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Bruce Rauner, Governor

June 30, 2016

Mr. Ray Willis, Director Community Planning and Development U.S. Department of Housing and Urban Development Ralph H. Metcalfe Federal Building 77 West Jackson Boulevard, 24th Floor Chicago, Illinois 60604-3507

ATTN: Mr. Jerry Deese

Community Planning and Development Representative

RE:

Submission of the State's FY 2016 Action Plan

Dear Mr. Willis:

This letter hereby transmits to you the State of Illinois' Consolidated Plan - 2016 Action Plan.

Please feel free to contact Burton Hughes of our Office of Housing Coordination Services, at 312/836-5320, if you or your staff have any questions or concerns during your review of this document. Thank you and your staff's ongoing assistance.

Sincerely:

Audra Hamernik
Executive Director

Executive Summary

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

1. Introduction

The U.S. Department of Housing and Urban Development (HUD) requires State and local grantees of the four formula grant programs, namely the Community Development Block Grant (CDBG) the HOME Program, the Emergency Solutions Grants (ESG), and the Housing Opportunities for Persons with AIDS (HOPWA) programs to develop a five-year Consolidated Plan as a condition for funding. The State of Illinois' Consolidated Plan covers those non-entitlement areas of the State that do not have a local Consolidated Plan. Governor Edgar, on June 16, 1994, designated the Illinois Housing Development Authority (IHDA) as the lead agency in developing the Consolidated Plan. Governor Bruce Rauner, on May 6, 2016 further designated the Illinois Housing Development Authority as the HOME Program Participating Jurisdiction, taking the place of the State as the participating jurisdiction for the State HOME Program.

IHDA's Office of Housing Coordination Services (OHCS) has primary responsibility for coordinating, developing and distributing the Plan, and receives input from the OHCS advisory Committee and the general public in developing and updating the Plan.

Executive Order 2003-18 also established the State of Illinois' Comprehensive Housing Initiative on September 16, 2003, and created the Housing Task Force to improve the planning and coordination of the State's housing resources through 2008. While many of these areas have in fact been historically addressed by the State Consolidated Plan, they were previously done so on a voluntary administrative basis rather than with legislative or executive (Governor's) mandate. The Executive Director of the Illinois Housing Development Authority (IHDA) was appointed Chair of the State's Housing Task Force and was joined by a panel of thirty-four representatives from State agencies and the housing community. Furthermore, the identification of the following six underserved populations in the Executive Order now provides more specificity to the State's housing priorities:

- Low-income Households (with particular emphasis on households earning below 30% of area median income);
- Low-income seniors;
- Low-income persons with disabilities:
- Homeless persons and persons at risk of homelessness;
- Low and moderate- income persons unable to afford housing near work or transportation (Live Near Work); and
- Low-income persons residing in existing affordable housing that is in danger of being lost or becoming unaffordable (Preservation).

The Comprehensive Housing Planning Act (P.A. 94-965) of 2006 codified Executive Order 2003-18 and extends its intent through June 30, 2016. Per the Act, the State of Illinois shall continue to prepare and be guided by an annual comprehensive housing plan addressing the housing needs of the underserved populations. Annual Comprehensive Housing Plans are to include an identification of funding sources for which the State has administrative control that are available for housing construction, rehabilitation, preservation, operating or rental subsidies, and supportive services.

Illinois Draft Allocation Plan for the National Housing Trust Fund

The Illinois Housing Development Authority (IHDA) has been designated by the Governor as the administering State agency for the newly-funded NHTF. Authorizing statute and HUD's interim rule place specific parameters on the eligible uses of these funds. Those requirements, along with IHDA's proposed uses, are included as an attachment to this State of Illinois 2016 Action Plan.

An amendment to the Five Year 2015-2019 Consolidated Plan, to include the Goals and Outcomes of the National Housing Trust Fund in the five-year Strategic Plan, is forthcoming.

2. Summarize the objectives and outcomes identified in the Plan

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

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

- Accessibility for the purpose of creating suitable living environments
- Accessibility for the purpose of creating economic opportunities
- Affordability for the purpose of providing decent affordable housing
- Affordability for the purpose of creating economic opportunities
- Sustainability for the purpose of creating suitable living environments
- Sustainability for the purpose of providing decent affordable housing

3. Evaluation of past performance

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

On May 29, 2015 HUD's Office of Community Planning and Development in Chicago issued its 2014 Program Year End Review Letter to the State of Illinois. The letter is on file with and available through IHDA's Office of Housing Coordination Services. Points of note:

Evaluation of Past Performance

- HUD determined the State was making acceptable progress towards its 5-Year goals.
- The State is meeting the 15-month goal to obligate 100 percent of its CDBG funds, and did not exceed the 2 percent cap on the CDBG funds for administrative and technical assistance costs.
- 2014 is the last year of the State's 2012, 2013, 2014 low/mod compliance period for its CDBG funds on projects and programs that would benefit low and moderate income people. Until the State enters final information into HUD IDIS PR-28 Report, compliance cannot be evaluated. A review of CDBG Activities contains 3 flags for the State's activities, with two pending at risk. HUD commends the State for taking all necessary actions to reduce the amount of flagged and at-risk activities since Program Year 2012, when the State had 138 flagged activities and 117 Pending-At-Risk Activities.
- HOME Investment Partnerships: During the 2014 program year, the State complied with the 24-month commitment deadline and the five-year expenditure deadline for HOME funds. The State reserved at least 15 percent of its allocation for designated Community Housing Development Organizations (CHDOs). In 2014, no HOME funds were subject to recapture. HUD expressed its continuing concern regarding the State's high commitment shortfall within four months of the commitment deadline, and is requesting a management plan from IHDA for entry of all commitments into the IDIS System.
- Regarding the Emergency Solution Grants, the State is in compliance with the expenditure deadline for 2014 ESG funds. Though the State did not meet the expenditure deadline for 2012, it appears on target to meet deadlines for 2013 and 2014 funding.
- The HOPWA program was assessed during the 2014 program year. The 2011 grant was assessed to determine the State's compliance with the three-year expenditure requirement. The State expended 100 percent of the 2011 grant.
- As of May 29, 2015, the State met both expenditure deadlines for NSP 1 and NSP 3 programs.
- As of May 29, 2015, the State had obligated \$17,301,785 out of the \$17,341,434 Mid-West Floods Grant in DRGR, with total disbursements of \$14,379,330.95. For the CDBG-IKE Grant, the State has obligated over 98% (or \$191,495,945.59) of the \$193,700,004 in grant funds, with total disbursements of \$151,985,101.83.
- The CDBG program was not monitored during the 2014 program year. However, one finding of non-compliance for 2013 regarding eligible use of Revolving Loan by Units of General Local Government remained unresolved. The State requested a one-year extension to allow the legislate bipartisan Joint Committee on Administrative Rules (JCAR) to approve the changes to State agency administrative rules by the Corrective Action issued by HUD. HUD granted this reasonable request. The State subsequently submitted its response and is receiving additional technical assistance to resolve this finding.

HUD has determined that the State of Illinois has the continuing capacity to administer Community Planning and Development programs, and the activities under CDBG, HOME, HOPWA and ESG were consistent with its Consolidated Plan. The State used the funds appropriately and as intended to address needs.

4. Summary of Citizen Participation Process and consultation process

Summary from citizen participation section of plan.

