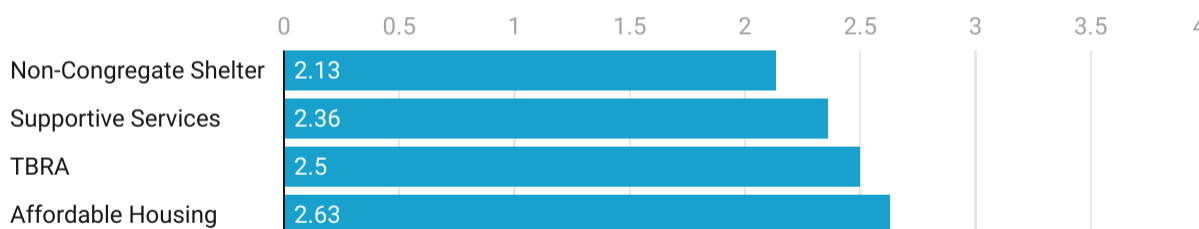
**spending (defined below), would be most effective at addressing local needs? Are there any that you feel would be ineffective?**

Interviewees spoke about any preferences that they had within the four spending categories, while online survey respondents were presented with a ranked-choice question, as well as the opportunity to elaborate on their rankings below if they wished. In order to quantify and compare the priorities, staff used interview notes to synthesize the interview responses to this question into numerical rankings. In some cases, interviewees explicitly ranked their priorities—one through four—in the interview, making this process simple. Other interviews did not allow for this precise level of sorting but expressed some preferences (for example, their top two priorities, or their top priority and lowest priority) and rankings were assigned to the relevant categories. In rare cases, interviewees did not provide any indication of priority between the four categories or expressed that all were equally important, in which case no rankings were assigned to their programming responses.

The graph below shows the average ranking of each of the four eligible activities, based on staff-assigned verbal scores and respondent-assigned survey scores. Using these rankings, non-congregate shelter was the highest priority, on average, followed by supportive services, TBRA, and affordable housing. However, the range of average scores is 0.5 points, indicating that there was broad support for all four categories.

## Average Ranking of HOME-ARP Eligible Activities

Based on score of 1 (highest priority) to 4 (lowest priority)



Created with Datawrapper

**FIGURE 3 – RANKING OF HOME-ARP ELIGIBLE ACTIVITIES, FROM CONSULTATIONS**



## 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.*

### **Template:**

*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: 6/30/2022***
- ***Public comment period: Preliminary - 4/28/2022 - 5/31/2022; Draft Plan Comments – 6/30/2022 – 7/29/2022***
- ***Date(s) of public hearing: 7/18/2022; 7/26/2022***

### ***Describe the public participation process:***

For the initial public engagement—before the drafting of the allocation plan—the consultant created an online SurveyMonkey survey for the general public (separate from the previous online survey for service providers). This survey was distributed to the continuum of care mailing list with a request to distribute to their contacts, sent to 36 additional email contacts for local nonprofits and city-documented neighborhood groups, and posted on social media by local governments. The survey was open from April 28 to May 31, 2022, and received 128 responses. Voluntary demographic information was collected from the survey, as well as questions about how to spend HOME-ARP funding.

In addition to the survey, the consultant presented the progress of the HOME-ARP allocation plan in public meetings to the following entities on the dates listed below –

- Continuum of Service Providers to the Homeless - March 1, April 5, and May 3, 2022
- City of Urbana Community Development Commission - April 26, 2022
- City of Urbana City Council – June 13, 2022
- City of Champaign City Council – June 14, 2022
- Champaign County Regional Planning Commission Community Action Board – June 23, 2022

Most of these presentations concluded with general questions about the HOME-ARP program and allocation planning process except for the Champaign City Council, who provided more direct feedback on HOME-ARP priorities. Champaign Council members expressed the importance of all four spending categories; however, due to existing programming (including recent investment in low-barrier shelter operations) and the needs that they saw, Council members were consistent in placing supportive services as the highest priority for HOME-ARP spending, followed by affordable housing.

The meeting with Champaign City Council also included two public comments about HOME-ARP funding. The first commenter discussed the creation of a landlord risk mitigation fund to address landlord concerns, the need to eliminate criminal record disclosure as a means of discriminating against renters, collaborating with the school district to identify families in need, serving a broader category of domestic violence victims past those meeting the strict definition of fleeing, improving rental property inspections, increasing transitional housing stock and moving more toward a housing first model, and utilizing the resources provided by the US Interagency Council on Homelessness. The second commenter emphasized the need to serve the literally homeless, the importance of quickly providing services rather than dragging out a process and causing people to lose hope, and the value of providing facilities to serve the homeless, addressing problems like mental health and lack of education, and providing individuals with relief so that they don't pursue crime and substance abuse as ways to cope with their situation.

### ***Non-Survey Feedback***

HOME Consortium staff and allocation planning consultant also received several emails during the public input process, not summarized in the survey response section below. One email was the record of a conversation with City of Champaign front desk staff, where the caller expressed “that they wished to see more funds being allocated to sheltering the homeless and would like to see more stable sources of shelter for these individuals.” One email expressed the sender's negative experience and removal from the existing Shelter Plus Care program and expressed that funding should be focused on improving the staffing for organizations serving Qualified Populations so that they can more effectively serve clients. One email was from a community member inquiring about immediate rental assistance needs. This community member was

provided information on currently available resources. Finally, one email was from the owner of an existing motel in the area, expressing their interest in converting the motel into affordable housing facilities, with case management and other programming facilities included.

### ***Public Review and Comment***

After the draft allocation plan was completed, the Urbana HOME Consortium opened a period of public comment on the draft plan, from June 30, 2022 to July 29, 2022, with two public hearings, on July 18 and July 26. The public hearing notice is seen in Attachment A in the Appendix of this document. This notice was published in the News-Gazette, the local newspaper of record, on July 3<sup>rd</sup>, 2022. The notice was also linked on the front page of the City of Urbana website for the entire public comment period. The online public notice was posted on social media by the cities of Champaign and Urbana and was distributed via email to 1) all individuals involved in the consultation process; 2) all survey respondents who provided their email address in the voluntary contact information section; 3) the continuum of care email list; and 4) all community groups and nonprofits who were previously emailed about the public survey.

No members of the public spoke during the two public hearings. Following the second public hearing, members of the Community Development Commission asked clarifying questions about the application and referral process for HOME-ARP programming, which were then answered by staff. The Community Development Commission then voted 3-0 in favor of forwarding a recommendation to submit the HOME-ARP Allocation Plan.

One piece of written feedback was submitted during the public comment period, an email sent to City of Champaign staff on July 6, 2022. This email is attached in its entirety in Attachment B in the Appendix. While this email provides extensive feedback and descriptions of the homeless experience in the area, primary themes in the document include: providing alternatives to congregate shelter, improving the system for temporary hotel stays for homeless individuals, creating a safe parking area for individuals living out of their cars, providing alternatives to shelters for domestic violence providers, improving interventions to prevent evictions, and providing direct funding to housing insecure individuals with minimal paperwork and qualification procedure.

### ***Describe efforts to broaden public participation:***

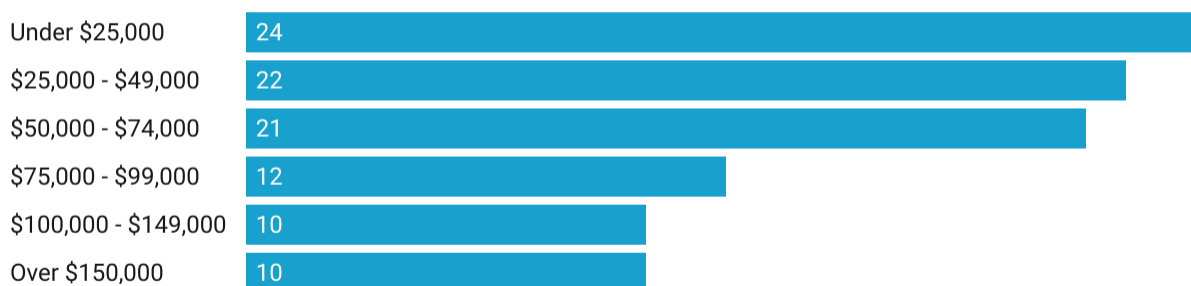
In addition to presenting at public meetings, the online survey allowed for an accessible and time-flexible opportunity for public comment. The survey link, information about HOME-ARP, and a request to share this content with an organization's contacts were distributed to all Continuum of Care service providers, in addition to other non-consortium community groups, in an effort to reach the broadest swath of residents. The survey was translated into Spanish, and contact info to request further accommodations was included in the introduction to the survey. In addition, the online survey was converted into a pdf and sent to public agencies, for cases when manual survey completion was more feasible.

Success in engaging with a broad population, including often disenfranchised groups, was shown by the survey's demographic questions, with two of the most salient variables discussed below.

Of the 99 survey respondents who provided household income information (77% of all respondents), the lowest income categories were most heavily represented, with nearly half of these respondents coming from households making under \$50,000 per year. This indicates a strong response rate from low-income households who could be the clients of HOME-ARP programming.

## Annual Household Income of Survey Respondents

Number of respondents



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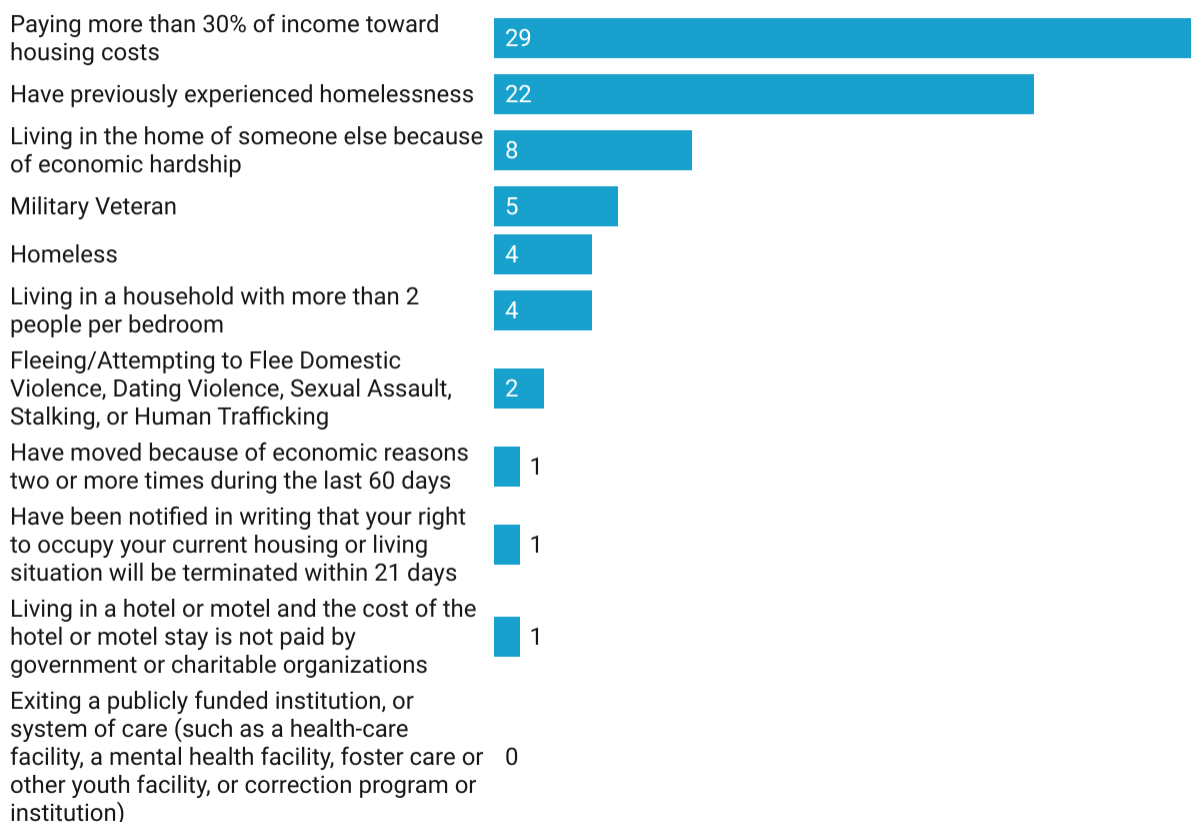
**FIGURE 4 – ANNUAL HOUSEHOLD INCOME OF SURVEY RESPONDENTS**

This is reinforced by another demographic question, which read “Please check the box for any of the HOME-ARP Qualifying populations that describe you or your household members,” with qualifying attribute language taken from official HOME-ARP documentation. Forty-seven respondents, or more than a third of all respondents, indicated that they met one of these categories. While many of these attributes don’t individually qualify a household for HOME-ARP assistance, this question again indicates that the survey was successful in reaching housing-

vulnerable populations who may be able to take advantage of eventual HOME-ARP services.

## HOME-ARP Populations in Survey Responses

By number of respondents



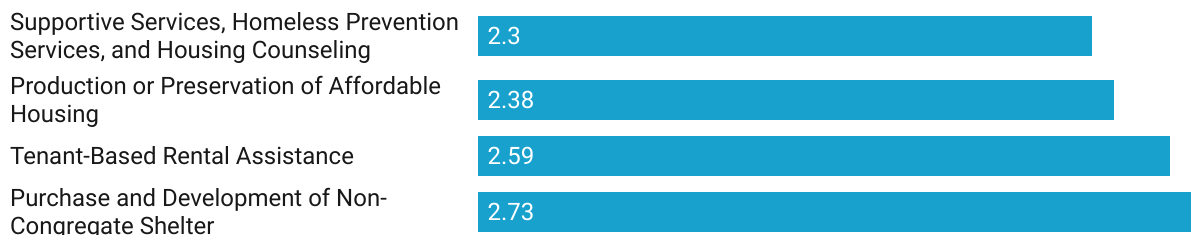
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**FIGURE 5—HOME-ARP POPULATIONS IN SURVEY RESPONSES**

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

Similar to the consultation ranking of HOME-ARP eligible programs, public survey respondents were asked to rank the four categories, with descriptions of each spending category included in the question. Like the stakeholder rankings, the average ranks for each category had a range of less than .5, indicating support for each program. However, the public ranked supportive services as their highest priority, followed by affordable housing, TBRA, and non-congregate shelter.

## Public Ranking of HOME-ARP Eligible Programs

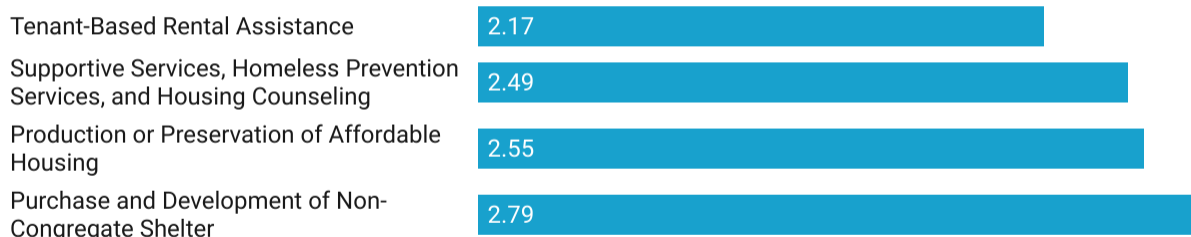


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**FIGURE 6 – PUBLIC RANKING OF HOME-ARP ELIGIBLE PROGRAMS**

When the HOME-ARP program ranking is filtered to just show the rankings of the 47 individuals who responded to “Please check the box for any of the HOME-ARP Qualifying populations that describe you or your household members,” the subsequent ranking is shown below. Focusing on this population of possible HOME-ARP beneficiaries, the highest priority activity was rental assistance, followed by supportive services, affordable housing, and non-congregate shelter.

## Qualified Population Ranking of HOME-ARP Eligible Programs



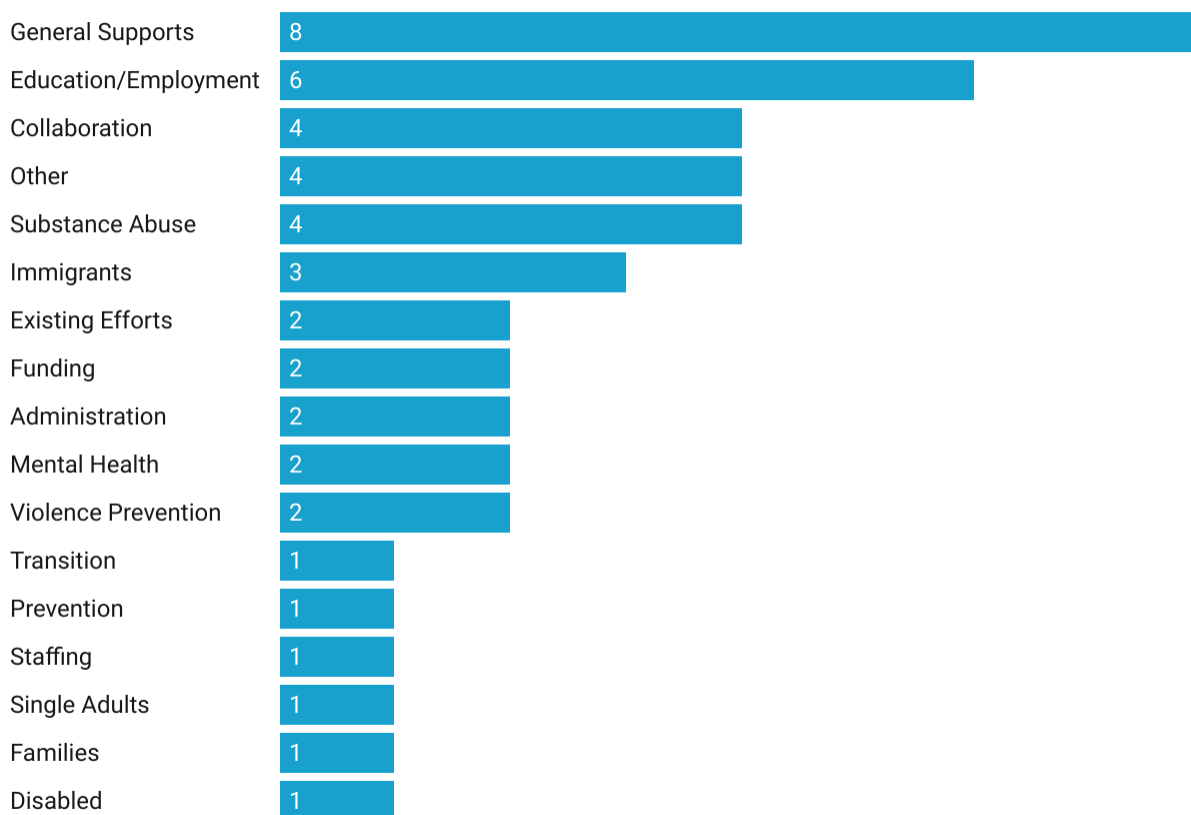
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**FIGURE 7 – QUALIFIED POPULATION RANKING OF HOME-ARP ELIGIBLE PROGRAMS**

Survey respondents were provided the following question to elaborate on their thoughts about the four priority areas:

**Do you have specific ideas for funding projects and programs related to any of the priority areas? If so, please enter them below in the text box associated with the relevant priority area.**

The following section will discuss the responses for each priority area, with the responses sorted by major themes and representative quotes illustrating the responses received.

*Supportive Services, Homeless Prevention Services, and Housing Counseling***Supportive Services Suggestions, by Theme**

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**FIGURE 8 – SUPPORTIVE SERVICES SUGGESTIONS FROM SURVEY, BY THEME**

The most common suggestions for supportive services involved general counseling and support -

- “Need more homeless rehabilitation to help them stay stable”
- “Increased case management and access to supportive services.”

This was followed by suggestions for assistance in educating clients or assisting them in securing employment –

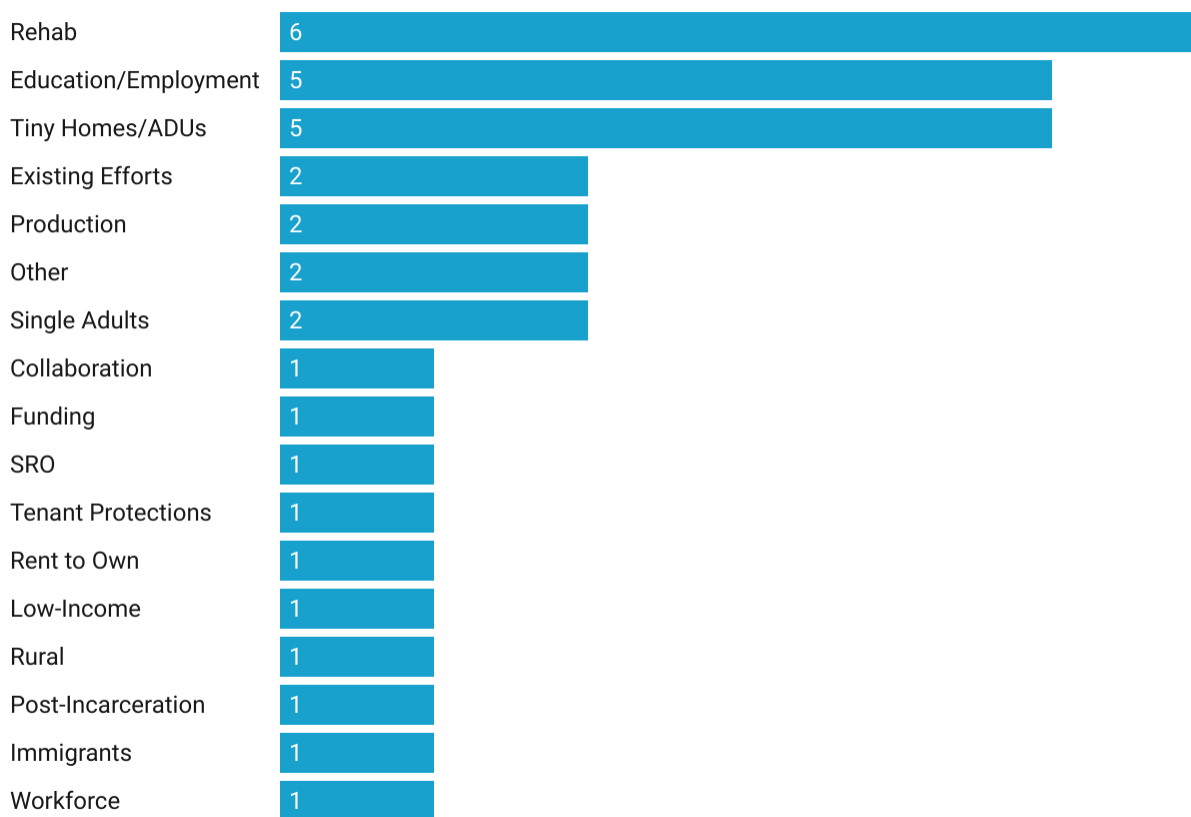
- “have counselors that can give information, job recruiters”
- “Definitely a need for counseling services including money mgmt..”

Another recurring theme was increasing collaboration –

- “Additional housing navigation specialists added into any of the following: HACC, RPC, or another entity that is accessible by any community member”
- “This could be a joint effort with other social services so people are receiving streamlined services”



Finally, many respondents emphasized the need for services for specific populations, including those with substance abuse or mental health struggles, immigrants, single adults, families, and the disabled.

***Production or Preservation of Affordable Housing*****Affordable Housing Suggestions, by Theme**

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**FIGURE 9 – AFFORDABLE HOUSING SUGGESTIONS FROM SURVEY, BY THEME**

The most common suggestion for affordable housing projects was renovating or rehabilitating existing housing in the community –

- “It could be a good model to purchase and rehab not only buildings but also trailers”
- “Convert hotels/motels into efficiencies”
- “Converting old fraternity/sorority houses or pre-existing hotels to room rental places for the community.”

Respondents also emphasized the integration of education and employment into affordable housing provision –

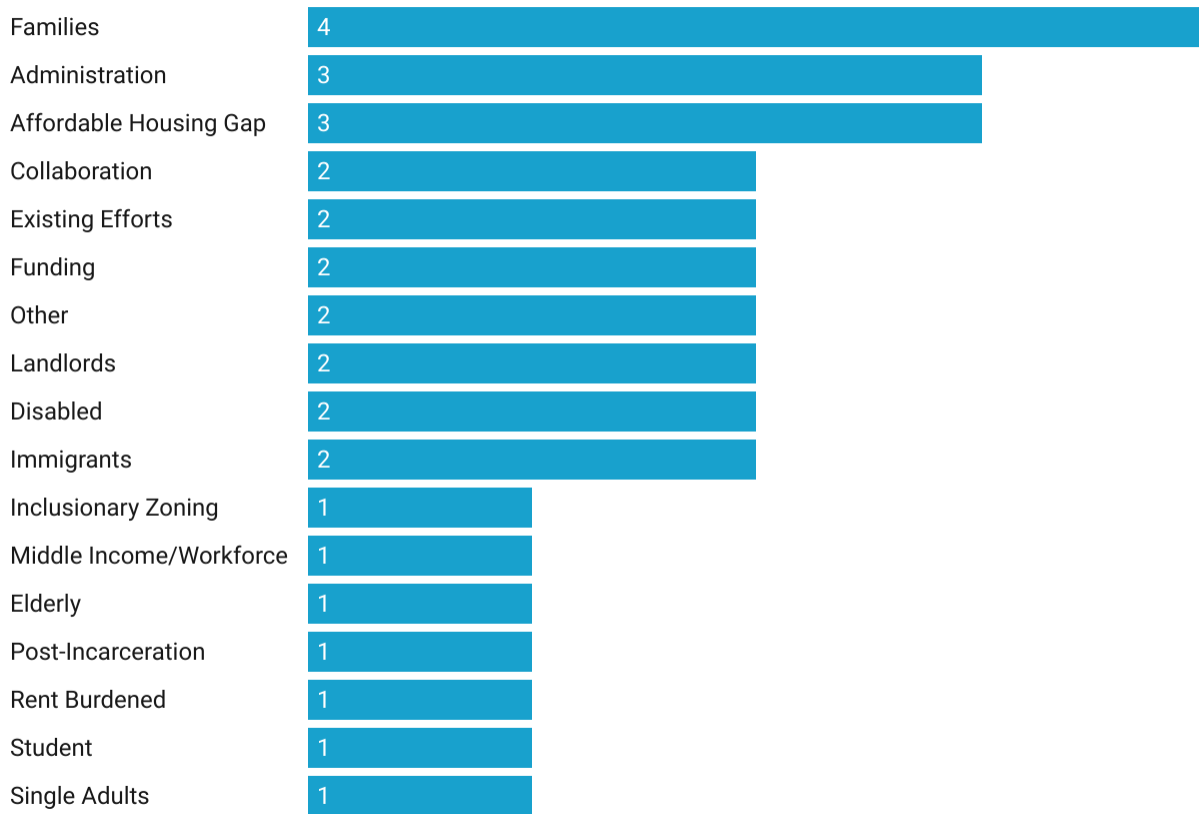
- “Programs for community members needing guidance and help with first time home ownership”
- “Volunteer labor or pay able homeless for labor”

- “many of those persons that are part of the vulnerable populations such as immigrants and other at-risk minorities can be employed in rehabbing and at the same time learning from professionals carpentry and other skills in rehabbing a dwelling where they may then live with their family”

Several respondents mentioned the possibility of small-scale housing (including ADUs and tiny homes) to provide shelter –

- “Mini houses would provide many single homeless individuals with a place to call home”
- “Several cities across the country have constructed small houses for people who are homeless and made them available rent-free”
- “Support the ADU measure in Champaign”

Respondents again mentioned several population groups that service should be prioritized for, including single adults, low-income and rural households, individuals leaving incarceration, immigrants, and the workforce.

***Tenant-Based Rental Assistance*****TBRA Suggestions, by Theme**

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***FIGURE 10 – TBRA FROM SURVEY, BY THEME***

The most common suggestion for Tenant-Based Rental Assistance was to give priority to families –

- “prioritize families with children and then the disabled, 12 month subsidies”
- “3-6 months of assistance for parents that have no paid maternal leave”

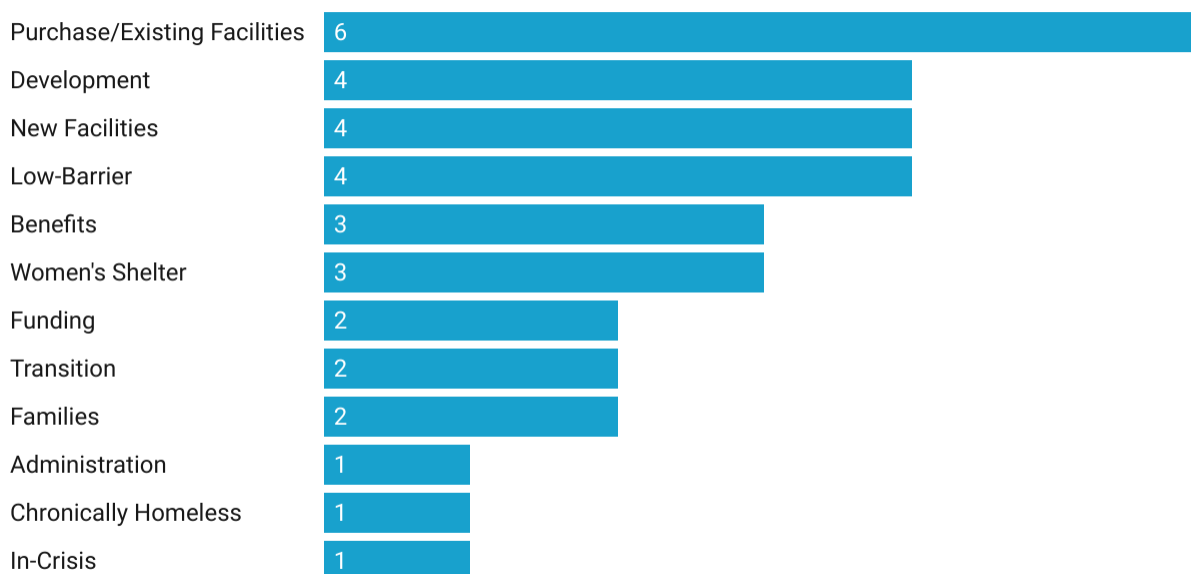
Respondents also provided feedback on how assistance should be administered –

- “Ongoing programs based on an application and limitations on number of times assisted per year so as to allow multiple households to benefit”
- “Graduated assistance program that tapers assistance”
- “Establish rent cap percentages/thresholds”

TBRA’s role in addressing the local affordable housing gap was also expressed –

- “Tenant based rental assistance is needed due to the high cost of move in”
- “Rent is too high in this area and it's hard for people to find affordable rentals”

Major populations to focus TBRA funding toward included the disabled, immigrants, the workforce, the elderly, those exiting incarceration, students, and single adults.