5. Summary of public comments

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

The Public Comment period began May 27, 2016 and ended June 27, 2016. The State held one public hearing on Wednesday, June 22, 2016 at 10:00 A.M. It was presented via tele-video conference at the following 3 locations: Illinois Housing Development Authority, 401 North Michigan Avenue-7th Floor, Chicago, Illinois: Department of Commerce and Economic Opportunity (DCEO)4th Floor Conference Room, 500 East Monroe, Springfield; and the Illinois State Regional Office Building-Conference Suite 106, 2309 West Main Street, Marion. No members of the public were available at the three locations to provide public comment. No public comments were received via email or phone call.

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

Not applicable. No public comments were received during the public comments period. In addition to the public hearings for the Consoliated Plan, OHCS schedules regular quarterly meetings of the OHCS Advisory Committee (AC) to update the public on formula grant activities and provide for discussion, comment, and feedback on various Consolidated Plan-related issues. One AC meeting in 2016 was held on June 22, 2016 in Springfield, the day prior to the three-way video-conference public hearing. Minutes of all regularly scheduled AC meetings are available upon request to the Office of Housing Coordination Services.

7. Summary

In addition to the public hearings, OHCS schedules regular quarterly meetings of the OHCS Advisory Committee (AC) to update the public on formula grant activities and provide for discussion, comment, and feedback on various Consolidated Plan-related issues. AC meetings in 2016 were held on March 22, May 3, and June 22, 2016. Additional meeting are scheduled for August 24, and November 2nd. Minutes of these regularly scheduled meetings are available upon request to the Office of Housing Coordination Services.

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

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

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

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

Table 1 - Responsible Agencies

Narrative

Lead Agency Designation

Governor Jim Edgar designated the Illinois Housing Development Authority (IHDA) as the lead entity for developing and producing the State Consolidated Plan and related documents (See Attachment).

The Comprehensive Housing Plan Act (P.A. 94-965) issued on June 30, 2006, established the State of Illinois' first-ever Comprehensive Housing Act. The Act calls for: the creation of a Housing Task Force; the development of a State comprehensive housing plan, with staff support and coordination assistance from IHDA; the identification of underserved populations; the encouragement to more effectively use available funds from IHDA and other State agencies in a single application process; annual progress reporting; and other features. While many of these areas have in fact been historically addressed by the State Consolidated Plan, they have been done so on a voluntary, administrative basis rather than with legislative or executive (Governor's) mandate. Furthermore, the identification of underserved populations in the Act now provides more specificity to the State's housing priorities.

Illinois is eligible to receive grants under all four major HUD formula funding programs. These formula grants are administered by the four different State agencies as included in the chart above.

Consolidated Plan Public Contact Information

Illinois Department of Commerce and Economic Opportunity (CDBG)

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Illinois Department of Public Health (HOPWA)

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

1. Introduction

The State consulted the following major advisory bodies:

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

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

Public housing authorities are represented on the OHCS Advisory Committee, the Housing Task Force, and the Affordable Housing (Trust Fund) Advisory Commission. The 2015 Illinois Governor's Conference on Affordable Housing included a session on the RAD Program, which brought PHAs together with private affordable housing developers who work using the Low Income Housing Tax Credit (LIHTC) Program.

Also, IHDA participates on the Board of the National Association of Housing and Redevelopment Officials (NAHRO) at the State, Regional, and National levels. This allows for planning and involvement in a variety of conference and training topics of mutual interest to PHAs, community development agencies, and the State. Examples of sessions at recent NAHRO conferences include the following: Affordable Housing Development 101 and Affirmatively Furthering Fair Housing.

IHDA also works closely with the Illinois Housing Council (IHC) an affordable housing membership organization. IHC co-sponsors the Governor's Conference on Affordable Housing with IHDA annually.

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

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

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

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

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

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

Continuum of Care agencies are represented on the State's Interagency Council on Homelessness (ICH). The State's ICH was formed as a result of an award of a grant through the Federal SAMHSA. However, an expanded scope, work plan and sustainability plan are currently being drafted.

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

Statewide Continua of Care (CoC) are asked to make recommendations to the Illinois Department of Human Services (IDHS) for funding to units of local government or private not-for-profit organizations within their jurisdictions. The Department reviews proposals for each of the organizations recommended for funding by the CoCs, and makes awards based on the merit of the proposal and past performance. The amount of the grant depends on the amount negotiated based on the application submitted, and the recommendation by the local CoC. Local Continua of Care designate the HMIS for their areas. All activities must comply with HUD's standards on participation, data collection, and reporting under a local HMIS.

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

Table 2 – Agencies, groups, organizations who participated

1	Agency/Group/Organization	ALLIANCE TO END HOMELESSNESS IN SUBURBAN COOK COUNTY
	Agency/Group/Organization Type	Regional organization
	What section of the Plan was addressed by Consultation?	Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Helped refine the Illinois Continua-wide request for information for the 2015 homeless needs assessment.
2	Agency/Group/Organization	Corporation for Supportive Housing
	Agency/Group/Organization Type	Housing Services - Housing Services-Persons with Disabilities
	What section of the Plan was addressed by Consultation?	Homeless Needs - Chronically homeless Homelessness Needs - Veterans
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	A member of the OHCS Advisory Committee. Helps communities create permanent supportive housing with services to prevent and end homelessness, provides capacity building, training; pre-development funding and advocacy services for supportive housing developers and projects
3	Agency/Group/Organization	NORTH WEST HOUSING PARTNERSHIP
	Agency/Group/Organization Type	Housing Regional organization
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs

	·	·
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The North West Housing Partnership acts as a catalyst to bring together the public and private resources necessary to help provide communities in the north and west suburbs of Chicago with affordable housing options.
4	Agency/Group/Organization	Development Services Group, Inc.
	Agency/Group/Organization Type	Services-Elderly Persons Business Leaders
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Development Services Group is a private consulting firm that has experience wiht business, financing, and economic/housing development programs.
5	Agency/Group/Organization	IFF (formerly Illinois Facilities Fund)
	Agency/Group/Organization Type	Housing Regional organization
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs Economic Development
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	A non-profit lending institution that focuses on human service agencies unable to obtain traditional financing for real estate projects. The IFF also undertakes special real estate development programs with government and non-profit organizations
6	Agency/Group/Organization	Illinois Manufactured Housing Association
	Agency/Group/Organization Type	Housing Business Leaders
	What section of the Plan was addressed by Consultation?	Market Analysis

	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the	Member of the OHCS Advisory Committee: IMHA serves as a trade organization for the manufactured housing industry, representing
	consultation or areas for improved coordination?	manufacturers, retailers, suppliers and rental community owners.
7	Agency/Group/Organization	Illinois Mental Health Planning and Advisory Council
	Agency/Group/Organization Type	Services-Children
		Services-Elderly Persons
		Services-Persons with Disabilities
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs
	Briefly describe how the Agency/Group/Organization was	
	consulted. What are the anticipated outcomes of the	
	consultation or areas for improved coordination?	
8	Agency/Group/Organization	RANTOUL
	Agency/Group/Organization Type	Housing
		Services-Children
		Services-Elderly Persons
		Services-Persons with Disabilities
		Services-Health
		Services-Education
		Service-Fair Housing
		Other government - Local
	What section of the Plan was addressed by Consultation?	Economic Development
	Briefly describe how the Agency/Group/Organization was	A CDBG local Entitlement Community and member of the OHCS Advisory
	consulted. What are the anticipated outcomes of the	Committee, represented by the Village of Rantoul Community Development
	consultation or areas for improved coordination?	Director

9	Agency/Group/Organization	WABASH AREA DEVELOPMENT, INC.
	Agency/Group/Organization Type	Housing
		Services-Children
		Services-Elderly Persons
	What section of the Plan was addressed by Consultation?	Anti-poverty Strategy
	Briefly describe how the Agency/Group/Organization was	WADI is a community action agency and a member of the OHCS Advisory
	consulted. What are the anticipated outcomes of the	Committee.
	consultation or areas for improved coordination?	