*Purchase and Development of Non-Congregate Shelter***Non-Congregate Shelter Suggestions, by Theme**

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**FIGURE 11 – NON-CONGREGATE SHELTER SUGGESTIONS FROM SURVEY, BY THEME**

The most common suggestion for non-congregate shelter was to purchase existing facilities for its use –

- “There are many historic fraternity/sorority homes no longer in use that would make excellent candidates”
- “Vacant/available motels in north Urbana that could be purchased and rehabbed”
- “Convert old nursing homes, hotels etc into temporary housing for families”

Other respondents encouraged the development and construction of these facilities –

- “Develop a trailer park for permanent or semi-permanent housing”
- “Tiny house village”

Others simply expressed the need for additional shelter facilities –

- “More and Better shelters”
- “The cities or the county should own 12-24 units of good-quality rooms and apartments for individuals and families who are facing a crisis”

A particular shelter need was additional low-barrier facilities –

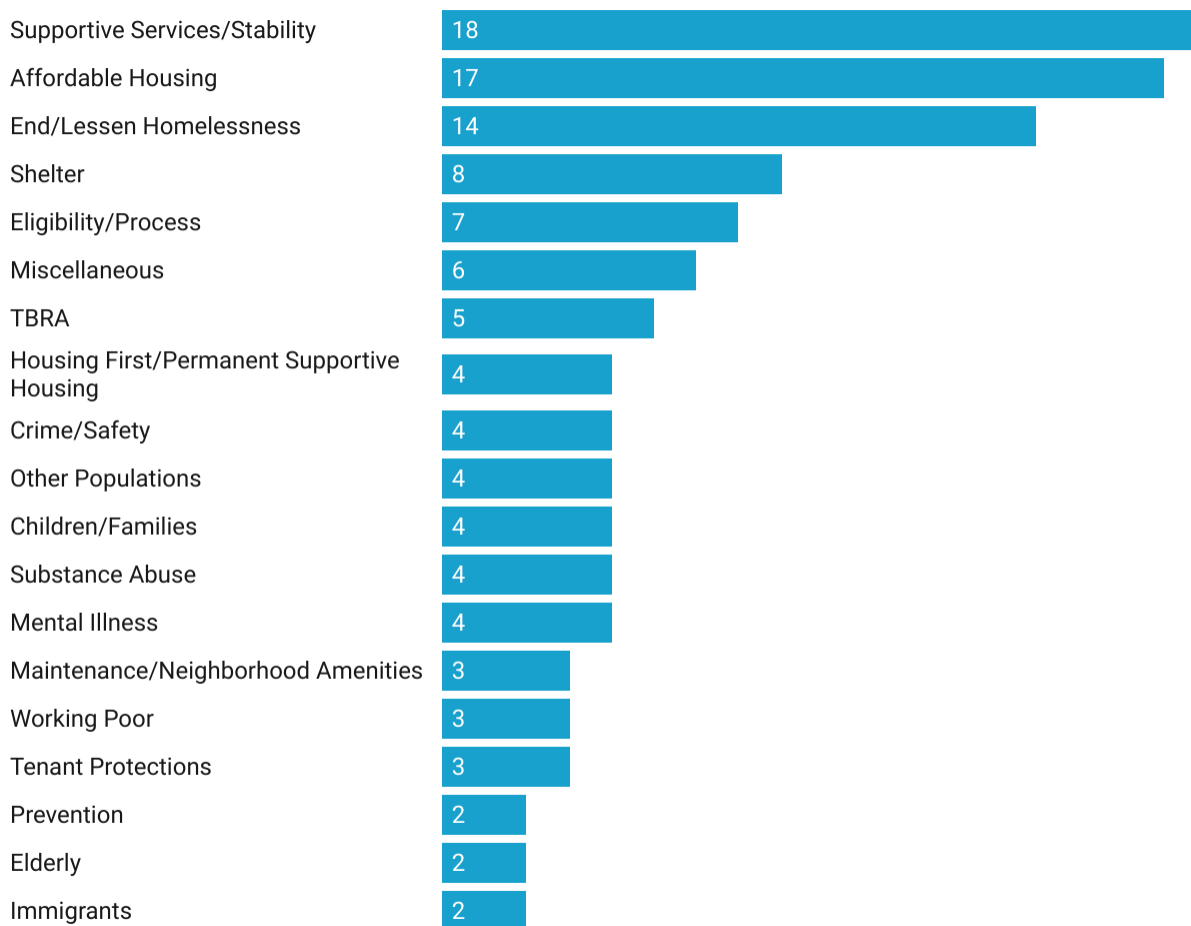
- “Make sure in winter that even those with active addiction are housed overnight”
- “A low barrier shelter”

Particular populations that should be served by a low-barrier shelter included women and families, as well as both the chronically homeless and those in a temporary crisis.

Respondents were provided the following question on goals for HOME-ARP spending.

**What specific goal(s) or outcome(s) would you like to see achieved with this money?**

## Themes in Public Goals for HOME-ARP Funds



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**FIGURE 12 – GOALS FOR HOME-ARP FUNDS FROM SURVEY, BY THEME**

When discussing goals for the HOME-ARP funds, the most commonly addressed theme was long-term stability and the role that supportive services play in this –

- “Focus on support services and assistance to families to keep them in stable housing”
- “People not just getting financial assistance, but acquiring knowledge and behavior changes to make their life more stable”

The next most common was addressing local housing affordability issues –

- “More options for low income people that need housing.”



- “Increased access to safe housing for children and families.”

The third most common were explicit calls to end or lessen homelessness in Champaign County

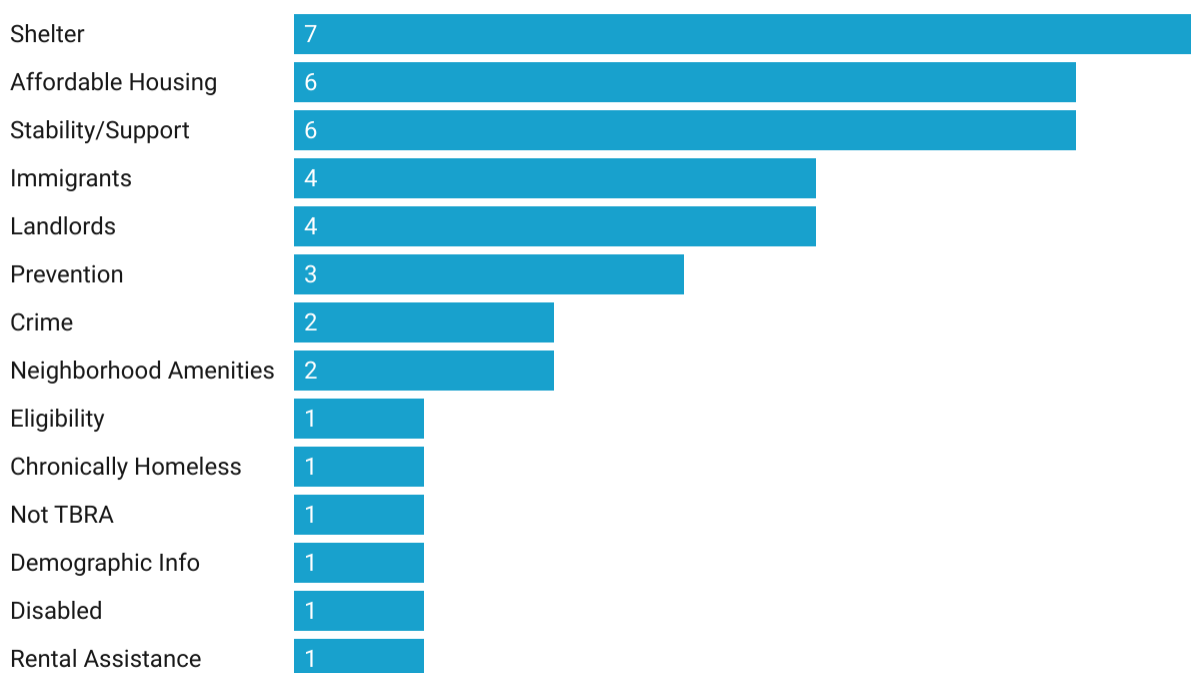
- “I would like to not see anyone sleeping outside. There needs to be enough shelter spaces to accommodate individuals, families and people with mental health and/or substance abuse issues. Once people are housed they need access to supportive services.”

The graph above shows the remaining themes including providing more short-term shelter options, expanding eligibility for services or streamlining processing, and addressing the needs of specific populations (those with mental health or substance abuse struggles, children and families, the working poor, the elderly, immigrants).

Finally, respondents were able to provide any additional comments that were not addressed in the previous questions:

**Please provide any additional feedback on these funds and how they should be prioritized or approached by the Urbana HOME Consortium.**

## Themes in Additional Survey Comments



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**FIGURE 13 – ADDITIONAL COMMENTS FROM SURVEY, BY THEME**

When provided the opportunity to offer additional comments, the most common theme was the need for expanded shelter capacity –

- “I’ve seen in the last 2 -3 weeks that more emergency shelters are needed. The only one available is currently full leaving many on the streets in inclement weather; some [with] minor health problems that are made worse by sleeping outdoors.”
- “CU needs permanent accessible shelter for those most vulnerable, and funds to support staff year round for the same.”

Respondents also expressed the need to address the lack of local affordable housing –

- “More income-based housing should be added... Duplex houses for single families with kids and better shelters for the homeless”
- “Affordable housing and supportive services should be prioritized. Affordable SAFE housing is not always available. Shelters are helpful in the short term, but it is better to keep a person in a home instead of putting them on the street”

Others mentioned providing the support for clients to achieve long-term stability –

- “Programming should focus on addressing underlying issues contributing to housing problems, rather than applying "band-aid"
- “Keep people from becoming homelessness, get people off the streets, keep people off the streets”

Population groups of interest included collaborating with private landlords, as well as providing services to immigrants, the chronically homeless, and the disabled, as well as a general focus on serving the demographic groups most in need.

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

All comments that were able to be sorted were accepted and factored into the data featured above. The four comments below were responses to the Additional Feedback question and were placed in a “Miscellaneous” category because they either expressed general support or opposition to the entire HOME-ARP project or because the commenter’s intent was unclear.

- “All four are valuable!”
- “These are all great uses.”
- “Send them back to federal government. Obviously this late in the game you don’t need the money. Give it Back to the taxpayers”
- “Slow and easy”

## Needs Assessment and Gaps Analysis

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

**Template:****OPTIONAL 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	45	17	81	5	0								
Transitional Housing	21	11	35	35	0								
Permanent Supportive Housing	27	12	42	42	31								
Other Permanent Housing	0	0	4	4	2								
Sheltered Homeless						57	80	3	17				
Unsheltered Homeless						0	2	0	0				
<b>Current Gap</b>										-36	#	-82	#

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

**UNITS ARE EXCLUSIVE AND POPULATION IS NON-EXCLUSIVE (I.E. VETERAN BEDS ARE NOT PART OF OTHER BED COUNTS, BUT VETERAN INDIVIDUALS ARE COUNTED WITHIN OTHER POPULATION COUNTS.**

**OPTIONAL 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	34,609		
Rental Units Affordable to HH at 30% AMI (At-Risk of Homelessness)	1,983		
Rental Units Affordable to HH at 50% AMI (Other Populations)	10,784		
0%-30% AMI Renter HH w/ 1 or more severe housing problems (At-Risk of Homelessness)		9,583	
30%-50% AMI Renter HH w/ 1 or more severe housing problems (Other Populations)		1,624	
<b>Current Gaps</b>			7,600 ELI At-Risk Units 0 (-9160) Other Units

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

While these tables provide a useful introduction to the status of qualified populations and facilities serving them, they overlook features like a mismatch between the demographics a facility can serve and the actual individuals seeking service, differences in facility supply and service demand over time, and the value of redundancy in service provision (for example, if an individual is forbidden from a particular facility or has had a negative experience discouraging them from seeking help there). These will be discussed later in the unmet service need and gaps sections.

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

*Homeless as defined in 24 CFR 91.5*

One hundred thirty-seven individuals were counted in the 2022 Point in Time count, of whom, 111 were in emergency shelters, 24 were in transitional housing, and two were unsheltered.

Within this homeless population, 76 individuals (55.5%) were Black or African American, followed by 54 (39.4%) white, six (4.4%) of multiple races, and 1 (0.7%) American Indian or Alaska Native. Eleven of these individuals (8.0%) identified as Hispanic/Latino. 84 (61.3%) of the homeless individuals counted were male, and 53 (38.7%) were female.

Sixteen chronically homeless individuals (11.7%) were part of this count, all of whom were living in emergency shelter.

Thirty-four (24.8%) of the individuals counted were children under the age of 18, 24 (17.5%) were between the ages of 18 and 24, and 79 (57.7%) were over the age of 24. Of the youth population (here meaning 24 or younger, 15 were unaccompanied. All of these unaccompanied youth were legal adults (18 or older) and were either in emergency or transitional shelter. One of these unaccompanied youths was chronically homeless.

Fifty-seven individuals (41.6%) were in households with both adults and children, including all 34 children in the count, nine 18-24-year-olds, and 14 other adult parents. Six youth individuals in the 18 to 24 range had children of their own, with their children representing 7 of the under-18 cohort. These youth parents included five females and one male. The remaining 80 adults were in adult-only households. One of these households was a pair, while the other 78 individuals were in one-person households.

Three of the homeless individuals were veterans. All three were males living in emergency shelter. One veteran was chronically homeless.

Twenty counted individuals (14.6%) had a serious mental illness (18 living in emergency shelter, and two in transitional shelter). Fourteen individuals (10.2%) had a substance abuse disorder (all living in emergency shelter). Five individuals, or 3.6%, (all in emergency shelter) were adults with HIV/AIDS. Seventeen individuals (12.4%) were adult survivors of domestic violence; ten living in transitional shelter and seven in emergency shelter.

*At-Risk of Homelessness as defined in 24 CFR 91.5*

Using the shorthand for At-Risk from the table above (0%-30% AMI Renter households with 1 or more severe housing problems), HUD's Consolidated Plan and Continuum of Care Planning Tool states that there are 9,583 At-Risk households in the Urbana HOME Consortium's jurisdictional boundaries (based on the 2011-2015 Comprehensive Housing Affordability Strategy, or CHAS). In order to provide more detailed information on the demographic components of this population (and more recent data), the remainder of this section will not use the CHAS, but will instead use American Community Survey (ACS) microdata for all of Champaign County. This will allow for examining demographics within the At-Risk and Other Populations groups in a way that is not possible with the summary tables from the planning tool.

The Urbana HOME Consortium's jurisdiction represents the entirety of Champaign County, minus the village of Rantoul. This means that the HOME Consortium serves 93.8% of the county's population, according to 2016-2020 ACS data. When looking specifically at the At-Risk population, Rantoul's 2011-2015 CHAS data indicates that it had 570 At-Risk households, or 5.9% of the At-Risk households in Champaign County. This further supports the fact that while the county-wide data won't perfectly describe the Urbana HOME Consortium's service area, the vast majority of the people described are in HOME Consortium jurisdiction, so this data provides a useful estimate for the demographics of at-risk and housing unstable populations that the consortium serves.

According to 2016-2020 ACS microdata sources from IPUMS USA, Champaign County had 12,294 households at risk of homelessness (defined here as renter households below 30% of Area Median Income and having one or more of the following severe housing problems: lacking kitchen or complete plumbing, severe overcrowding, severe cost burden).

This At-Risk population is 44.4% white, 25.4% black, and 23.5% Asian or Pacific Islander, with all other groups making up less than 5% each. Hispanic/Latino individuals of any race make up 7.4% of this population. The average age of an individual living in an At-Risk household is 25.2, while the average age in the county is 35.3. 1.6% of individuals in this group do not speak English or don't speak it well. 81.3% of At-Risk individuals are American citizens (compared to 91.7% of county residents). After English—spoken at home in 64% of households—the most commonly spoken languages are Chinese (12.5%), Spanish (5.8%), and Hindi (5.1%).

The average household income for this group is \$5,989, compared to the average county income of \$75,131. 92.1% of individuals 25 or older have a high school diploma or equivalent. Of the adult population, 61.5% are not in the labor force, 32.2% are employed,

and 6.2% are unemployed. 1% of individuals in this category are veterans. 8.7% of individuals have some type of disability.

The average household size for this population is 1.7 people. The average gross rent (including utilities) for a household is \$925 per month. 1.7% of households lack a full kitchen, while 0.5% lack proper plumbing. 7.5% of households are severely overcrowded (more than 1.5 persons per room), and 99% of households in this category are severely cost-burdened (paying more than half of their income toward housing costs).

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

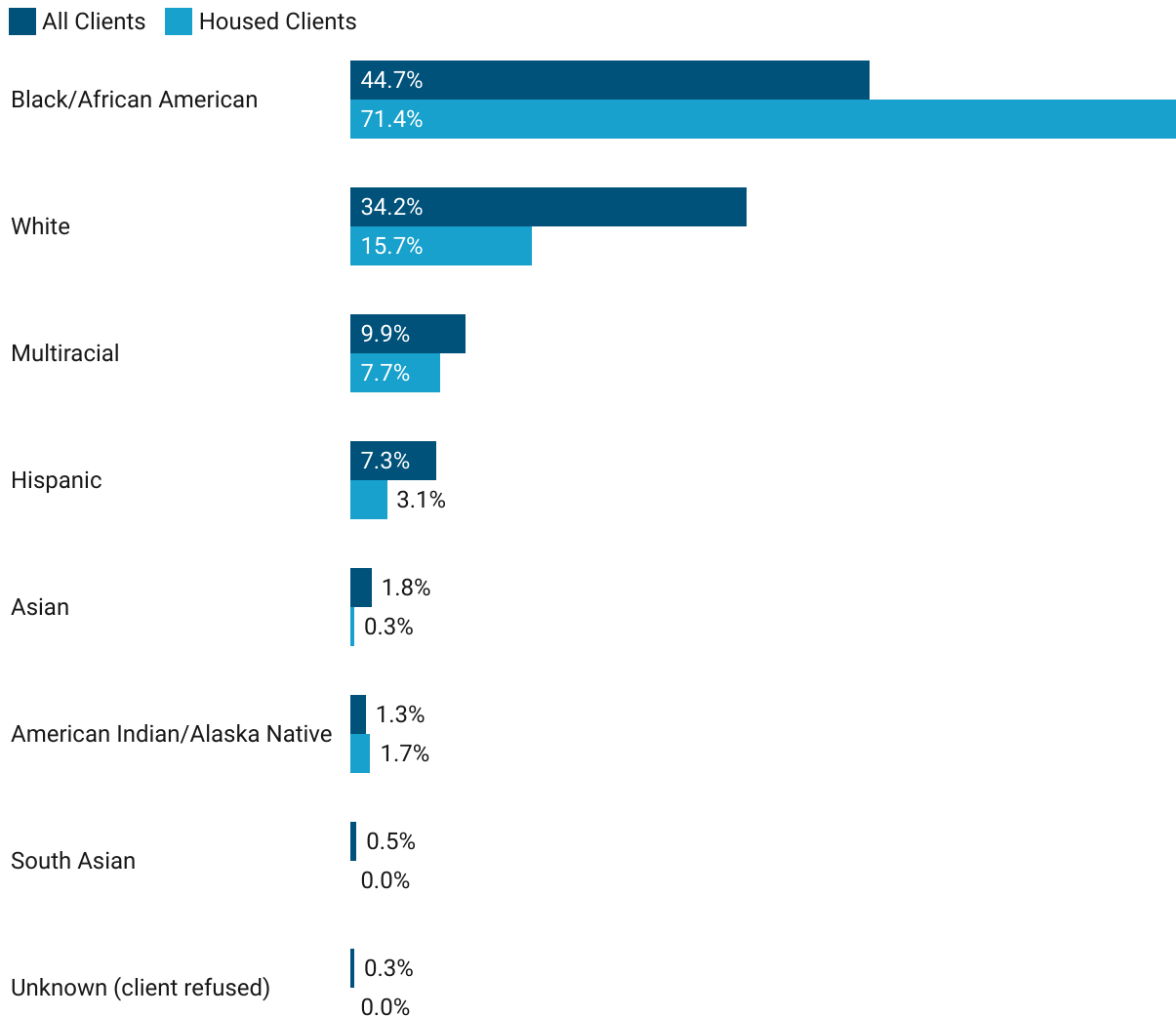
County-level domestic crime data from the Illinois Uniform Crime Reports indicate that in 2019 (the most recent year available), Champaign County was ranked fourth in the state for the rate of domestic violence (1525.6 annual incidents per 100,000 people). When looking at previous years' data, Champaign County was sixth for the 5-year average rate (1452.68 per 100,000), and fourth for the 10-year average rate (1532.17 per 100,000). These rankings indicate that the Urbana HOME Consortium jurisdiction (which represents 93.8% of Champaign County's population) is extremely likely to see substantially higher rates of domestic violence than Illinois at large.

Client data from Courage Connection, the primary domestic violence service provider in the area, provides further information on those fleeing domestic violence situations. All of the following data is taken from the Fiscal Year 2021 and includes data for all client services, as well as for residential programs (emergency shelter and transitional housing) specifically.

During this time, Courage Connection served 619 total clients; 472 adults and 147 children. 127 adults and 101 children were served through emergency shelter, and 28 adults and 31 children were served through transitional housing.

Eighty-four percent of total clients served were female, 15% were male, 0.5% were transgender, and 0.2% were genderqueer (for housing clients, the proportions were 79% female, 20% male, and 0.7% transgender). 45% of all clients were Black/African American, followed by 34% white, 10% multiracial, 7% Hispanic, and less than 2% for all other categories. Of clients receiving housing, 71% were Black/African American, 16% were white, 8% were multiracial, 3% were Hispanic, and the remaining categories were less than 2% of the client base.

## Racial and Ethnic Makeup of Clients (percent)



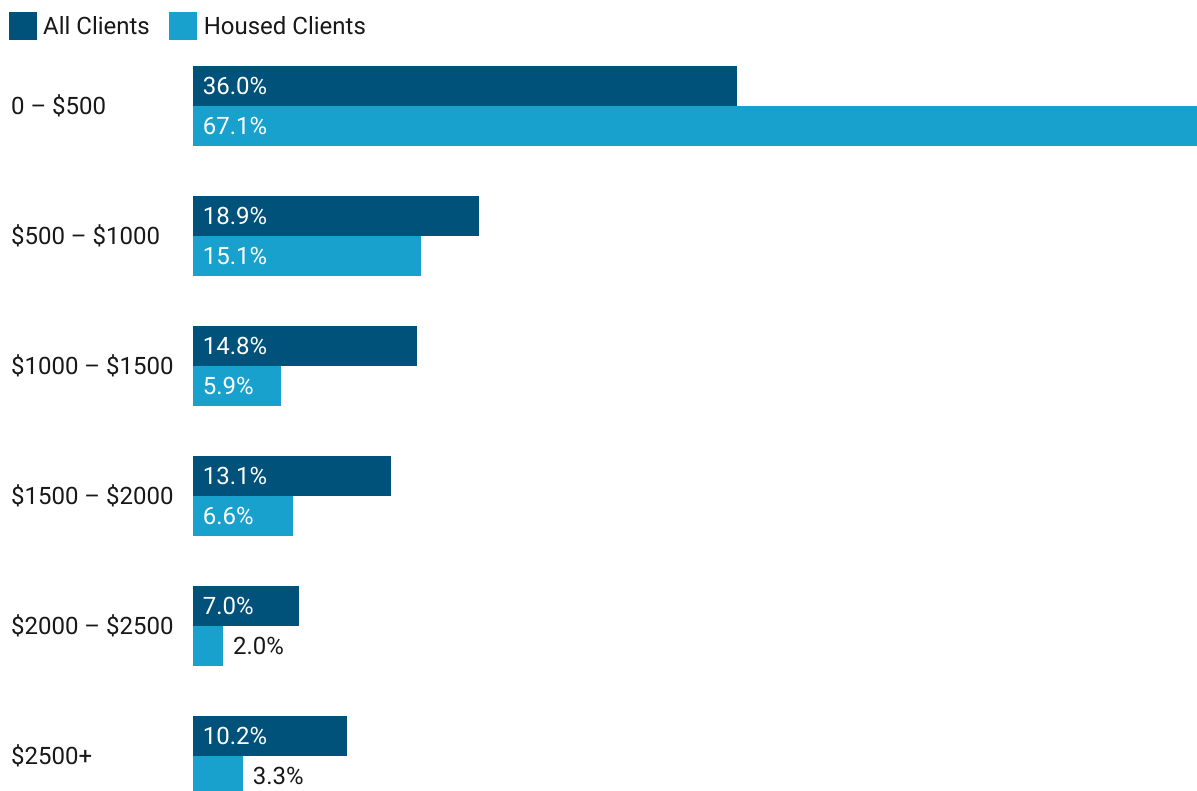
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**FIGURE 14 – RACIAL AND ETHNIC MAKEUP OF COURAGE CONNECTION CLIENTS, FY2021**

61% of households served included adults with children, while 39% were adult-only (housing clients had similar proportions, 65% with children and 35% adult-only). 6% of all clients and 1% of housing clients did not speak English as their primary language. Monthly income data can be seen in the graph below, with a third of all client households and two-thirds of housed client households making less than \$500 a month, and 55% of total and 82% of housed clients making less than \$1000.



## Monthly Income of Client Households (percent)



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**FIGURE 15 – MONTHLY INCOME OF COURAGE CONNECTION CLIENTS, FY2021**

### *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*

Based on a similar methodology to the one discussed in the At-Risk population section (altered only to focus on 30-50% of AMI, rather than <30%), the Urbana HOME Consortium had 1,624 Other Populations households (from here on referred to as Housing Unstable) according to 2011-2015 CHAS. The village of Rantoul had 100 Housing Unstable households in this data vintage, indicating that nearly 94% of Champaign County's Housing Unstable households were in the Urbana HOME Consortium service area.

According to 2016-2020 ACS microdata sources from IPUMS USA, Champaign County had 2,000 Housing Unstable households (defined here as renter households between 30% and 50% of Area Median Income and having one or more of the following severe housing problems: lacking kitchen or complete plumbing, severe overcrowding, severe cost burden).

This population is 47.2% black, 28.3% white, 15.9% Asian or Pacific Islander, with all other groups making up less than 5% each. Hispanic/Latino individuals of any race make up 8.3%

of this population. The average age of an individual living in an At-Risk household is 27.0, while the average age in the county is 35.3. 7.3% of individuals in this group do not speak English well. 83.9% of Other Population individuals are American citizens (compared to 91.7% of county residents). After English—spoken at home in 63.7% of households—the most commonly spoken languages are Spanish (12.9%), Chinese (6.7%), and Sub-Saharan African languages (5.3%).

The average household income for this group is \$23,715, compared to the average county income of \$75,131. 96.2% of individuals 25 or older have a high school diploma or equivalent. Of the adult population, 56.0% are employed, 36.9% are not in the labor force, and 7.1% are unemployed. 1.4% of individuals in this category are veterans. 8.9% of individuals have some type of disability.

The average gross rent (including utilities) for a household in this category is \$1,152 per month. The average household size is 1.8 people. 3.0% of households lack a full kitchen, while none lack proper plumbing. 21.5% of households are severely overcrowded (more than 1.5 persons per room), and 83.8% of households in this category are severely cost-burdened (paying more than half of their income toward housing costs).

Champaign County has a consistently higher rental vacancy rate than the state or county at large, with an estimate of 10.8% in the 2016-2020 ACS survey and 8.0% in the 2011-2015 ACS survey, compared to 5.9% and 6.4% in Illinois and 5.8% and 6.4% nationwide.

According to data compiled by the Eviction Lab at Princeton University, in 2016 (the most recent year for which funding was available) Champaign County had an eviction filing rate of 2.53% (below the Illinois rate of 3.41%) and an eviction rate of 1.44% (below the US rate of 1.58%)

*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:*

HUD's [database of LIHTC](#) properties lists 1,645 low-income units created in Champaign County through LIHTC, with 1,589 units in the last 30 years and 563 units in the last 15 years. In 2021, the Housing Authority of Champaign County administered 2,232 vouchers, including 259 special purpose vouchers.

The 2022 Housing Inventory Count conducted by the Champaign County Continuum of Service Providers to the Homeless lists 292 year-round beds, including 130 emergency shelter beds, 56 transitional housing beds, 100 permanent supportive housing beds, and six rapid rehousing beds.

The City of Champaign Township (serving the City of Champaign), Cunningham Township (serving the City of Urbana), and Champaign County Regional Planning Commission all administer temporary assistance programs for individuals with immediate hardship in paying housing costs.

In addition to population-specific housing and shelter programs, many of which are included in the HIC counts, supportive services provided by consulted organizations included general case management, legal representation, mental health counseling, career counseling, housing transition assistance, and childcare for populations including institutionalized youth, those with HIV/AIDS, those with developmental/intellectual disabilities, veterans, victims of domestic violence, children, the formerly incarcerated, and LGBTQ individuals.

*Describe the unmet housing and service needs of qualifying populations:*

*Homeless as defined in 24 CFR 91.5*

***Affordable Housing***

Consultees described the difficulty for clients in securing affordable and quality housing, noting, among other issues, the rising cost of living, competition of low-income renter households with student renters, high demand for existing income-restricted units, and poor quality of units affordable to low-income households (whether due to building maintenance, size, or location).

These difficulties in accessing affordable housing can lead to short-term crises that result in homelessness or make it difficult for those exiting homelessness to maintain stability.

Over the period that the low-barrier men's and women's shelters were open this winter (December 27, 2021, to April 15, 2022), 2,196 bed nights were provided to men, and 437 to women. Over that time, 1 woman and 23 men were denied a low-barrier bed due to the facility being at its maximum capacity that night. On average, 20 men and four women were served per night.

***Tenant-Based Rental Assistance***

From the consultees, the most commonly expressed unmet TBRA need was a shortage of landlords willing to participate in rental assistance programs. While increased voucher availability would assist low-income renters, increased vouchers during the pandemic faced significant issues with take-up. Finding ways to incentivize participation and effectively discourage source of income discrimination is a significant need.

***Supportive Services***

In general, integrating supportive services more comprehensively into the shelter inventory was identified as a substantial need. In particular, the need for increased mental health and substance addiction services for homeless individuals was echoed throughout the consultations. In addition, consultees expressed the need for ongoing caseworker engagement after clients leave emergency shelter, to ensure that they can maintain stability in their long-term housing.

### ***Non-Congregate Shelter***

As noted in the Consultation section, many service providers noted the lack of a low-barrier, 24/7 year-round emergency shelter for both men and women. Current emergency shelter operations at C-U at Home include many daytime hours when clients are sent out from the facility. The year-round services at this facility also require residents to be sober, while the low-barrier shelter in other facilities is not provided in warm-weather seasons. In addition, providers noted that one organization currently providing the bulk of emergency shelter services can lead to individuals who have been banned or had negative experiences simply not receiving service. Additional emergency shelter facilities would help alleviate this problem. As of spring of 2022, City of Champaign Township has developed a plan to offer low-barrier, shelter, starting fall of 2022, which will address much of this need. In addition to this increase in services, non-congregate shelter facilities, in particular, would allow for the safety and flexibility of private rooms, allowing for a variety of genders, household types (families, in addition to individuals), and current conditions to be served, while minimizing disruption or safety concerns for other residents that come with the congregate shelter format.

### ***At-Risk of Homelessness as defined in 24 CFR 91.5***

#### ***Affordable Housing***

At 30% of the Area Median Income, affordable gross rent per month would be \$627. The average rent in Champaign County is \$936. There are 17,858 households in the county making 30% of AMI or less, while only 7,209 units are being rented at an affordable rent for this group. Among units with a gross rent of \$627 or below, nearly a third of these (32%) are more than 50 years old, suggesting the likelihood of maintenance and other issues due to age.

As described above, the rising cost of living, competition of low-income renter households with student renters, high demand for existing income-restricted units, and poor quality of units affordable to low-income households (whether due to building maintenance, size, or location) make it difficult for low-income households to attain and secure affordable housing and can contribute directly to issues like cost burden and overcrowding that put households at risk.

#### ***Tenant-Based Rental Assistance***

As expressed above, the most discussed problem with rental assistance (applicable to all QPs) was the shortage of landlords willing to participate in rental assistance programs, while inadequate rental assistance availability was also a commonly-discussed problem.

### ***Supportive Services***

Greater awareness of rights and services—including tenant rights and guidance in applying for financial assistance—can help prevent low-income households from reaching homelessness. However, organizations often lack the staffing in resources for this proactive outreach and guidance.

### ***Non-Congregate Shelter***

Consultees mentioned a delay in the process of securing financial assistance for households in a crisis. Non-congregate and low-barrier shelter can provide an additional option to provide immediate assistance, especially for households larger than individuals.

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

### ***Affordable Housing***

As described in the previous section, the rising cost of living, competition of low-income renter households with student renters, high demand for existing income-restricted units, and poor quality of units affordable to low-income households (whether due to building maintenance, size, or location) make it difficult for low-income households to attain and secure affordable housing. These constraints can limit the options available to households fleeing domestic violence.