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

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

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

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

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

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
		IHDA promotes fair housing in the marketing of all its financed units under the Illinois
		Affordable Housing Trust Fund, the LIHTC, and HOME Programs, which require affirmative
		marketing plans as part of their application processes. IHDA recognizes the importance of
		non-discriminatory practices with regard to residential property and related facilities. IHDA's
		goal is to promoted a condition in which all individuals in the same housing market area have
		available a like range of housing choices. Thus, IHDA requires all multifamily projects with 5
		or more HOME for Trust Fund assisted units comply with IHDA's affirmative fair housing
		policies and procedures. IHDA also evaluates proposals involving single-family projects with
		five or more HOME assisted units to determining the appropriateness of affirmative
		marketing efforts. The Affordable Housing Trust Fund Program requires that projects with 5
		or more unites financed in whole or in part for family housing must have at least 20% of the
		units to be at least adaptable for future accessibility improvements. Projects involving HOME
		or the Risk Sharing Program funding must at minimum comply with the 5% minimum
		accessibility requirements of Section 504 of the Rehabilitation Act of 1973. Per the Qualified
AFFH (2)	IHDA (with IDHR)	Allocation Plan for LIHTCs, projects must comply with all applicable federal and State
71111(2)	in bit (with bint)	accessibility laws to receive credits. Additional project scoring points are provided for
		developments that provide enhanced accessibility standards. For single-family programs,
		such as the Illinois Homebuyer Program and the Mortgage Credit Certificate Program, fair
		housing provisions are discussed at IHDA-hosted local training sessions and included in each
		lender's procedures manual, which is signed off by each participating lender's chief
		executive. Lenders located in urban areas of of the State also must comply with the
		provisions of the Home Mortgage Disclosure Act and the Community Reinvestment Act,
		which includes monitoring by federal bank examiners for their particular category of lending
		institution (Office of Thrift Supervision, Federal Reserve Bank, or Office of the Comptroller of
		the Currency). Under Illinois' Rental Housing Support Program, all Local Administrating
		Agencies and participating landlords must follow all rules governing Fair Housing and all
		other applicable state and federal laws, and make efforts to publicize units under the RHSP,
		contacting non-profit corporations in the areas a LAA covers. IHDA provides a preference to
		LAA applicants which target up to 30% of their requested assistance to "Special Needs
		Tenant". Annual Action Plan 16

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
		DCEO administers two of the four State formula grants included in the State Consolidated
		Plan. DCEO requires fair housing activities (to be undertaken) to be identified in each
		applicant local governments' application. In addition, DCEO also requires grantees to comply
		with applicable civil rights laws when applying for and receiving grant funds. The compliance
		review includes an EEO/Fair Housing review of each grantee. The agency reviews action
		taken to affirmatively further fair housing and compliance with Section 504 of the
AFFH (3)	DCEO (with IDHR)	Rehabilitation Act of 1973. DCEO requires an explanation of local efforts at the time of
		application and a description of how the project will affirmatively further fair housing. DCEO
		will monitor the grantee's local actions to determine if existing action is sufficient in the
		following:* Provides Fair Housing Posters to grantees on an as needed basis.* Encourages
		grantees to adopt a fair housing ordinance. Finally, DCEO also funds accessibility
		improvements on privately-owned housing. This is accomplished through housing
		rehabilitation grantees under the CDAP Housing Rehabilitation Grants component.
		The Illinois Department of Financial and Professional Regulations (IDFPR) has two divisions
		that are involved in fair housing activities: Division of Banking and the Division of
		Professional Regulations.1. The Division of Banking is responsible for regulating commercial
		banks and residential mortgage bankers, brokers and loan originators. Regarding fair lending,
		most attention has focused on federal regulatory actions to better insure non-discrimination
		and community reinvestment.2. The Division of Professional Regulation licenses Real Estate
	Dept of Financial and	Professionals, including real estate brokers, salespersons, and appraisers. The Division works
AFFH (4)	Professional Regulations	with the other divisions to investigate claims of discriminatory real estate practices. Also the
	(with IDHR)	Divisions's computer system audits every real estate licensee's continuing education course
		work to ensure compliance with the continuing education requirements.IDFPR, in
		conjunction with IHDA, spearheads the Mortgage Relief Project (MRP), which is part of the
		Illinois foreclosure Prevention Network established by the Governor to help Illinois
		homeowners take advantage of programs to help them lower their mortgage, avoid
		foreclosure and keep their homes. Since the inception of the MRP, IDFPR, with IHDA, has
		assisted nearly 30,000 Illinois homeowners receive help for troubled mortgages.

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
AFFH (5)	Illinois Department of Insurance (with IDHR)	The Illinois Department of Insurance conducts both regulatory and consumer protection activities. In keeping with an open competition regulatory philosophy, tts emphasis in the fair housing areas is on education and actual complaint resolution rather than on testing and investigation of regulatory reform of industry practices based on anecdotal evidence. In the complaint process, Departmental analysts access written complaints, documentation, and responses from the company or agent mentioned in the complaint. An analyst reviews the company's/producers actions for compliance with Illinois insurance laws and takes appropriated action if laws have been violated. All housing-related complaints are tallied and included in each company's "complaint ratio" (number of complaints per million dollars of premium)" which is made public. The Department also monitors complaint substance by company; if a complaint pattern emerged, Department officials may meet informally with the company to discuss the problem. The Department also has the authority to initiate special market conduct exams in which the company's practices are reviewed. The Department's Consumer Outreach personnel speak to various citizen groups and on radio call-in programs. The Department also provided consumer information on its website. It also takes part in the National Insurance Task force, which encouraged partnerships between insurance groups and community organizations.
AFFH (6)	Illinois Council on Developmental Disabilities (with IDHR)	The Illinois Council on Developmental Disabilities works to build the capabilities of individuals, families and communities, enabling each to become more self-sufficient through the Development Disabilities Assistance and Bill of Rights Act (federal law - "the DD Act"). ICDD programs are developed in direct response to the concerns and ideas voiced by consumers, families, service providers, policy makers and other professionals. the mission of the Council is to help lead change in Illinois so all people with developmental disabilities exercise their right to equal opportunity and freedom. ICDD strives to ensure the fair housing issues or barriers are resolved and people with disabilities have choice on housing options through its advocacy efforts and grant investments. The Council advocates individualized supports as a necessary means of allowing people to choose where and how they live in the community.

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

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Homeless Prevention: Discharge Coordination Policy	Various State Agencies	Individual and inter-agency efforts on discharge policies are underway at many agencies, and continue in conjunction with the February 9, 2006 enactment of 24 CFR part 91.325, as reflects the requirement for all McKinney-Vento Homeless Assistance Act grantees. A certification that the state has established a policy for the discharge of persons from publicly funded institutions or systems of care (such as health care facilities, foster care, or other youth facilities, or correction programs and institutions) in order to prevent such discharge from immediately resulting in homelessness for such persons.

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
		Under the ESG Program, the State received responses from 21 separate homeless
		services/shelter agencies which had submitted copies of such polices, or were developing
		coordinated discharge polices along with other agencies participating in their local
		Continuum of Care systems. A sampling of cities/areas represented (all outside of Cook
		County) is as follows: Springfield, Rockford, Peoria, Champaign, Quincy, Carbondale,
		McHenry County, Kane County, Freeport, Harrisburg, Metropolis, Danville, Olney, Highland,
		Princeton, Greenup, and Anna. The Illinois Department of Public Health (IDPH) operates
		under some eight separate State administrative rules that govern different types of hospitals,
		nursing homes, and assisted living facilities that it licenses or otherwise regulates. These
		regulations cover the following; hospitals; assisted living facilities; skilled nursing and
		intermediate; sheltered care; veterans homes; intermediate care for developmentally
		disabled; community living facilities; and skilled nursing for under age 22. All eight
		administrative rules include discharge policies. The Illinois Department of Healthcare and
		Family Services (IDHFS) reimburses Medicaid-certified nursing homes and supportive living
		facilities assisting living, Home and Community based services waiver option), and complies
		with federal regulations for these, which require such facilities to develop a post-discharge
		plan of care that is developed with resident and family involvement to assist a resident to
		adjust to a new living environment.IDOC is developing a comprehensive screening tool that
		will identify those offenders who have been or are at risk of being homeless at crucial
		quadrants of the offenders stay in the IDOC. The administration of this tool at selected
		intervals of the offenders stay at IDOC will better identify the unique needs of the client and
Discharge Policy (2)	Various State Agencies	more effectively prepare for the best appropriate programming upon returning to the
Discharge Policy (2)	Various State Agencies	community. The long range goal of this screening tool is to assist the offender in maintaining
		housing stability while in the community thereby becoming more productive and reduce
		recidivism. The Corporation for Supportive Housing (CSH) and IDOC continue to collaborate
		in attempting to establish 125 units of permanent supportive housing for the ex-offender
		population. Currently, CSH has been working with the Illinois Criminal Justice Authority,
		IDMH, and the IDOC to create a Prison DataLink (data matching software between DOC and
		IDMH) to better identify previous recipients of state mental health services and target post-
		release hodsney वा ति प्राप्त के release hodsney a pilot project. CSH has also presente विकास practices models
		based on successful Returning Home Initiatives in New York, Connecticut, Minnesota,
OMB Control No: 2506-0117 (ex	p. 07/31/2015)	Washington D.C., and Ohio. In 2008,CSH commissioned 14 planning grants to communities
		identified as high impact in the Governor's Statewide Reentry Commission. The results of
		these planning grants were completed in 2009. Following this, CSH staff chaired the Housing

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
		IDOC has incorporated the use of www.Rentrylllinois.net, www.illinoishousingsearch.org
		and www.Illinoisworkforcenet.org with institutional counselors, Placement Resource Unit
		(PRU) staff and parole agents. These websites were created by agencies and collaborative
		organizations that are sensitive to the barriers of housing experienced by the formerly
		incarcerated. These websites are statewide listings of resources tailored to the needs of the
		10 high impact areas outlined in Inside/Out the Governor's Response to Reentry.IDOC and
		the Illinois Department of Human Services(IDHS) Division of Mental Health(DMH) continue
		discussions concerning the housing needs of ex-offenders with mental health issues through
		the DMH Projects for Assistance in Transition From Homeless (PATH) program. PATH is a case
		management project funded through SAMHSA and administered in Illinois through DMH.
		This collaboration attempts to provide case management supports to ex-offenders in the
		community that meet the criteria for participation. IDOC and IDHS-DMH are addressing this
		collaboration to examine ways to traverse the barriers of long term housing needs for ex-
		offenders with mental illness. DHS-DMH/ PATH Program has collaborated with IDOC and
		piloted the PATH Ex-Offender Reentry Initiative at two correctional facilities, This initiative
		refers offenders with mental disorders that are at risk of homelessness to the PATH
Discharge Policy (3)	Various State Agencies	providers prior to release from the institution. Depending on the length of pre-release
		interaction, the PATH providers begin to link the offender to community services. PATH
		continued involvement with the offender in the community is determined by the need of the
		offender and the severity of the disorder. In Cook County, the Countywide Discharge
		Planning Committee has been meeting regularly. The Committee has been assisting in
		increasing access to mainstream benefits by promoting SOAR Training (SSI/SSDI Outreach,
		Access, and Recovery). A two-day training was successfully held in August. Additionally the
		committee has been evaluating and discussing how the Federal Strategic Plan to Prevent and
		End Homelessness will affect discharge and re-entry planning in the coming years.An
		Interagency Subcommittee of the Illinois Housing Task Force convenes quarterly. The
		purpose of this subcommittee is to allow State agencies that provide housing development
		dollars as well as services funding the opportunity to work together to better service the
		priority populations of the Annual Comprehensive Housing Plan. This committee includes but
		is not limiteenteeties lagencies, as well as the Illinois Departmentee furnan Services
		(Community, Residential, Supervised, Supported, Homeless, and other facilities), Children
OMB Control No: 2506-0117 (e	xp. 07/31/2015)	and Family Services (foster children, subsidized guardianship, emancipated youth), and
		Corrections (persons released from State and local correctional facilities).

Table 3 - Other local / regional / federal planning efforts

Narrative

IHDA's Office of Housing Coordination Services provides overall coordination between State agencies, with statewide trade and membership organizations, regional and local agencies, and local governments. Its 40-member Advisory Committee is represented by these groups as well as non-profit organizations, realtors, developers, builders, and other private industry officials, and meets quarterly. In Illinois, there are 48 CDBG Entitlement communities (plus the State-DCEO) that are responsible for either submitting their own local Consolidated Plan, or are covered by another local Consolidated Plan. As such, these local governments are not covered by the State Consolidated Plan, but are responsible for carrying out their own separate housing strategies. Likewise, local governments that are not Entitlements under CDBG but which apply for funding directly to HUD under other programs are responsible for submitting an abbreviated local Consolidated Plan which they would be responsible for carrying out.

The State and HUD have held occasional workshops since 1992 with local CDBG Entitlement grantees to discuss Consolidated Plan requirements and the availability of relevant information and resources from State agencies and other sources. The relationship between the State and local governments in Illinois is clearly defined in the State Constitution. Those municipalities in Illinois which have Home Rule status (211 municipal units, plus Cook County) have liberal powers. There is a strong sense in Illinois that these powers should not be weakened by the development generally of State regulation. As such, the State Consolidated Plan does not mandate action at the local level; rather the State Consolidated Plan indicates its support for applications by other entities, such as local governments and non-profit and for-profit organizations. For various federal programs administered at the State level (such as CDBG, HOME, and Emergency Solutions Grants), qualifying local governments are generally eligible applicants and can act as sub recipients of funding. To this end, local governments that are covered by the State Consolidated Plan (those that do not have to do a local or abbreviated Consolidated Plan) and which receive funds under the State (CDBG, HOME, and Emergency Shelter Grants) formula grant programs are assisting the State in carrying out its strategy.

OHCS coordinates other activities with local governments and agencies primarily through statewide associations and local meetings.

Presentations of meetings and provision of newsletter articles have been given to the Illinois Municipal League, Illinois Association of Regional Councils, Illinois Association of Housing Authorities, the Illinois Chapter of the National Association of Housing and Redevelopment Officials (NAHRO) and Rural Partners, among others. Finally, local governments are routinely invited to attend major program-related workshops, public

hearings and conferences held or coordinated by IHDA and DCEO. IHDA also works closely with regional chapters of these larger organizations, such as the Metropolitan Mayors Caucus of the Illinois Municipal League and the Metropolitan Planning Council.