### ***Tenant-Based Rental Assistance***

As expressed above, the most discussed problem with rental assistance (applicable to all QPs) was the shortage of landlords willing to participate in rental assistance programs, while inadequate rental assistance availability was also a commonly-discussed problem.

### ***Supportive Services***

Similar to the needs of homeless individuals, those fleeing domestic violence often benefit from long-term casework including assistance in securing new housing, income, and mental health counseling. Interventions and assistance for all family members, including children, can have long-term impacts and prevent cycles of violence.

### ***Non-Congregate Shelter***

As noted in the homeless section, non-congregate shelter would allow for more flexibility in emergency shelter clientele. This can allow for parents and children fleeing domestic violence to access emergency shelter together, rather than being split between services and facilities. Similarly, this format could avoid the need to segregate emergency shelter by gender.

### ***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***

### ***Affordable Housing***

At 50% of the Area Median Income, affordable gross rent per month would be \$1045. The average rent in Champaign County is \$936. There are 25,586 households in the county making 50% of AMI or less and 27,227 units being rented at an affordable rent for this group. Among units with a gross rent of \$1045 or below, nearly a third of these (33%) are more than 50 years old, suggesting the likelihood of maintenance and other issues due to age.

The Housing Authority of Champaign County's combined waitlist for vouchers (both tenant-based and project-based) includes 5,431 applicants, as of June 2022. These applicant households represent 10,453 individual household members. Twenty-six percent of applicants are disabled or handicapped. Twelve percent of waitlist applicants are age 65 or older, while 15% are 25 or younger. Fifty-three percent of applicants were single-individual households. Forty-two percent of applicants had one or more dependent. Ninety percent of these dependent households only featured one non-dependent adult (representing 38% of all households). Seventy-eight percent of waitlist applicants are female and 22% are male.

As described above, the rising cost of living, competition of low-income renter households with student renters, high demand for existing income-restricted units, and poor quality of units affordable to low-income households (whether due to building maintenance, size, or location) make it difficult for low-income households to attain and secure affordable housing and can contribute directly to issues like cost burden and overcrowding that put households at risk.

### ***Tenant-Based Rental Assistance***

As expressed above, the most discussed problem with rental assistance (applicable to all QPs) was the shortage of landlords willing to participate in rental assistance programs, while inadequate rental assistance availability was also a commonly-discussed problem.

### ***Supportive Services***

Greater awareness of rights and services—including tenant rights and guidance in applying for financial assistance—can help low-income households from reaching homelessness. However, organizations often lack the staffing and resources for this proactive outreach and guidance.

In addition, the vulnerable population of those with developmental or intellectual disabilities often require long-term case management to maintain stability and independence, but staffing for this assistance is frequently difficult, as described with other supportive services as well.

### ***Non-Congregate Shelter***

The current gendered congregate emergency shelter set-up provides a problem for non-binary individuals that could be alleviated by private facilities.

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

Based on the gap analysis tables provided above, the most significant gap is in affordable housing for At-Risk households, for whom there is a 7,600-unit gap. The CHAS data used for this table indicates that there are only enough affordable units for 20.7% of this population. As previously mentioned, the other data from the needs assessment table does not show significant gaps, but looking at homeless populations and beds as a whole can overlook shortages in shelter that exist at a certain point in time or for certain population groups, leading to an overestimating of shelter capacity.

As discussed in the Consultation section, the following populations were mentioned specifically when discussing gaps in current service provision.

- Sex Offenders (mentioned three times)
- Immigrants (mentioned twice)
- High Medical Need Homeless (mentioned twice)
- Disabled Head of Household (mentioned twice)
- Women and Children (mentioned twice)
- Rural/Outlying Population
- At-Risk of Homelessness
- Work Requirement Excluded
- VASH Exiting
- LGBT
- Chronically Homeless
- Formerly Incarcerated

Offering greater assistance in navigating the service provision and application process was also identified by service providers as a major gap. Hiring and retaining the staffing to provide all the direct services that are needed, as well as pursuing funding and ensuring compliance, was also a gap many organizations felt acutely.

*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:*

N/A

*Identify priority needs for qualifying populations:*

### ***Homeless***

Providing shelter facilities that are low-barrier, 24/7, and open to a variety of household structures and identities is the greatest need, to ensure that no one is required to spend a night on the street and that households can remain together. In addition, providing supportive services to build and maintain stability, from emergency shelter to permanent housing, is a priority for homeless individuals.

### ***At-Risk of Homelessness***

For those at-risk of homelessness, supportive services are the highest priority, to address the vulnerabilities that the household has and prevent them from sliding into homelessness. In addition, affordable housing is important to address affordability issues that place the household at risk, as is an emergency shelter that provides safe housing if their condition does change from at-risk to homeless.

### ***Victims of Domestic Violence***

Emergency shelter facilities that provide safe shelter to a whole household fleeing domestic violence (whether an individual or an adult with multiple children), as well as ongoing counseling and supportive services are priority needs for those fleeing domestic violence.

### ***Other Populations***

Providing increased affordable housing opportunities for low-income households is the priority need for this group, in addition to services to help them locate these opportunities.



*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 identify gaps and needs, this plan analyzed quantitative data from the state and federal government (eg. Comprehensive Housing Affordability Strategy, American Community Survey), along with data gathered from local service providers and institutions (Point in Time Count, Housing Inventory Count, annual organizational reporting). While this data presented a helpful picture, it was also supplemented by qualitative interviews and surveys from local experts and service providers, as well as the general public. These data sources provided an on-the-ground view of local needs and helped to fill in gaps in the quantitative data. Taken together, these various data sources provided a holistic view into the local qualified populations and their particular needs.

## HOME-ARP Activities

### **Template:**

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

The City of Urbana, the lead agency of the Urbana HOME Consortium, will administer a request for proposal (RFP) process once the HOME-ARP Allocation Plan is approved by HUD. This RFP process will be administered using platforms already in use by the city and will allow applicants to state their requested funding amount, indicate which HOME-ARP activity (or list of activities) the funds will be used for, and state how their proposal will meet the needs articulated in this plan.

*Describe whether the PJ will administer eligible activities directly:*

The Urbana HOME Consortium will not administer any eligible activities directly. Individual agencies composing the consortium (the City of Champaign, the City of Urbana, Champaign County Regional Planning Commission) will be eligible to respond to the request for proposals, but staff from these organizations will not be involved in the selection process for any proposals for which they are involved or in competition.

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

On March 3<sup>rd</sup>, 2022, the City of Urbana entered into an agreement with Champaign County Regional Planning Commission (CCRPC) for CCRPC to create the HOME-ARP Allocation Plan, for an amount not to exceed \$50,000. While the funding for this agreement will come from the HOME-ARP Administration funds, the scope of this contract is not for full HOME-ARP program administration, but simply the creation of this Allocation Plan document.

*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.*

**Template:**

**Use of HOME-ARP Funding**

	<b>Funding Amount</b>	<b>Percent of the Grant</b>	<b>Statutory Limit</b>
Supportive Services	\$ 1,000,000		
Acquisition and Development of Non-Congregate Shelters	\$ 400,000		
Tenant Based Rental Assistance (TBRA)	\$ 0		
Development of Affordable Rental Housing	\$ 1,000,000		
Non-Profit Operating	\$ 148,538	5 %	5%
Non-Profit Capacity Building	\$ 148,538	5 %	5%
Administration and Planning	\$ 273,697	9 %	15%
<b>Total HOME ARP Allocation</b>	<b>\$ 2,970,773</b>		

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

The Urbana HOME Consortium will allocate its HOME-ARP funds to three of the eligible activity areas—\$1 million each to Supportive Services and Affordable Rental Housing, and \$400,00 toward Non-Congregate Shelter. The remaining funds will go toward the administering and planning of the HOME-ARP funds, as well as providing the infrastructure for recipient organizations to administer services, including through capacity building, staffing, and other expenses for effectively delivering the funded services. This funding allocation will allow the Consortium to address underlying issues in the local context (including the affordable housing supply, and the underlying struggles that qualified populations are coping with and contribute to instability). Investments in case management and other supportive services will allow the funding to serve the distinct needs of the many vulnerable populations in our community (as described in the consultation process), as will non-congregate shelter, as it provides the flexibility of safe shelter for a variety of household compositions and identities that is difficult in congregate shelter.

*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:*

The extensive network of local service providers—coupled with the staffing, capacity, and other funding limitations that these providers face—encouraged the investment in supportive services,

providing ways to build upon existing infrastructure and offer a greater depth and breadth of services to community members in need of this support to regain stability. Similarly, the large gap in housing affordable for qualified populations, coupled with issues in existing private housing (including affordability, quality, and willingness to rent to qualified populations) led to significant investment in creating affordable housing units that would serve these populations.

Throughout the HOME-ARP allocation planning process, other efforts by local governments included City of Champaign Township undertaking responsibility for administering a low-barrier emergency shelter in the community, with funding assistance from the City of Champaign, starting in November of 2022. This development addresses some of the urgent low-barrier shelter needs mentioned in the consultation process. However, it does not minimize the unique benefits that non-congregate shelter would provide when compared to congregate shelter. For that reason, the Consortium is allocating funds toward the development of non-congregate shelter. These funds, along with other HOME-ARP funds, provide a foundational investment that can be supplemented with other complementary funding, including annual HOME allocations, partnerships with local governments, and future grant opportunities.

Previously-mentioned struggles to place tenant-based rental assistance recipients discouraged the Urbana HOME Consortium from allocating funds to this activity. Instead, the consortium elected to focus on the supply side of the local housing shortage (through investments in affordable housing and non-congregate shelter), as well as providing non-housing assistance to address other underlying issues for qualified populations. In addition, supportive funds can be used for many of the programming ideas respondents provided for TBRA (including moving assistance and rental assistance for up to two years), as well as funding landlord outreach and other initiatives that could improve the efficacy of existing TBRA programs. Finally, TBRA programs are an eligible activity for annual HOME allocations, while other programming areas for HOME-ARP funding are not eligible for this regular HOME funding. Because of this, emphasis has been placed on funding programming that is not eligible for regular HOME funding.

## HOME-ARP Production Housing Goals

### **Template**

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

Using the \$1 million it has allocated toward Affordable Rental Housing, the Urbana HOME Consortium will produce 4 new affordable housing units at \$250,000 each. This is in line with [HUD guidance](#) on maximum HOME per-unit costs, where a 2-bedroom elevator unit can cost up to \$250,530. In addition, Bristol Place, a recent affordable housing development in the community, was a 90-unit single-family and townhome development with a total budget of \$23 million, dividing out to approximately \$256,000 per unit.

If this HOME-ARP funding is spent on renovating existing housing, then the Consortium estimates that it could renovate 15 housing units (using inflation-adjusted estimates from [this source](#)).

*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:*

As described in the consultation process, the affordable housing produced with HOME-ARP funding will address the lack of area housing that is simultaneously affordable, high quality, accessible, and available to low-income households or those seeking public assistance. Building brand new units funded through HOME-ARP would ensure that all of these attributes are met, while renovations would more significantly increase the number of quality affordable housing units.

## 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).*

### **Template:**

*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:*

Households belonging to the Homeless and At-Risk of Homelessness Qualified Populations will receive priority in HOME-ARP-funded programs.

*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:*

Providing a preference for Homeless and At-Risk of Homelessness households will allow for effective and timely provision of services to these groups, addressing the immediate needs of homeless households and providing the necessary interventions to prevent at-risk households from reaching the point of homelessness. In cooperation with existing homelessness services and other capacity-building efforts occurring locally, prioritization of services for homeless households will ensure that facilities exist to house the specific households in need (including low-barrier facilities, those for families, or others who are not able to stay in congregate shelter), connect the individuals with these services, and provide further supports to achieve and sustain stability. Similarly, due to the estimated 9,583 at-risk households in the county, and the 7,600-unit gap in affordable housing for these households, prompt intervention is key to help connect these households with the assistance that they need to regain stability.

## 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).*

### **Template:**

*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):*

To ensure that all qualified populations are eligible and that HOME-ARP-funded programming is in compliance with HOME-ARP guidance, each funded program will use its own specific application process. These applications will follow a first-come, first-served process for qualified



applicants, with the exception of the two preference populations (Homeless and At-Risk of Homelessness) being moved to the top of the list.

***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):***

N/A

***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):***

N/A

***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):***

N/A

## 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.*

### **Template**

***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:***

The Urbana HOME Consortium will not utilize any limitations for its HOME-ARP-funded projects.

***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*

Refinancing cannot be the primary purpose of the HOME investment. Refinancing is only appropriate when HOME funds are loaned to rehabilitate the property for which refinancing is being requested and then only when necessary to permit or ensure continued affordability. To demonstrate that rehabilitation is the primary activity for which HOME funds have been expended in connection with the property, at least \$5,000 per unit average in HOME funds must have been provided for rehabilitation of the property.

- *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.*

The project sponsor requesting HOME funds for debt refinancing must demonstrate, and the Consortium must confirm, that disinvestment in the property has not occurred, long-term needs of the project can be met through the refinancing, and servicing the targeted population over an extended affordability period is feasible.

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

Refinancing may be approved either to maintain current affordable units or to create additional affordable units.

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

Properties for which refinancing is approved are subject to an affordability period of at least 15 years starting on the date the refinancing is closed.

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


HOME funds cannot be used to refinance multiple-family loans made or insured by any other federal program, including but not limited to, the Community Development Block Grant Program.

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

Properties for which refinancing is approved may be located anywhere within the corporate limits of the Consortium members.

## Appendix

### Attachment A—Draft Plan Public Hearing Notice



*- PUBLIC HEARING NOTICE -*

**NOTICE OF AVAILABILITY FOR PUBLIC REVIEW & COMMENT**


**CITY OF URBANA & URBANA HOME CONSORTIUM**

**AMENDMENT TO ANNUAL ACTION PLAN FY 2020-2021**

**PUBLIC HEARING AT 7 PM, MONDAY, JULY 18 2022 AND**

**6 PM TUESDAY, JULY 26 AT THE**

**URBANA CITY BUILDING, 400 SOUTH VINE STREET, URBANA**



Copies of the Draft FY 2020-2021 HOME ARP Allocation Plan will be available for review to the general public between Thursday June 30, 2022 and Friday July 29, 2022 at the following locations:

• Urbana City Clerk's Office, 400 S. Vine Street	• Community Development Services, 400 S. Vine Street
• Urbana Free Library, 201 S. Race Street	• On the City of Urbana's website at <a href="http://www.urbanainillinois.us">www.urbanainillinois.us</a>

The purpose of the hearings are to receive comments and suggestions on the amendment to the FY 20/21 Annual Action Plan to include the HOME ARP Allocation of \$2,970,773. Persons with disabilities needing services for this hearing should contact Grants Management Division at 384-2447 (TDD 384-2360), or the City's Americans With Disabilities Act Coordinator at 384-2466.

The HOME ARP Allocation Plan is the Urbana HOME Consortium's budget which will assist individuals or households who are homeless, at risk of homelessness, by providing permanent housing, supportive services, and non-congregate shelter, to reduce homelessness and increase housing stability within Champaign County. The plan identifies any preferences being established for eligible activities or projects Community Development Block Grant (CDBG) Programs. The Plan also includes budgets for HOME Programs by the Cities of Champaign and Urbana, and Champaign County, which make up the Urbana HOME Consortium.

Submit written comments to the City of Urbana, Grants Management Division, 400 South Vine Street, Urbana, IL 61801 or by e-mail to [grants@urbanainillinois.us](mailto:grants@urbanainillinois.us) before the close of business on Friday, July 29, 2022.

## Attachment B – Public Comment

July 6, 2022

City of Champaign

Attn: Mayor Deborah Frank Feinen

Attn: City of Champaign Council Members

102 N. Neil Street

Champaign IL 61820

Dear City of Champaign Mayor and Councilpersons and all others:

Greetings everyone. May the grace and peace of Jesus our Lord be with you all. I am currently typing this to you in my vehicle which, on this “feels like 111\* degree day” (yesterday) is actually quite brutal. I am taking time out to write to you today on a most pressing matter of importance to me.