AP-12 Participation - 91.115, 91.300(c)

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

The Citizen Participation Plan

The Public Comment period began May 27, 2016 and ended June 27, 2016. The State held one public hearing on Wednesday, June 22, 2016 at 10:00 A.M. It was presented via tele-video conference at the following 3 locations: Illinois Housing Development Authority, 401 North Michigan Avenue-7th Floor, Chicago, Illinois: Department of Commerce and Economic Opportunity (DCEO)4th Floor Conference Room, 500 East Monroe, Springfield; and the Illinois State Regional Office Building-Conference Suite 106, 2309 West Main Street, Marion.

- A 2016 Public Notice was mailed to 35 statewide housing-related agencies or organizations, a number of which included announcement of same in a newsletter or mailing sent to their membership. Copies were sent to the members of the OHCS Advisory Committee and CDBG Entitlement Grantees.
- The Public Notice was published prior to the hearing in the following ten (10) newspapers: the *Belleville News-Democrat*; the *Breeze-Courier*; the *Champaign News Gazette*; the *Daily Southtown*; the *Evansville Courier Press*; the *Peoria Journal-Star*; the *Rockford Register-Star*; the *Rock Island Argus-The Dispatch*; the *Southern Illinoisian*; and the Springfield *State Journal Register*.
- DCEO mailed notices of the public hearing to all CDAP-eligible units of general local government as well as to its mailing list of homeless assistance service provider agencies.
- DCEO carried out additional activities (e.g., application workshops) on the State CDBG Citizen Participation Plan.
- Electronic copies of the draft Consolidated Plan-2016 Action Plan were sent to IHDA Board of Directors, the OHCS Advisory Committee, State Agencies Housing Committee, Illinois Housing Task Force, Affordable Housing Trust Fund Advisory Commission, Community Development Block Grant (CDBG) Entitlement grantees, Community Action Agencies, Regional Planning Commissions, Public Housing Authorities and other groups. The draft plan was also posted on IHDA's website at www.ihda.org. Additional electronic and hard copies of the draft Consolidated Plan-2016 Action Plan were sent to interested parties as requested
- The public hearing was held June 22 via tele-videoconference during the 30-day public comments period in Chicago, Marion, and Springfield. The June 22 date for the hearing was also posted on IHDA's web-site

- All notices and agendas clearly stated that each site was accessible for persons with disabilities. IHDA made reasonable efforts to accommodate persons with sight-and hearing-impaired disabilities, as well as for significant groups of Non-English speaking residents.
- No public comments letters were received during the public comments period.
- The development of both the Citizen Participation Plan and Consolidated Plan provided more than ample opportunity for the public to provide comments.
- All material comments made at the public hearing and in writing have been addressed

Citizen Participation Outreach

Sort Orde	Mode of Outreac	Target of Outreac	Summary of	Summary of	Summary of commen	URL (If applicable)
r	h	h	response/attendanc	comments receive	ts not accepted	
			е	d	and reasons	

Sort Orde	Mode of Outreac	Target of Outreac	Summary of	Summary of	Summary of commen	URL (If applicable)
r	h	h	response/attendanc	comments receive	ts not accepted	
			e	d	and reasons	
			The public hearing			
			was a three-way			
			tele-video			
			conference held			
			Wednesday, June			
			22, 2016 in Chicago,			
			Springfield, and			
			Marion. The			
			meeting was to			
			begin with a			
			presentation on			
			housing activities in			
			the Consolidated	No members of		
			Plan, an historical	the public were in		
			overview of the	attendance in	Not Applicable. No	
		Non-	Consolidated Plan	Chicago,	members of the public	
1	Public Hearing	targeted/broad	development	Springfield or	were in attendance to	
		community	process, a	Marion to provide	provide comments.	
			description of the	public comments	provide comments.	
			Action Plan content,	during the public		
			anticipated funding	hearing		
			levels, and all major			
			proposed changes to			
			the four HUD			
			formula grant			
			programs (CDBG,			
			HOME, ESG and			
			HOPWA) AThreual Action	n Plan	2	8
			audience would2016			
OMB Control No	: 2506-0117 (exp. 07/31/20	15)	have then been			
			invited to provide			
			testimony and			

Sort Orde r	Mode of Outreac h	Target of Outreac h	Summary of response/attendanc e	Summary of comments receive d	Summary of commen ts not accepted and reasons	URL (If applicable)
2	Newspaper Ad	Non- targeted/broad community	Generally, response to newspaper ads will result in attendance at the public hearing, or written letter response or email.	No public comments were received	Not applicable	http://ihda.org
3	Internet Outreach	Non- targeted/broad community	Generally, response to internet outreach will result in attendance at the public hearing, or written letter response or email.	No public comments were received	Not applicable	http://www.ihda.or
4	Public Meeting Non- targeted/broad community		Quarterly meetings of the Office of Housing Coordination Services (OHCS) Advisory Committee, providing a status update on Consolidated Plan activities under the four HUD formula grant programs	Minutes of the quarterly Advisory Committee Meetings are available upon request.	Not applicable. All comments were considered	

Sort Orde r	Mode of Outreac h	Target of Outreac h	Summary of response/attendanc e	Summary of comments receive d	Summary of commen ts not accepted and reasons	URL (If applicable)
	Response to	Non-	No Public Comments			
5	Public Comment	targeted/broad	Letters were	Not applicable	Not applicable.	
	Letters	community	received			

Table 4 – Citizen Participation Outreach

Expected Resources

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

Introduction

Anticipated Resources

Program	Source	Uses of Funds	Ехр	ected Amoun	t Available Ye	ar 1	Expected	Narrative Description
	of Funds		Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$	Amount Available Reminder of ConPlan \$	
CDBG	public -	Acquisition						
	federal	Admin and						
		Planning						
		Economic						
		Development						
		Housing						
		Public						
		Improvements						
		Public Services	26,552,917	0	0	26,552,917	79,658,000	

Program	Source	Uses of Funds	Ехр	ected Amoun	t Available Ye	ar 1	Expected	Narrative Description
	of Funds		Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$	Amount Available Reminder of ConPlan \$	•
НОМЕ	public -	Acquisition						
	federal	Homebuyer						
		assistance						
		Homeowner						
		rehab						
		Multifamily rental						
		new construction						
		Multifamily rental						
		rehab						
		New construction						
		for ownership						
		TBRA	11,652,817	4,000,000	0	15,652,817	33,470,000	

Program	Source	Uses of Funds	Ехр	ected Amoun	t Available Ye	ar 1	Expected	Narrative Description
	of Funds		Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$	Amount Available Reminder of ConPlan \$	
HOPWA	public -	Permanent						Funds will be used to provideshort
	federal	housing in						term rent mortgage and utility
		facilities						assistance, TBRA housing and
		Permanent						supportiveservices to individuals
		housing						living with HIV/AIDS
		placement						
		Short term or						
		transitional						
		housing facilities						
		STRMU						
		Supportive						
		services						
		TBRA	1,172,213	0	0	1,172,213	3,568,000	

Program	Source	Uses of Funds	Ехр	ected Amoun	t Available Ye	ar 1	Expected	Narrative Description
	of Funds		Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$	Amount Available Reminder of ConPlan \$	
ESG	public -	Conversion and						
	federal	rehab for						
		transitional						
		housing						
		Financial						
		Assistance						
		Overnight shelter						
		Rapid re-housing						
		(rental						
		assistance)						
		Rental Assistance						
		Services						
		Transitional						
		housing	4,713,992	0	0	4,713,992	14,141,000	
Other	public -	Public						As there has been no demonstrated
	federal	Improvements						interest in the CDBG-DR (Sandy)
								Housing Program, the State
								anticipates moving the budgeted
								amount of \$3,420,000.00 to Public
			3,420,000	0	0	3,420,000	0	Infrastructure.

Table 5 - Expected Resources – Priority Table

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

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

Acceptable Sources of HOME Match

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

Unacceptable Sources of HOME Match

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

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ESG: Each grant recipient must supplement its Emergency Solutions Grant funds with an equal or greater amount of funds from other sources. 50% of the match must be cash. The amount available for matching fund purposes must be injected during the grant period.

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

CDBG/Community Development Assistance Program:

The State must match all but \$100,000 of the funds received for program administration. Local Public Infrastructure grantees are required to commit a minimum of 25% to the project while Economic Development grants must be matched dollar for dollar. Housing Rehabilitation grants do not require leverage.

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

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

Discussion

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

Annual Goals and Objectives

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

Goals Summary Information

Sort	Goal Name	Start	End	Category	Geographic	Needs Addressed	Funding	Goal Outcome Indicator
Order		Year	Year		Area			
1	Multifamily	2015	2019	Affordable	Statewide	Affordable	HOME:	Rental units constructed: 45
	Affordable Housing			Housing	Distribution	Housing	\$10,487,535	Household Housing Unit
								Rental units rehabilitated: 30
								Household Housing Unit
2	Single Family	2015	2019	Affordable	Statewide	Affordable	CDBG:	Homeowner Housing
	Owner Occupied			Housing	Distribution	Housing	\$6,750,000	Rehabilitated: 150 Household
	Rehabilitation						HOME: \$0	Housing Unit
3	Public	2015	2019	Non-Housing	Statewide	Community and	CDBG:	Public Facility or Infrastructure
	Infrastructure			Community	Distribution	Economic	\$16,656,330	Activities other than
	Activities			Development		Development	CDBG-DR:	Low/Moderate Income Housing
							\$3,420,000	Benefit: 12300 Persons Assisted
4	Economic	2015	2019		Statewide	Community and	CDBG:	Jobs created/retained: 150 Jobs
	Development				Distribution	Economic	\$2,250,000	Businesses assisted: 3 Businesses
						Development		Assisted

Table 6 – Goals Summary

Goal Descriptions

1	Goal Name	Multifamily Affordable Housing
	Goal Description	Goals are determined by dividing multifamily suballocation by per unit cost to determine the number of multifamily HOME units rehabbed or newly constructed.
2	Goal Name	Single Family Owner Occupied Rehabilitation
	Goal Description	HOME single family rehabilitation goals are determined by dividing the single family suballocation by the HOME program per unit cost maximum.
		CDBG Housing Rehabilitation Program goals are determined by dividing the program budget of \$6,750,000 by the grant ceiling of \$450,000 to equal 15 grants; multiplied by the maximum number of homes that can be served at the maximum budget amount per home (\$45,000).
3	Goal Name	Public Infrastructure Activities
	Goal Description	The number of persons served for the Public Infrastructure program is calculated by dividing the program budget of \$14,850,000 by the grant ceiling of \$450,000; equating to 33; and then multiplying by the average number of persons served by each 2015 Public Infrastructure grant (300); equaling 9,900.
		The number of persons served for the Emergency Public Infrastructure program is calculated by dividing the program budget of \$1,806,330 by the grant ceiling of \$200,000; equating to 9; and then multiplying by 100; equaling 900.
		The number of persons served by the redistribution of CDBG-DR (Sandy) funds budgeted for Housing to Public Infrastructure is calculated by dividing the amount of \$3,420,000 by the grant ceiling amount of \$600,000; equating to 5; and then multiplying by the average Public Infrastructure persons served (300); equaling 1500.
		The combination of Public Infrastructure, Emergency Public Infrastructure and CDBG-DR (Sandy) Public Infrastructure is 12,300 persons assisted.
4	Goal Name	Economic Development
	Goal Description	The projected # of communities assisted is calculated by dividing the program budget of \$2,250,000 by the grant ceiling of \$750,000; equating to 3.

Table 7 – Goal Descriptions

AP-25 Allocation Priorities - 91.320(d)

Introduction

HUD regulations provide that three percent (3%) of the CDBG allocation plus \$100,000 can be used for administration and technical assistance for the State-administered program. Therefore the percentages below are based upon the annual allocation minus the allowable administrative amount.

Funding Allocations are as follows:

Funding Allocation Priorities

	Multifamily Affordable	Single Family Owner Occupied	Public Infrastructure	Economic Development	Total
	Housing (%)	Rehabilitation (%)	Activities (%)	(%)	(%)
CDBG	0	26	65	9	100
HOME	100	0	0	0	100
HOPWA	100	0	0	0	100
ESG	100	0	0	0	100
Other CDBG-					
DR	0	0	100	0	100

Table 8 – Funding Allocation Priorities

Reason for Allocation Priorities

Funding percentages for ESG homeless priorities are determined in consultation with Illinois Continuum of Care organizations.

Regarding HOME funds: IHDA has maintained a significant pipeline of affordable rental housing projects seeking HOME assistance.

HOPWA funding only serves people living with HIV/AIDS that are currently housed and with a household income at 80 percent of the area medium income. Funding is provided to six housing facilities that provide emergency shelter for homeless persons living with HIV/AIDS. HOPWA and Ryan White Part B funds provide a safety net for persons living with HIV/AIDS to move or maintain long-term, stable living situations.

Total requests for CDBG Public Infrastructure program funding average more than 5 times the amount available. Economic Development grant opportunities are decreasing with the lack of State funding. More communities are exploring the Housing Rehabilitation program to fill the gap in affordable housing.

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

All HOME funding will result in increasing affordable homeowner and renter opportunities for all subrecipients.

With the first year of National Housing Trust Fund (NHTF) allocation available in 2016, the State expects to provide an additional 16 units of new affordable rental housing to ELI households at 30% AMI or below under NHTF. The State expects to provide an additional 11 rehabilitated rental units of affordable housing to ELI households at 30% AMI or below under NHTF. An amendment is pending to the Five Year Consolidated Plan, to reflect these changes in the State's Strategic Plan.

The Statewide Homeless Continua of Care use ESG funds in combination with HUD Continuum of Care funds and a variety of Federal and State mainstream resources to prevent and end homelessness. The State of Illinois will continue to meet with the Illinois Continua, as well as study their data and their determinations of the 'right mix' of funding allocation for the priority needs.

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

Introduction

Distribution Methods

Table 9 - Distribution Methods by State Program

1	State Program Name:	CDBG Economic Development Grant Program
	Funding Sources:	CDBG
	Describe the state program addressed by the Method of Distribution.	Projects which create and/or retain private, permanent jobs in the industrial and commercial sector will be considered under this component. To be competitive, projects should attract sizable private investment, have solid commitments to create or retain permanent jobs, demonstrate financial feasibility, and benefit low- to moderate-income persons. Further, there must be evidence that the project and related investment would not occur without CDBG involvement.