You recently requested input from Champaign residents regarding how to most effectively dispense Federal monies you received for purposes of homeless outreach and homelessness prevention efforts in Champaign IL. As a current person living in Champaign, I felt compelled to provide you with my input on this very crucial topic. And I’m sorry that my multiple page letter of my thoughts on the topic did not fit nicely into your “limited words” portal set up for this official feedback. Nevertheless, I am hopeful you will ‘hear me’ on this topic despite my alternative method of communication with you.

As someone who personally experienced first time homelessness at the age of 50 in March 2020 due a nearly fatal case of COVID19, I can assure you that how you are ALREADY planning to allocate these Federal funds you recently received is all wrong. Completely wrong. I know of what I speak herein, as I already walked this path personally and realized that the homeless outreach systems in IL are largely a fraud, a shell game where the vulnerable trapped in the system never receive any measurable help ever while those pretending to help them line their own pockets with government cash. For I now have pointedly observed a common theme: there exists virtually no human suffering around which a nonprofit doesn’t prop itself up in and around said suffering clamoring for government grant money yet never effectively helping those they pretend to serve - EVER. This grant money is ALWAYS wasted on “outside consultants” and paying the already bloated administrative salaries and bonuses of those in charge pretending to do “the real work” in this regard. Pro-Tip: Paid outside consultants will only tell you what hourly wage social workers doing this work on the daily have already been telling you for years is needed in this system.

And you need only look so far as Springfield IL to see how their Mayor Langfelder wholly regrets his decision to hire “an outsider consultant from Waukegan to tell him what he did not want to hear” on the topic.

I’ve watched this bewilderingly broken homeless outreach system repeat itself over and over again throughout seven (7) towns in IL now - so it’s not like I do not speak from a place of informed knowledge and experience on this topic. And my only conclusion after so much first-hand observation is this: something THIS broken can only be so - intentionally and by design.

By way of background, I lived a largely affluent and privileged life prior to 2020 possessing multiple advanced degrees and never once worried about money or housing. I worked in the law for 25 years and then did in-home elder care for 10 years therea er caring for my veteran father until his death in 2019. I also happen to have Huntington's Disease and am currently considered pre-symptomatic and fully disabled. My family is a family of veterans and we are from IL - Staunton IL, to be specific, in Macoupin County. I tell you these details so that you will not dismiss me "out of hand" as an outsider who knows nothing about Champaign IL specifically or IL generally. For, I assure you, that I am one of you.

I have been watching, learning, researching and being horrified at the LACK of appropriate resources for our unhoused neighbors here in Champaign for over six (6) full months now. I have intently observed and thoroughly researched the services that are available here for We the Unhoused and what the local services/resources \*actually do\* AND FAIL TO DO in this Community. Please know that it is not my intention to destroy or devastate the efforts that are already in place; but rather, to talk to you about the PERCEPTION of those efforts - or lack thereof - from someone relatively new to Champaign.

Please allow me to share my first-person observations with you:

1. C-U at Home, arguably the largest nonprofit propping themselves up around the homeless cause here in Champaign, should be awarded ZERO dollars of the new money available currently for homeless outreach. When I arrived here in December 2021 a er fleeing LANDLORD domestic violence & corresponding Pandemic IHDA Rental Assistance Funds the by the same bad actor landlord, I almost immediately began seeing the "One Winter's Night" commercials on TV for C-UatHome's One Winter's Night February 2022 Fundraiser. I don't know who told them that "cosplaying being homeless for an evening in a cardboard box on a parking lot" while intermittently going indoors TO WARM UP and eat something was a GOOD idea - but they were sadly, grossly misinformed.

Also, LANGUAGE MATTERS: There seems to be an intentional effort to TRY and be "culturally sensitive" here in Champaign when referring to this burgeoning social crisis by using inadvertently outrageously offensive terms like "for our friends without an address." Tell me honestly: Would you EVER want to be defined in any way that labels YOU as "being WITHOUT" in any kind of capacity? How about "our unhoused neighbors" or "our neighbors experiencing housing insecurity" because literally ANYTHING would be BETTER than defining us as "being WITHOUT" something everyone else has. Shame on those people. Shame.

#### RECOMMENDATION:

Consider alternatives to congregate shelters which do not and cannot serve the needs of the elderly or disabled or neurodivergent homeless folks. I say this because this is statistically the fastest growing segment of the unhoused population and the most vulnerable to die from the trauma of street homelessness and/or the violence of shelters. HELP US. Put in place "Rapid Rehousing" for people over 50 with disabilities who may or may not be able to work a regular job AT ALL. There is a large sub-set of the unhoused population who simply cannot LIVE in a congregate shelter FOR A VARIETY OF LEGITIMATE REASONS. HELP US ANYWAY. C-UatHome labels us "treatment resistant" or "too difficult to house" and literally told me "people like you just fall through the cracks (of the supposed social safety net) all the



time.” I’m sorry...what? Define “fall through the cracks.” YOU KNOW exactly what that means. Certain death for those most vulnerable. Why make up code terms for the reality you willingly cause by your own failed outreach and inaccessible & inappropriate shelter system here? We will die because you make bad decisions on this topic and all the while you will comfort yourselves by saying “Well we can’t save them all.” Yes you can. I can absolutely show you HOW. It’s a moral choice to continue to intentionally fail us.

Use the money you’ve been given to pay for a “homeless hotel immediate shelter housing program” and work with area hotels to make those dollars stretch the most and for vastly extended periods of time until permanent housing can be secured.. I realize this town is SOLD OUT in terms of hotel rooms when Illini sporting events or really ANY EVENT connected to the University is scheduled. This means you will need to do some creative problem-solving in terms of this concept. Eastland Hotel in Urbana sits largely empty the majority of the year and only fills when all other hotels reach full occupancy capacity in C-U due to area events. Implement a hotel program for rapid secure housing WITH Eastland Hotel. They are quite affordable and would likely give the City a huge discount as they would rather be all the way full all of the year than largely empty most of the year.

Many of this area's homeless ARE disabled but have YEARS to wait for social security to approve their disability payments. And the huge disconnect is: until they are approved for SSD/SSI they simply do not qualify for most subsidized or affordable housing. As a result, they are left to languish on the streets spiraling from one medical crisis to their next mental health crisis because most of you cannot even FATHOM the trauma that street homelessness inflicts on a person and how it so rapidly deteriorates one’s mental state and physical body. How is this any kind of HUMANE way to treat people who have the misfortune to be rendered disabled in this life? And now with post-COVID longhaul disabling so many long-term, this problem is only going to grow exponentially worse. You must get in front of this slow-motion social catastrophe and have plans in place to help those in need. Because you currently absolutely do NOT have the appropriate social support undercarriage to help these folks.

Also, I would like to dispel a homeless MYTH right here in order to dispense with its absurdity so you will hopefully see us as WORTHY OF DIGNITY AND RESPECT. Most people believe all homeless people are drug/alcohol addicts. Statistically, this is untrue. But I can tell you the trauma of homelessness causes addiction; addiction rarely causes homelessness which is what people believe happens. As if, suffering from substance abuse disorder is JUST CAUSE to deny anyone needed assistance. I never once took drugs in this three (3) year long Pandemic nightmare to self-medicate or help attenuate my cumulative traumas.

Instead, I chose to find meaning in my suffering, lean closer to God and my faith and turn my pain into my power and my platform.

To a newcomer here, it feels very much like C-U is sending a silent message of “if you aren’t here for the University, then C-U is not here for you.” Are you aware that many of our unhoused neighbors here in Champaign are amazingly gifted artists, writers, artisans, cooks, musicians and so many of them could teach a Master Class on frugality, radical resilience, extreme survival techniques and heroic DIY life hacks for those forced to survive on their own and on the streets? Do you realize how much untapped value and human capital they could add to this Community if only given the safety of 4 walls around them, the ability to eat and shower daily and not have to struggle just to EXIST every single hour of every single day? You have written us off as WITHOUT VALUE and nothing but a visible blight on your community

and an unwanted monetary burden on your local wallet. PLEASE DON'T DO THAT. We matter. Our lives matter. Our ability to contribute matters as does our longing and need to be included in the larger fabric of the community here in Champaign.

HERE'S WHAT YOU SHOULD NOT DO: Don't be like the

aforementioned Springfield IL who literally paid for a "homeless expert consultant" to come evaluate their "homeless crisis" and make recommendations. He did that and his recommendations were spot-on brilliant; but the Mayor who hired the guy in the first instance did not approve of his own paid expert's recommendations. As a result, Mayor Langfelder literally ran the guy out of town and never implemented ANY of his suggestions or recommendations. Why? Because unbeknownst to the hired consultant, the Mayor actually hired the man to parrot Mayor Langfelder's already predetermined solution of yet another FAILED CONGREGATE SHELTER. In Springfield. Springfield already has five (5) congregate homeless shelters and their unhoused community INSTEAD inhabit their own created "tent city" - choosing intentionally to instead live RIGHT IN FRONT OF the Salvation Army's congregate homeless shelter. What does that tell you about how horrifying most congregate homeless shelters are to the persons experiencing housing challenges? I can tell you from first-hand experience I will never enter another one because the very first thing those shelters make you relinquish is your DIGNITY and then your HUMANITY and then your bodily AUTONOMY and then your AGENCY. I have many other reasons WHY I will never willfully enter another homeless shelter not the least of which is the one that I did enter stole most of my belongings including my Huntington's medications AND gave me BED BUGS which then cost me my hard-to-find housing I secured therea er because the whole debacle enraged my new landlord. And rightly so. I have never in my entire privileged life had lice or bed bugs and

I am STILL psychologically scarred from that experience. #NeverAgain

"If you build it - they will come" simply does not apply to the unhoused community and congregate homeless shelters - I absolutely can promise you that truth. The very last thing Springfield needs to do is waste precious dollars on yet ANOTHER failed congregate shelter where they simply warehouse human beings. Any new shelter like that - along with the other 5 congregate homeless shelters in Springfield - will also be intentionally avoided by those experiencing housing insecurity. We do NOT need more congregate shelters that literally NO ONE wants to enter. Do not be like Springfeild. They have chartered a course of certain failure in this regard all while ignoring the alternative recommendations of their hired consultant. Don't be like Springfield.

Because the powers that be in Springfield wanted to shove their unhoused neighbors into a NEW congregate shelter into the outskirts of the janky part of town so they will be out of sight out of mind all to appease and please the NIMBY crowd and future voters. And what did their

"homelessness expert consultant" actually recommend instead of

ANOTHER failed congregate shelter? That every single neighborhood in Springfield absorb 2-3 of those folks experiencing homelessness in Springfield and include them as part of their street, part of their neighborhood, part of their community, part of their own system of caring for one another. And all the NIMBYs cried foul. Sure - everyone loves the homeless cause - until OUR NEED shows up on their privileged street. At the time, Springfield was dealing with roughly 100 unhoused people. They could have so EASILY implemented that hired expert's recommendations and it would have benefitted literally

EVERYONE. He literally told Mayor Langfelder: “You are trying to build an entire truck when all you need is a trunk to solve your homeless problem here.” If you have the time, please read about this entire fiasco as the Illinois Times newspaper did a fantastic 10 part series on this topic back in 2020 and early 2021. I implore you:

PLEASE DO NOT BE LIKE SPRINGFIELD. Listen to the people who can give you the most successful ideas borne of actual lived experience. Or - go ahead and be like Springfield - and just keep hoping your unhoused neighbors here in Champaign will feel your palpable “unwantedness” of us here and that “undercurrent of rejection” will cause us to move on down the road to some other town or some other County and be THEIR problem instead of yours. It’s your choice. But it’s ALSO your spiritual blessing or your moral failing in how you choose to move forward on this critical issue. God is watching and hoping you choose to help the poor, the homeless, the widows, the disabled, the orphaned and the traumatized. Be the hope that God continues to long for in humanity today, Champaign.

3. Create a SAFE-PARK Parking Lot in Champaign: Your last “best estimate” in 2020 of the number of unhoused you had in Champaign was 90 people. I am here to inform you that JUST THAT MANY OF US are living in our vehicles at the local Walmarts. You cannot simply “count those at CUatHome” and say that is your “official” homeless number. Had you given an HONEST & ACCURATE number, you would have gotten even more funds to allocate to this emerging public health crisis. There are people living in cars who hang out at Starbucks, McDonalds and the libraries during the day for the free wi-fi. I can tell you that you easily have 100 unhoused people living in their vehicles just up at Prospect Point alone. But you already KNOW THIS. You don’t count us because you have written us off “as the drunkards and drug addicts who won’t abide CUatHome’s Strict Shelter Rules.” For the record, that is not who the large majority of us are. I can neither drink nor do drugs because of my Huntington’s Disease which causes balance and motor skills coordination issues. I have NEVER been an addict of anything - unless you count me writing my futile emails to local politicians as my addiction. And truthfully - that might be fair.

But know this: I tried to park in CUatHome’s parking lot one night hoping it would be a safe place for a single female to dwell and they threatened to call the cops on me. They said I either had to enter their shelter or leave their property. Again I ask you: What would Jesus Do? And again I tell you: Award CUatHome Zero \$0 Dollars of the funds allocated for this cause. If they think their cosplay performative theater is such a tremendous success and such a GREAT FUNDRAISER for them - let them exist on such folly events alone. It’s what they deserve.

We need a Safe-Park Parking Lot here in Champaign - where we can lawfully be in our cars any of the 24 hours in a day. Where the housing caseworkers, medical, voc rehab, PACE people COME TO US and assess our most urgent needs IN OUR COMFORT ZONE. If you are intent on doing this work successfully and effectively you MUST MEET PEOPLE WHERE THEY ARE. If you do not know what a Safe-Park Parking Lot is look it up. Google will tell you. I literally could not believe that a progressive Uni town like Champaign did not already have this critical resource in place.

But then - having an “official safe parking lot for your unhoused neighbors” would just be a very PUBLIC ADMISSION that you are failing so many in this Community who are experiencing housing insecurity. Rents are skyrocketing. People cannot afford to eat AND have a home right now. Evictions are happening at unprecedented numbers leaving people “unrentable” for the next 10 years! This problem is only going to grow imminently more grave. BUILD A PLACE FOR US TO BE until we have a place where

we can rebuild our lives and live in a proper home. It's not hard. It's just not politically popular or an issue that directly helps you get re-elected so why bother, am I right?

The hardest part of being a car dweller (defined as someone living in their car as their only housing) is finding a safe, consistent place to park overnight without being ticketed or hassled by the police. Also: Bring in portable showers and the ability to wash clothes, a means to dispose of litter and it won't be nearly as "unsightly awful" as you might imagine. And have someone there like ME who can warn those NEW to car dwelling of the dangers of carbon monoxide poisoning, how to help keep their cars cool or warm here on the prairie depending on the season and how not to die from a blood clot because they don't know NOT to sleep upright in their bucket seats in the front of their car. Knowledge is power. And feeling empowered leads to successful choices and successful choices leads to a brighter future. Help us get to that brighter future. Please.

Also, it IS worth pointing out that I did contact 211 United Way to make absolutely certain this resource of a "safe park parking lot for car dwellers" does not already exist here and I simply somehow just could not locate it. I reached a 211 worker in Chicago who told me, and I quote: "I get so many calls from people in dire straits in Champaign IL and there are literally no resources there. A huge percentage of my calls per shi originate from Champaign IL from people frantically searching for help that simply does not exist there." How much more absolute confirmation do you need than UNITED WAY telling you that you are completely failing us here?

#### 4. ALTERNATIVES TO SHELTERS FOR DOMESTIC

VIOLENCE SURVIVORS: Upon arrival in C-U, I contacted 37 area agencies for help, resources, trauma-informed counseling, rental assistance and other various help those fleeing violence in their domestic setting typically need. I was straight-up told NO by 35 of those area Agencies contacted including, but not limited to, your local DV Shelter "Courage Connection." They informed me that they could not help me because my abuse and violence was not an intimate partner but rather abuse/violence perpetrated by a landlord. That is patently false <legally> as landlords are specifically listed in the IL DV Statute which means Courage Connection had an obligation to assist me yet willfully chose to ignore their duty to help. I trust you have an intern who can research the accuracy of this information I give you herein and pass the same along to Courage Connection. They should be awarded no points for this abhorrent misstatement of facts and mistreatment of a survivor of domestic violence and should be consequently ALSO awarded Zero (\$0) grant dollars for housing the DV homeless in Champaign.