Describe all of the criteria that will be used to select applications and the relative importance of these criteria. Each application for funding under the general economic development component will be considered using the four categories identified below in determining the appropriate level of financial assistance:

1. Project Benefit

Five factors will be considered under this criterion:

- <u>Project Need</u> Describe in sufficient detail the need for the project and the specific role of CDBG in the project, including any other options which have been pursued.
- <u>Project Design</u> Describe the activities that will be undertaken for this project with an emphasis
 upon project specifics; the reasonableness of activities; their timelines and how the needs,
 activities and projected impact will interrelate.
- <u>Financial Commitments</u> Provide evidence of firm commitments from all lenders and investors for the non-CDBG portion of the project.
- <u>Financial Feasibility</u> Provide adequate documentation of project feasibility and the company's
 ability to bring the project to fruition. Financial feasibility of the project is a measure of the
 company's ability to maintain continuous operation beneficial to the public interests as
 determined by anticipated operational costs of less than or equal to the anticipated income or
 the availability of equity to cover any shortfall based on historical and projected financial
 statements.
- <u>Commitments for Job Creation/Retention</u> Provide firm assurances from the borrower (employer) regarding the number of permanent jobs to be created or retained for low-to-moderate income persons, types of positions and the time frame for job creation.

2. Benefit to Low-to-Moderate Income Persons

Projects eligible for funding consideration must benefit at least 51 percent low-to-moderate income persons. All applicants must identify the methodology used to determine the percentage of project benefit to low-to-moderate income persons, except that a person may be presumed to be low and moderate income if the person resided in a federally-designated Empowerment Zone or Enterprise Community, or both the business and the jobs that have been created or retained are located in a federally-designated Empowerment Zone or Enterprise Community.

3. CDBG Dollars to Full-Time Equivalent (FTE) Jobs Ratio

This factor considers the number of permanent FTE jobs to be created or retained with CDBG dollars within a specified period, with a maximum period of 24 months from the date funds are awarded, upon the written commitment of the borrower (employer). Projects should demonstrate at least one FTE job

OMB Control No: 2506-0117 (exp. 07/31/2015)

If only summary criteria were	Application Guidelines and forms can be found at:http://www.illinois.gov/dceo
described, how can potential	
applicants access application	
manuals or other	
state publications describing	
the application criteria?	
(CDBG only)	
Describe the process for	
awarding funds to state	
recipients and how the state	
will make its allocation	
available	
to units of general local	
government, and non-profit	
organizations, including	
community and faith-based	
organizations. (ESG only)	
Identify the method of	
selecting project sponsors	
(including providing full	
access to grassroots faith-	
based and other	
community-based	
organizations). (HOPWA only)	

Describe how resources will	Program Category	Budget	Ceiling	<u>Deadline</u>
be allocated among funding	Ongoing (non-competitive Programs			
categories.	Economic Development (ED)	\$2,250,000	\$750,000	NA
	Emergency Public Infrastructure (EPI)	\$1,806,330	\$200,000	NA
	<u>Competitive Programs</u>			
	Public Infrastructure (PI)	\$14,850,000	\$450,000	9/30/2016
	Housing Rehabilitation (HR)	\$6,750,000	\$450,000	9/30/2016
Describe threshold factors and grant size limits.	Eligible activities may include funding for construction and renovation and improdevelopment. The refinancing of existic considered on an individual basis.	vements to pul	olic infrastruc	ture that directly support econor

	What are the outcome measures expected as a result of the method of distribution?	The projected # of communities assisted is calculated by dividing the program budget of \$2,250,000 by the grant ceiling of \$750,000; equating to 3.
2	State Program Name:	CDBG Emergency Public Infrastructure Grant Program
	Funding Sources:	CDBG
	Describe the state program addressed by the Method of Distribution.	This program is designed for communities experiencing an imminent and urgent threat to public health and safety, when the need for funds arises outside the normal competitive-bid funding cycle and requires immediate attention. An activity that meets HUD guidelines for eligible activities for public infrastructure projects may be funded.

Describe all of the criteria	Projects will be evaluated according to the following criteria:
that will be used to select	
applications and the relative importance of these criteria.	1. Individual grants are requested to have 25% of the total project cost funded by other sources. If the applicant cannot fund the 25%, a waiver may be requested.
	2. Documentation must present the seriousness and urgency of the threat to health and safety of the community's residents.
	3. Documentation must present evidence of the unexpected nature of the threat, the degree to which the community was unable to plan for the threat because it could not be foreseen, and the threat's occurrence within the last 18 months.
	4. Evidence must show that the project is ready to proceed and expend funds and that the project adequately addresses the identified problem.
	5. Each application should document financial need for CDBG assistance. The application should include information regarding the local government's financial constraints, including availability of cash outstanding indebtedness, bonding capacity, and service rate increases
If only summary criteria were	Application Guidelines and forms can be found at:http://www.illinois.gov/dceo
described, how can potential	
applicants access application manuals or other	
state publications describing the application criteria? (CDBG only)	

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

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	Emergency Public Infrastructure (EPI)	\$1,806,330	\$200,000	NA
	<u>Competitive Programs</u>			
	Public Infrastructure (PI)	\$14,850,000	\$450,000	9/30/2016
	Housing Rehabilitation (HR)	\$6,750,000	\$450,000	9/30/2016
Describe threshold factors	Eligibility Threshold requirements:			
and grant size limits.	Low-to-Moderate Income Com	munity (51% o	greater) (Y o	r N)
	1. Threat to Health and Safety (Y	or N)		
What are the outcome	The projected # of communities assiste	ed is calculated	by dividing th	e program budget of \$1,806,330 b
measures expected as a result	the grant ceiling of \$200,000; equating	to 9; and then	multiplying b	y 100; equaling 900 persons serve
of the method of				
distribution?				

			3	
	te Program Name: CDBG Housing Rehabilitation Gra	ate Program Name:	•	
	ading Sources: CDBG	inding Sources:		
	dressed by the Method of	escribe the state program Idressed by the Method of stribution.		
	scribe all of the criteria Evaluation Criteria (55 Maximun	escribe all of the criteria		
The maximum available points per application are 55 points. The maximum scores available for each of the four scoring criteria are:				
	portance of these criteria. 1. Project Need – Maximu	portance of these criteria.		
	The selected target area rehabilitation of income eligible hin the Housing Fact Sheet.			
	2. <u>Project Impact – Maxim</u>			
	Description of targeted area selec			
	3. <u>Coordination of Resour</u>			
	Scores will be provided based up resources which will provide assist programs.			
	4. <u>Project Readiness – Ma</u>			
	Scores will be provided based up and technical issues involved in a			
t .	the four scoring criteria are: 1. Project Need – Maximu The selected target area rehabilitation of income eligible hin the Housing Fact Sheet. 2. Project Impact – Maximu Description of targeted area selected	oplications and the relative aportance of these criteria.		

If only summary criteria were described, how can potential applicants access application manuals or other	Application Guidelines and forms can be found at:http://www.illinois.gov/dceo
state publications describing the application criteria? (CDBG only)	
Describe the process for awarding funds to state recipients and how the state will make its allocation available	
to units of general local government, and non-profit organizations, including community and faith-based organizations. (ESG only)	
Identify the method of selecting project sponsors (including providing full access to grassroots faithbased and other	
community-based organizations). (HOPWA only)	

Describe how resources will	Program Category	Budget	Ceiling	<u>Deadline</u>
be allocated among funding	Ongoing (non-competitive Programs			
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	<u>Competitive Programs</u>			
	Public Infrastructure (PI)	\$14,850,000	\$450,000	9/30/2016
	Housing Rehabilitation (HR)	\$6,750,000	\$450,000	9/30/2016
Describe threshold factors and grant size limits.	Benefit to Low-and-Moderate Income I proposed project will benefit 100% low than 100% low-to-moderate income pe	-to-moderate i	ncome persoi	ns. Those projects benefiting less

	What are the outcome measures expected as a result of the method of distribution?	
4	State Program Name:	CDBG Public Infrastructure Grant Program
	Funding Sources:	CDBG
	Describe the state program addressed by the Method of Distribution.	The objective of this competitive program component is to fund public infrastructure projects, with priority given to projects involving water and sanitary systems, or storm sewer upgrades.