You should all be asking yourselves, at this point, how many others did Courage Connection REFUSE to help, unlawfully, all while holding out their hand for additional grant monies from the money-handlers here in Champaign to line their own pockets and paid salaries? You likely can't handle the truth of those numbers. But I can. Because I've worked with the women they turned away, too, and I personally found them housing. I am doing the job FOR FREE they themselves are refusing to do. Does any of this strike you as utterly absurd and unacceptable? Because it should.

RECOMMENDATION: Build an alternative to Courage Connection

for people they refuse to help. I guarantee you I could set up shop right across the street from them and do a better job. For when you're the only resource in town, what incentive do you have to do anything but bottom basement level inadequate services? Knowing that DV all too often leads to sudden and

abrupt homelessness for the victim when they must flee for their very safety, ALTERNATIVES to nonfunctional “only-game-in-town” and wholly inadequate DV shelters MUST be put in place.

Imagine an old Historic Home with 15 bedrooms and common kitchen areas/shared bathrooms etc. Let there be homes that exist LIKE THAT for the survivors of DV that are - out of sheer stupidity on the part of places like Courage Connection - denied life saving help when they most need it. If you build it, we WILL come. And people like me would absolutely do the job much better than Courage Connection presently does. A communal living home where an employee is a permanent resident there and “informed friend and guiding light” to those adversely impacted by DV needing to rebuild their lives is exactly the type of creative problem solving on this topic Champaign should begin to embrace. You could have such a home coordinate with rapid rehousing caseworkers and trauma-informed psychologists and medical/nutritional professionals to tend to the emotional and physical and dietary needs of the survivors and their children. This can be done. And you might be surprised how little it takes for survivors of unfathomable violence to immediately start to give back to their community. A place like this could nearly run itself for, it is my experience anyway, that there is no force of nature greater on this Earth stronger than a formerly terrorized person determined to rise and thrive once again.

Also: Consider creating a network of “hidden safe houses” separate and away from Courage Connection so that you have an additional community resource to direct disabled and medically vulnerable survivors of DV to THAT network of “alternative housing.” Springfield IL already does this as does Peoria and the MetroEast IL. Why is a progressive University town like C-U not working OUTSIDE the failed DV Shelter system to ensure EVERYONE who needs help and housing following violence in their domestic setting gets the help that they need? There are so many former survivors of DV themselves who freely WILL OPEN THEIR HOMES to women fleeing violence and trying to begin anew. You would be remiss to not access this huge and untapped resource here in C-U. Women will literally line up to help other women get through what they themselves once endured. I know - because I am living proof. The barriers to most DV Shelters are too high anyway. Those barriers would be much lower in a non-congregate setting like a personal residence or even a communal smaller non-shelter type residential group home. Also, be aware that the need for MEN to have access to domestic violence housing and resources is ever-increasing. Be the progressive leaders on this issue and build what is critically needed. Please.

##### 5. EVICTIONS: Evictions cause 10 years of forced homelessness.

A staggering statistic puts “suicide due to Eviction” at close to 20% Nationally. Every rental listing states: “No Evictions” which creates an unnecessary bar to housing and needless homelessness. Find landlords in and around Champaign willing to work with the formerly evicted to get folks back into secure housing. But do NOT let those selected to participate in such a program be bad-actor, predatory landlords who only try to exploit the known vulnerabilities of their tenants for their own gain. THAT is one way human trafficking happens. “Someone with no place else to live and some alleged good guy with a house offering them shelter for free...” Uh huh. Trust me - those predatory creeps are out there and must be vetted OUT of any safe system of housing for the recently evicted. When you realize that DEATH is one of the human cost of evictions, how can you not act to save those caught in that dire system?

Also: Strengthen the tenant union here and the tenant laws to GUARANTEE any tenant who is the subject of an eviction, illegal or legal, has qualified and competent legal representation at Court. I would literally VOLUNTEER my time and my considerable legal expertise in this area to such a local community

resource. Make mediation with landlords mandatory. End ALL expedited evictions. There are literally dozens of ideas I could give to you in this regard but I am certain you get the concept by now.

#### 6. GIVE THE MONEY DIRECTLY TO THOSE EXPERIENCING

#### HOUSING INSECURITY - NO PAPERWORK, NO RIDICULOUS RULES

AND DISQUALIFIERS. Other cities and towns have done this with tremendous success. Obviously, you would need someone qualified to vet our unhoused neighbors who would participate in such a pilot program for Champaign as I wouldn't recommend giving the money to active addicts or people refusing to actively rebuild their life. But people like me? Give me six months paid in full rent RIGHT NOW and you would be amazed at how much time that would free up for me to GIVE BACK TO CHAMPAIGN via working to implement any one of these proposals herein. If I have housing security for the next six (6) months - you literally have a full-time

INFORMED volunteer willing to do the hard work of making some or all of these ideas come to fruition here in Champaign. But absent that assistance, I am likely to be full-time homeless AGAIN by the end of August 2022. Which brings me to my next background points about MY experience here in C-U...

I applied for and was denied LOCAL Rental Assistance by both RCP and Cunningham Township despite giving them all of the requested information and completing their cumbersome and voluminous application. Moving forward, it would be helpful if they stated UP FRONT that they deem only certain people "worthy" of their financial assistance. Seriously - force them to PUBLISH & POST all of their many insane and utterly arbitrary disqualifiers for assistance **BEFORE** they force those in need to tell them their entire life story so those holding the purse strings here all have something to gossip about and laugh about when they ultimately reject almost EVERYONE who applies. The one shining star at RCP I would like to call out and shine a bright light on as someone truly magnanimous and helpful is Antoinette. May God bless that woman all the days of her life...And whatever RCP is paying her? It's not enough - that much I guarantee you.

But moving on: despite my qualifying for Rental Assistance due to being the victim of domestic violence AND being adversely impacted by COVID19 - Cunningham Township refused to help me, as well. BOTH require a one year signed lease. There are so many reasons WHY I cannot currently do that IN MY NAME as I am still actively being hunted by my abuser and need to be able to flee at a moment's notice if found - to name just one hardship. Re-imagine WHO gets Rental Assistance, for how long and why and consider being FAR MORE INCLUSIVE and thinking outside the box than you currently do. And realize that those who work at RCP and Cunningham Township are absolutely breaking the law when they demand to know the physical address of a victim of domestic violence who is a participant in the Address Confidentiality Program with the IL Attorney General's Office for victims of crime and violence as I am. I understand that rental assistance is, by nature, hyper-local and one must prove that they actually live here to receive benefits. But you must LEGALLY make a carve-out for those in Programs protecting this information otherwise Champaign Agencies are in ongoing breach of several applicable antidiscrimination laws in IL. Consider a Day of Training for these workers to become INFORMED on this Program, others like it and on the topic of domestic violence and the need for privacy and confidentiality AT ALL TIMES in the aftermath of said abuse.

CHAMPAIGN COUNTY HOUSING AUTHORITY:

Champaign Housing Authority allegedly sent me their Application for affordable housing here in Champaign. The ONLY thing I received from them was a letter telling me I did not return their application for housing within the ten (10) day window to do so; and, as such, I was considered disqualified. That's okay because prior to mailing me anything at all they also told me "the wait for affordable handicapped accessible housing in Champaign County is 5-7 years long." I literally do not have that kind of time to wait with my devastating Huntington's Diagnosis. I will, statistically, be dead far before my name would have ever been called on their Housing List anyway if I am on the streets to languish and die. If this is genuinely true of affordable housing here in Champaign, stop building more student housing and start building more affordable and handicapped accessible housing IMMEDIATELY. Again, though, I suspect this is your priorities and your biases at work as to who you have already decided you want to invest in here in Champaign and who you do not. Prove me wrong - I beg of you.

I don't think you THE HOUSED can ever seriously appreciate just how

UTTERLY TRAUMATIC the reality of being unhoused is. How could you know - for you likely have never even come CLOSE to experiencing it yourselves personally. But confronting this issue in any meaningful and measurable way will not happen if you do not decide that this is a moral imperative upon which you MUST act and act quickly to attenuate the suffering of so many. "Justice will not be served until those who are unaffected are as outraged as those who are."

Benjamin Franklin

I have so far told you which Agencies are utterly failing at their mission in homeless services and outreach and what is missing or lacking here in Champaign. But I would like to ALSO highlight those doing it right. And I do hope you will consider giving money/resources to these Agencies for they were truly the only ones who helped me:

Daily Bread: Their daily hot meals likely kept me alive this Winter. I don't know if you have ever experienced "shock hunger" but I have and it is a terrible thing to endure. The fact that these folks feed anyone who shows up at Noon or thereabout each day, a hot, nourishing meal - with no questions asked is an amazing act of true Christ-like service in this Community. I applaud them with a standing ovation and implore you to give them money to keep this life-saving resource going in Champaign. The fact that they send you off with a sandwich for dinner also means I do not go to bed starving as I used to do before finding them. I beg of you - please honor them, applaud them with me and give them more resources to help more people.

PACE: PACE is an amazing resource here for the disabled. They step up to help those the system is just content to "let fall through the cracks due to their complex housing needs caused by disability" when all other area Agencies abandon us completely. Many workers at PACE are also disabled and volunteer their time to help those disabled in the Community struggling to find housing and resources. Here again: you have people doing FOR FREE what those who are paid grossly inflated salaries are paid to do but simply fail at doing it. And PACE does a far better job at this critical intervention and assistance. Reward PACE for knocking it out of the park and stepping up where almost every other Agency charged with helping us utterly fails us.

Vineyard Food Pantry: I realize giving government money to churches may have some built-in roadblocks but I honestly go here more for the prayers they give than the food. Their eggs, butter and

meat have become “processed liquid egg in a carton and no butter or meat” of late. I worry that this is due to the crushing need on the system EVERYWHERE right now because so many Americans are struggling with food insecurity - both housed and unhoused. But their prayers at Vineyard are impactful and meaningful to me. And prior to just the past 2 months, they were giving out a generous quantity and quality of food that helped supplement my grocery budget. Reward them if nothing else for a job so well done. Those angels among us at Vineyard stand out in the heat, the rain and the freezing cold every Wednesday to get food to those in need in our Community. They are among the unsung heroes doing it for free that deserve recognition and accolades.

Empty Tomb (local nonprofit truly doing God’s work): Again when the actual Agencies charged with giving out Rental Assistance failed me, Empty Tomb paid my rent for me for April of this year. It took a Christian, faith-based organization to do what RCP and Cunningham Township REFUSED to do. Give RCP zero dollars for homelessness prevention and give whatever they <would receive> to Empty Tomb. Those who reap nothing, should sow nothing. And those who labor to help the poor, the outcast, the unloved and orphaned should be rewarded. Currently, Empty Tomb relies on “weekly private donors” to hand out Rental Assistance to caseworkers helping those experiencing housing insecurity. **HELP THEM HELP US.** The more money they have, the more money is allocated immediately by them to area landlords who otherwise would be contemplating eviction of a tenant struggling financially in this ongoing pandemic. Empty Tomb does not ask for your entire life story, your bank account information, your SSI/SSD, your “gossip worthy” salient tragic life details in order to consider giving your rental assistance. They do so within days, without cumbersome applications and required documentation and they send it out with their blessings to you and your life. **DO MORE OF THIS in CHAMPAIGN!!!** My God - you likely have NO IDEA how amazing they truly are. When RCP le me in my car to die in April, Empty Tomb stepped up. Call and talk with “Debbie” at Empty Tomb if you are unfamiliar with their work here in the Community.

They truly live, give and work as Jesus asked us to do...

I have admittedly never met any of you so I cannot presume to hypothesize on what motivates you to do the right thing or the wrong thing on critical social issues such as assisting our unhoused neighbors, victims of domestic violence and addressing the dire affordable housing crisis here. Champaign is but a microcosm of the Country at large. These problems are not UNIQUE to Champaign. But how you choose to address these problems IS entirely on you. Are you the type of town who is, as my initial impression has thus far been anyway, internally HOSTILE to your unhoused neighbors? Or are you willing to embrace radical new ideas in this regard and truly be the LEADER in innovative action on this dire social catastrophe in the making? The choice is yours. But if it were up to me? I would vote to be legendary, memorable, brave and bold in my approach to this escalating social crisis here in Champaign. I would seek to be the town that other towns look to for “Well how did they do it so well and so effectively?” And I would seek to be the town that gains National recognition for doing the unthinkable, the radical and the humane in an otherwise inhumane broken system.

I anticipate this communication will go largely ignored by those it was sent to but I’m always eager to be proven wrong on this prescient prognostication. Some of you might tell someone ELSE in social services to “reach out to me” on your behalf. Several will pretend they never received it. And to those people I say: I see you - that’s just another form of looking away and of white-washing a community so the NIMBY housed folks need not suffer the indignity of having to confront their unhoused neighbors



anywhere near them in their own homes. Techniques of avoidance is what it is actually called in criminology. Just like hiding the poor in unsafe shelters and dangerous jails - out of sight is out of your mind and off your plate, am I right? I have a knack for pointing out the ugly truths people in positions of power & responsibility would rather never confront. Please note, I do NOT need a "welfare check" being disabled with Huntingtong's in this heat in my car. Yes - I am medically vulnerable and could die in these conditions. But over the past three (3) years, I have learned radical resilience precisely because of failures by Agencies like those holding the purse-strings here in Champaign. Don't you worry about me. I did not come this far to only come this far. And I was fortunate to find a local woman willing to provide me short-term shelter until the end of August 2022. But as I will have no ability to pay her rent a er that point, I do not stay where I cannot pay my own way, contribute and leave a place better than how I found it. So who knows what tomorrow brings for me given the catastrophic simultaneous failure of so many Agencies here in Champaign?

I will be utterly unaffected if literally no one included in this communication contacts me to further discuss my ideas herein - and trust me - I have many more ideas of HOW TO EFFECTIVELY HELP on this topic but assumed you likely stopped reading a er the first page anyway. Your anticipated apathy and indifference is entirely unexpected at this point. I am accustomed to being ignored on the very topics on which I have the most to contribute to any given town in IL. But because I have been systemically failed and largely ignored, I have a book publishing on August 31, 2022 which tells the story of my entire Pandemic journey through first-time homelessness to a lethal IL Medicaid nursing home that nearly killed me, through a corrupt, criminal and crazy landlady who stole from her penniless tenant as she herself lives in stolen affluence in a tudor mansion. So, whether or not my story impacts you, is largely immaterial FOR ME. I am pleading with you to act on this urgent matter with your conscience and your hearts and your minds to SAVE THE OTHERS still languishing in this bewilderingly broken homeless system. It is for them that I wrote this letter to you sitting in the sweltering heat of my car AMONG THEM. For I have made friends along the way, have started an Urban Street Ministry called "Jesus In Disguise Ministry" and if they must suffer in this brutal heat - I will suffer with them in order to draw attention to this unspeakable moral failing of those charged with helping. I actually go to where they are every day to check on them, listen to them, help them spiritually and give them advice on any particular challenges they are facing of which I may have knowledge. WHERE ARE YOU, Champaign? Are you assuming RCP and Courage Connection are largely effectively handling this matter ON YOUR BEHALF? Because I am here to testify that they are not.

But see this is where I differ from many frustrated with this system: I always give the people in positions of power who have the ability to effectuate change the opportunity to do the right thing once they are made aware of just how catastrophically badly local Agencies are failing the most vulnerable in your Community. Because for all I know - you are fully unaware and this letter is your FIRST indication that something is very wrong and amiss in terms of help getting to those who need help here in Champaign. I never infer malice and ill-will when being simply unaware is a very likely possibility given how busy you, our leaders, are. But something my friend Glenn always says, who also works the homelessness prevention cause in New York, taught me: The people closest to the problem are closest to the solution but furthest from the power and

resources. Therefore, I plead with you to properly allocate these incoming monetary resources for homelessness outreach and prevention to BETTER stewards of such large sums of money, to more honest advocates of the marginalized who will tell you what is needed where it is most critically needed

and why in a way that might matter to your voters. I write to you on behalf of the oh so tired unsung heroes doing this work every day, unpaid, and constantly praying help comes in time to save our vulnerable neighbors in the unhoused community of Champaign.

Please note that if I did not think so much of this town and the people and Community here, I would not have bothered to beseech you to listen to someone with informed knowledge on these topics. C-U has SO MUCH TO OFFER: your vibrant arts community, your restaurants, your University life, your libraries, your local events, your Farmers Market, your local churches etc. I came here six (6) months ago and literally fell in love with this dazzling and dynamic town - in spite of my own personal hardships and challenges. I would hope that you receive this communication in the way that it is intended: as a sort of Love Letter to the City of Champaign (and Urbana) and NOT as a damning critique of all that is wrong here. If I honestly thought there was no hope for the people in positions of power here to just maybe HEAR ME on this matter, I would have honestly not undertaken this quite time-consuming effort to reach out to you at all. But when I watch your council meetings broadcast on local TV, I see how you actively listen to those who come to speak publicly about issues concerning them - even when you might not agree with what they have to say. There I see a respectful forum engaging their constituents in a thoughtful manner and THAT matters to me. That tells me something about WHO YOU ARE. I sadly cannot attend your public meetings and speak on behalf of the voiceless, our unhoused neighbors, because I went inexplicably 90% deaf following my nearly fatal case of COVID19. I can hear perfectly on the phone with my audio enhancer; but in person interactions with masks on everyone and at far distances from each other leaves me floundering to understand ALL of what is being said by others. But please, despite what might seem like some harsh observations by me herein, please accept this communication in the spirit in which it was written to you - in love and in peace wit hope for a brighter tomorrow here in Champaign IL.

I thank you for your time and attention in reading this communication, if you did, and ask that you contact me should you have any questions or comments.

Sincerely, Deb W.

Servant: Jesus in Disguise Ministry

314-686-1187

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**DATE:** Monday, July 18, 2022  
**TIME:** 7 p.m.  
**PLACE:** 400 S. Vine Street, Urbana, IL 61801

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The City Council of the City of Urbana, Illinois, met in public hearing Monday, July 18, 2022, at 7 p.m.

**ELECTED OFFICIALS PHYSICALLY PRESENT:** Diane Wolfe Marlin, Mayor; Phyllis Clark, City Clerk; CM Maryalice Wu, CM Christopher Evans, CM Shirese Hursey, CM Chaundra Bishop, CM Jaya Kolisetty

**ELECTED OFFICIALS ABSENT:** CM Grace Wilken, CM James Quisenberry

**STAFF PRESENT:** Bourema Ouedraogo, Darcy Sandefur, Carol Mitten, Sheila Dodd, Brearden Belcher, Elizabeth Hannan

**OTHERS PRESENT:** J.D. McLanahan, Champaign County Regional Plan Commission;

## 1. Call to Order and Roll Call

With a quorum present, Chair Mayor Marlin called the public hearing of the Urbana City Council to order at 7 p.m.

The purpose of this public hearing is to provide an opportunity for the public to provide input and comments regarding the proposed City of Urbana and Urbana HOME Consortium Annual Action Plan Amendment for Fiscal Year 2020-21. This amendment includes the HOME American Rescue Plan Allocation plan.

Notice of this public hearing was faxed and/or emailed to the media, emailed to various social service agencies and citizens, and/or placed on the City of Urbana's website on June 30, 2022 and the July 5, 2022 edition of the News Gazette.

This allocation plan identifies preferences to serve homeless or near homeless individuals as well as presents the proposed budget of \$2,970,773. Eligible activities are Supportive Services, Acquisition and Development of Affordable Rental Housing, Non-Profit Operating, Non-Profit Capacity Building, and Administration and Planning.

Sheila Dodd the Interim Community Development Director and J.D. McLanahan from the Champaign County Regional Plan Commission presented a PowerPoint presentation on the HOME ARP Allocation Plan and the progress to date. Reviewed public input gathered previously and shared the proposed allocation allotments. The complete PowerPoint Presentation [can be found here](#).

## 2. Public Input

None

### **3. Adjournment**

With no further business before the Urbana City Council Chair Marlin adjourned the public hearing at 7:12 p.m.

Darcy Sandefur

Recording Secretary

This meeting was video recorded and is viewable [on-demand HERE](#).

**Minutes approved:**



*UNAPPROVED*

**MINUTES**

**COMMUNITY DEVELOPMENT COMMISSION PUBLIC HEARING**

**Tuesday, July 26, 2022, City Council Chambers**

**400 South Vine Street, Urbana, IL 61801**

**Call to Order:** Chair Chris Diana called the public hearing of the Urbana Community Development Commission to order at 6:00 p.m.

**Roll Call:** Brearden Belcher, Community Development Specialist, called the roll. A quorum was present.

**Commission Members Present:** Chris Diana, Patricia Jones, Shawn Green

**Commission Members Excused/Absent:** Anne Heinze Silvis, Rev. Robert Freeman

**Others Present:** Sheila Dodd, Grants Management Division Manager; Brearden Belcher, Community Development Specialist; Hillary Ortiz, Office Specialist, JD McClanahan, Planner II, Champaign County Regional Planning Commission

**Public Input:** Chairman Diana stated that purpose of this public hearing is to provide an opportunity for the public to provide input and comments regarding the proposed City of Urbana and Urbana HOME Consortium Annual Action Plan Amendment for Fiscal Year 2021. This amendment includes the HOME American Rescue Plan Allocation plan.

Notice of this public hearing was faxed and/or emailed to the media, emailed to various social service agencies and citizens, and/or placed on the City of Urbana's website on June 30, 2022 and the July 5, 2022 edition of the News Gazette.

This allocation plan identifies preferences to serve homeless or near homeless individuals as well as presents the proposed budget of \$2,970,773. Eligible activities are Supportive Services, Acquisition and Development of Affordable Rental Housing, Non-Profit Operating, Non-Profit Capacity Building, and Administration and Planning.

Sheila Dodd the Interim Community Development Director and J.D. McLanahan from the Champaign County Regional Plan Commission presented a PowerPoint presentation on the HOME ARP Allocation Plan and the progress to date. Reviewed public input gathered previously and shared the proposed allocation allotments.

Chairman Diana stated that audience members could provide input on the 2021 HOME ARP Allocation Plan if they so wished. No one from the audience stepped forward to speak

**Adjournment:** Seeing no further business, Chairman Diana adjourned the meeting at 6:03 p.m.

Recorded by

Breaden J. Belcher  
Community Development Specialist

**RESOLUTION NO. 2022-08-059R**

**A RESOLUTION APPROVING AN AMENDMENT TO THE CITY OF URBANA  
AND CHAMPAIGN/URBANA/CHAMPAIGN COUNTY HOME CONSORTIUM**

**FY 2021 ANNUAL ACTION PLAN TO INCLUDE HOME ARP ALLOCATION**

**WHEREAS**, the City of Urbana ("City") is a home rule unit of local government pursuant to Article VII, Section 6, of the Illinois Constitution, 1970, and may exercise any power and perform any function pertaining to its government and affairs, and the passage of this Resolution constitutes an exercise of the City's home rule powers and functions as granted in the Illinois Constitution, 1970; and

**WHEREAS**, the City of Urbana has been designated lead entity for the Urbana HOME Consortium in accordance with the Cranston-Gonzalez National Affordable Housing Act of 1990, as amended, and as such is eligible to receive HOME Investment Partnerships (hereinafter "HOME") funds on behalf of the City of Urbana, City of Champaign, and Champaign County; and

**WHEREAS**, on September 13, 2021, HUD published a final rule in the Federal Register outlining the requirements for the use of funds in the HOME - American Rescue Plan program; and

**WHEREAS**, the Urbana City Council approved the *City of Urbana and Urbana HOME Consortium (Champaign/Urbana/Champaign County) FY 2021 Annual Action Plan* on April 26, 2021; and

**WHEREAS**, the Urbana Community Development Commission, assisted by Urbana Community Development Services staff, has prepared the *City of Urbana and Urbana HOME Consortium Annual Action Plan Amendment FY 2021* (hereinafter the "Allocation Plan"); and

**WHEREAS**, on June 30, 2022, a notice was published on the City of Urbana website describing the HOME ARP Allocation Plan, requesting public input, and announcing public



hearings which were held on July 18, 2022 and July 26, 2022 regarding the Annual Action Plan amendment; and

**WHEREAS**, on June 30, 2022, a notice was published on the City of Urbana social media and website describing the Annual Action Plan amendment; announcing a public review period beginning June 30, 2022 and ending July 29, 2022 during which members of the public are able to view a Draft Allocation Plan and provide input; and

**WHEREAS**, the Urbana City Council held a public hearing on the Allocation Plan on July 18, 2022; and

**WHEREAS**, the Community Development Commission held a public hearing on the Allocation Plan on July 26, 2022; and

**NOW, THEREFORE, BE IT RESOLVED** by the City Council of the City of Urbana, Illinois, as follows:

Section 1. That the *City of Urbana and Urbana HOME Consortium Annual Action Plan Amendment FY 2021*, in substantially the form as attached hereto and incorporated herein by reference, is hereby approved.

Section 2. That the Mayor is hereby designated as the authorized representative of the City of Urbana to take any action necessary in connection with said Allocation Plan to implement the HOME ARP programs and to provide such additional information as may be required.

Section 3. That upon review and comment by the Urbana Community Development Commission and Urbana City Council, the Mayor is hereby designated to execute subgrantee agreements for programs and activities identified in said Allocation Plan.

Section 4. That subgrantee agreements for programs and activities identified in said Allocation Plan shall be subject to review and approval by the Urbana City Council before execution by the Mayor.




**PASSED** by the City Council this 1st day of August, 2022.

AYES: Wu, Evans, Hursey, Kolisetty, Bishop, Wilken, Quisenberry

NAYS: None

ABSTAINS: None

  
Phyllis D. Clark  
Phyllis D. Clark, City Clerk

**APPROVED** by the Mayor this 2nd day of August, 2022.

Diane Wolfe Marlin  
Diane Wolfe Marlin, Mayor



DEPARTMENT OF COMMUNITY DEVELOPMENT SERVICES

Planning Division  
400 S. Vine Street  
Urbana, IL 61801  
(217) 384-2440

June 26, 2022

News-Gazette Media  
Classified Section  
Legal Publications  
15 East Main Street  
Champaign, IL 61820  
Phone 351-5252  
FAX 351-5291

Dear News-Gazette Legal Publications:

Please publish the attached legal notice once for the edition on **Sunday, July 3, 2022**. Please send the invoice or bill for the publication fee and certificates of publication as follows:

Invoice or bill and Certificate of Publication to:

**Account No. 99226335**  
**City of Urbana**  
**ATTN: City Clerk**  
**400 S. Vine Street**  
**Urbana, IL 61801**  
**217-384-2366**  
**CityClerk@urbanailinois.us**

One certificate of publication to the following individual:

Sheila Dodd  
Community Development Services  
400 S. Vine Street  
Urbana, IL 61801

If you have any questions, please contact me at [sedodd@urbanailinois.us](mailto:sedodd@urbanailinois.us) or (217) 384-2441.

Sincerely,

Sheila Dodd  
Interim Community Development Services Dept.

**NOTICE OF PUBLIC HEARING REGARDING THE URBANA HOME CONSORTIUM  
AMERICAN RESCUE PLAN (ARP) ALLOCATION PLAN**

**NOTICE IS HEREBY GIVEN** TO ALL INTERESTED AGENCIES, GROUPS AND PERSONS; The Urbana HOME Consortium proposes to submit a HOME-ARP allocation plan to the U.S. Department of Housing and Urban Development (HUD) on or about July 26, 2022. The HOME-ARP allocation plan describes the distribution of HOME-ARP funds in the amount of \$2,970,773 which will assist individuals or households who are homeless, at risk of homelessness, and other vulnerable populations, by providing permanent housing, supportive services, rental assistance, and non-congregate shelter, to reduce homelessness and increase housing stability within Champaign County. The plan also identifies any preferences being established for eligible activities or projects. It is available for public examination on the City's web site, [urbanaillinois.us](http://urbanaillinois.us), and at the Urbana Free Library, Champaign Public Library, City of Urbana Community Development Department; and City of Urbana Clerk's office. The Urbana HOME Consortium has determined that a Public Hearing should be held on **July 5, 2022, at 7:00 p.m.** in the Urbana City Council Chambers, at 400 S Vine St., Urbana, IL for the purpose of obtaining citizen views regarding the HOME-ARP allocation plan. All persons wishing to comment on the HOME-ARP allocation plan may state their views at this hearing or submit written comments, which will be attached as an addendum to the HOME-ARP allocation plan for consideration by HUD. Such written comments should be received before 12:00 p.m. on July 20, 2022 at the Office of the City Clerk, mailing and physical address: 400 S Vine St., Urbana, IL or email [grants@urbanaillinois.us](mailto:grants@urbanaillinois.us).

Please contact Sheila Dodd at 217-384-2441 if special accommodations are needed.

## 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:**

09/28/2022

**4. Applicant Identifier:**

**5a. Federal Entity Identifier:**

**5b. Federal Award Identifier:**

**State Use Only:**

**6. Date Received by State:**

**7. State Application Identifier:**

**8. APPLICANT INFORMATION:**

**\* a. Legal Name:**

City of Urbana

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

37-6000524

**\* c. UEI:**

S9V6SD6918H7

**d. Address:**

**\* Street1:**

400 S Vine St

**Street2:**

**\* City:**

Urbana

**County/Parish:**

Champaign

**\* State:**

IL: Illinois

**Province:**

**\* Country:**

USA: UNITED STATES

**\* Zip / Postal Code:**

618013336

**e. Organizational Unit:**

**Department Name:**

Community Development Services

**Division Name:**

Grants Management Division

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

**Prefix:**

Ms.

**\* First Name:**

Sheila

**Middle Name:**

**\* Last Name:**

Dodd

**Suffix:**

**Title:** Interim Community Development Services Direct

**Organizational Affiliation:**

City of Urbana, IL

**\* Telephone Number:**

217-384-2441

**Fax Number:**

**\* Email:** sedodd@urbanailinois.us

## 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 Partnerships Program

### \* 12. Funding Opportunity Number:

M-21-DP-17-0217

\* Title:

Grant number

### 13. Competition Identification Number:

N/A - Entitlement

Title:

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

Add Attachment

Delete Attachment

View Attachment

### \* 15. Descriptive Title of Applicant's Project:

City of Urbana and Urbana HOME Consortium Home-ARP program. Will include funding for supportive services, non-congregate shelter, affordable housing, capacity building, operating, and admin.

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 \* 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: \* b. End Date: **18. Estimated Funding (\$):**

* a. Federal	<input type="text" value="2,970,773.00"/>
* b. Applicant	<input type="text"/>
* c. State	<input type="text"/>
* d. Local	<input type="text"/>
* e. Other	<input type="text"/>
* f. Program Income	<input type="text"/>
* g. TOTAL	<input type="text" value="2,970,773.00"/>

**\* 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:	<input type="text" value="Ms."/>	* First Name:	<input type="text" value="Diane"/>
Middle Name:	<input type="text" value="Wolfe"/>		
* Last Name:	<input type="text" value="Marlin"/>		
Suffix:	<input type="text"/>		

\* Title: \* Telephone Number:  Fax Number: \* Email: 

\* Signature of Authorized Representative:

\* Date Signed:

## 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.


**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:

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).
9. 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 non-discrimination. 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.

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.
12. 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).
16. 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.
17. 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.).
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."
19. 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.

<b>SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL</b> 	<b>TITLE</b> <div data-bbox="898 1344 1510 1381">Mayor, City of Urbana</div>
<b>APPLICANT ORGANIZATION</b> <div data-bbox="95 1486 868 1516">City of Urbana, IL</div>	<b>DATE SUBMITTED</b> <div data-bbox="898 1486 1510 1516">09/28/2022</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.


**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:

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).
9. 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 non-discrimination. 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.

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.
12. 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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19. 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.

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## 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.

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Signature of Authorized Official

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09/28/2022

Date

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Title