Describe all of the criteria that will be used to select applications and the relative importance of these criteria.

Evaluation Criteria that will be graded and scored:

- Low to Moderate Income Level (25 pts)
- Threat to Health & Safety/Urgency (25 pts)
- Project Readiness (50 pts)
- 1. <u>Benefit to Low-to-Moderate Income Persons</u>: Each application must include documentation that the proposed project will benefit at least 51.0 percent LMI persons. Those projects benefiting less than 51.0 percent LMI persons will not be considered for funding. Each application must include documentation that any assessment levied against property (e.g., "tap-on" fee) occupied by low-to-moderate income persons will be waived or paid on behalf of the LMI households and document that assistance to pay the cost of "hooking up" (i.e., installing the privately owned and maintained line between a service lead/connection and a structure) will be offered to all residential households occupied by LMI persons.
- 2. <u>Documentation of Threat to Health and Safety</u>: Each application should detail the public infrastructure needs to be addressed by the proposed project. This narrative should include, as appropriate, the degree to which present conditions affect public health and safety, the severity and immediacy of the problem, and whether the proposed activities are necessary to comply with state or federal regulations.

A serious threat to health and safety is defined as a deficiency in the community public facility; the community lacks the facility entirely; problems clearly attributable to the deficiency have occurred, such as serious illness, disease outbreak, or serious environmental pollution; and the problem is present, continual, and chronic as opposed to occasional, sporadic, or probable. **Threat to Health & Safety documentation should be no more than five (5) years old**.

3. <u>Project Readiness</u>: Each application must demonstrate that the proposed project is appropriate and achievable and that all actions have been completed to ensure timely implementation of the project. All applicants will start with the **maximum 50 points**. Deductions will be made when readiness requirements are lacking.

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If only summary criteria were	Application Guidelines and forms can be found at:http://www.illinois.gov/dceo
described, how can potential	
applicants access application	
manuals or other	
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e allocated among funding	Ongoing (non-competitive Programs			
tegories.	Economic Development (ED)	\$2,250,000	\$750,000	NA
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	<u>Competitive Programs</u>			
	Public Infrastructure (PI)	\$14,850,000	\$450,000	9/30/2016
	Housing Rehabilitation (HR)	\$6,750,000	\$450,000	9/30/2016
escribe threshold factors	Eligibility Threshold requirements:			
nd grant size limits.	Low-to-Moderate Income Com	munity (51% or	greater) (Y o	r N)
	1. Threat to Health and Safety (Y	or N)		

	What are the outcome measures expected as a result of the method of distribution?	The number of persons served for the Public Infrastructure program is calculated by dividing the program budget of \$14,850,000 by the grant ceiling of \$450,000; equating to 33; and then multiplying by the average number of persons served by each 2015 Public Infrastructure grant (300); equaling 9,900.
5	State Program Name:	CDBG Section 108 Loan Guarantee Program
	Funding Sources:	CDBG
	Describe the state program addressed by the Method of Distribution.	The Section 108 Loan Guarantee Program is available to communities in Illinois as a source of financing for large-scale economic development, housing rehabilitation, public facilities, and physical development projects. The Section 108 Loan program is one of the most potent and important public investment tools that HUD offers to local and state governments. It allows them to transform a small portion of their CDBG funds into federally guaranteed loans large enough to pursue physical and economic revitalization projects that can renew entire neighborhoods or communities. Such public investment is often needed to inspire private economic activity, provide the initial resources or create the confidence that private firms and individuals may need to invest in distressed areas

Describe all of the criteria that will be used to select applications and the relative importance of these criteria.	In order to be eligible a project must meet all applicable CDBG requirements and result in significant employment and/or benefit for low and moderate income persons. Projects that are eligible for financing under existing federal, state, regional or local programs will generally not be considered for guarantee assistance unless the programs would fail to fully meet a project's need.
If only summary criteria were described, how can potential applicants access application manuals or other	Application Guidelines and forms will be available at:http://www.illinois.gov/dceo
state publications describing the application criteria? (CDBG only)	

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

	Describe how resources will be allocated among funding categories.	
	Describe threshold factors and grant size limits.	The state has applied for a maximum of \$130,000,000 in Section 108 guaranteed loan funds which is approximately five times the amount of the State's FFY 2012 CDBG allocation. Maximum loan guarantee amount: \$20,000,000 per project. However, in the interests of limiting exposure and promoting a diversified portfolio, the Department reserves the right to limit the amounts pledged to any one unit of local government or business interest.
		Recipients of prior CDBG funding that have outstanding audit or monitoring findings and/or other program exceptions which involve a violation of federal, state or local law or regulation, and/or that have failed to substantially meet their proposed accomplishments in their current CDBG projects are ineligible for 108 consideration.

	What are the outcome measures expected as a result of the method of distribution?	
6	State Program Name:	CDBG-DR Sandy Public Infrastructure Grants
	Funding Sources:	CDBG-DR
	Describe the state program addressed by the Method of Distribution.	Public Infrastructure activities made necessary by disasters in local governments (including cities, towns, counties, etc.) within Illinois counties identified as federal disaster areas as a result of the disasters of 2011-2013.

Describe all of the criteria that will be used to select applications and the relative importance of these criteria.

I. Program Activities and Requirements

1. CDBG National Objective Requirements:

Proposed projects seeking CDBG-DR funding must meet one of the following national objectives:

1. Principally benefit low- and moderate-income persons; Aid in the prevention or elimination of slums or blight; or Meet community development needs having a particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community where other financial resources are not available.

1. Eligible Activities:

The funding priority for the Public Infrastructure Program is for water/sewer systems, storm drainage systems, levee systems, and roads and bridges. The purpose is to financially support projects that FEMA or other sources cannot fund, but which are nevertheless critical to recovery.

All proposed levee projects must be in compliance with Illinois Executive Order Number 5 (2006) – Construction Activities in Special Flood Hazard Areas and approved by the Illinois Department of Natural Resources (IDNR), Office of Water Resources.

1. Ineligible Activities:

Ineligible activities include general government expenses such as bad debts; fines and penalties; legislative expenses; political activities; purchase of equipment; and operating and maintenance expenses. Disaster clean-up costs are also ineligible.

1. Overall LMI Benefit Requirement:

At least 50 percent of the CDBG disaster recovery funds received by the State of Illinois must be awarded for activities that will principally benefit low- and moderate-income persons. Individual projects that can support the low-to-moderate benefit objective, will assist the state in meeting the objective to award 50% of program funds to support projects that support the LMI-benefit.

If only summary criteria were	Application Guidelines and forms can be found at:http://www.illinois.gov/dceo
described, how can potential	
applicants access application	
manuals or other	
state publications describing	
the application criteria?	
(CDBG only)	
Describe the process for	
awarding funds to state	
recipients and how the state	
will make its allocation	
available	
to units of general local	
government, and non-profit	
organizations, including	
community and faith-based	
organizations. (ESG only)	
Identify the method of	
selecting project sponsors	
(including providing full	
access to grassroots faith-	
based and other	
community-based	
organizations). (HOPWA only)	

Describe how resources will be allocated among funding categories.	Each eligible application that has passed the threshold criteria screening will be reviewed, rated, and ranked by an evaluation and selection committee using the criteria for selection in the State of Illinois Action Plan and Amendments. Funds will be awarded until exhausted.

Describe threshold factors and grant size limits.

In order to be considered for evaluation for funding the project must first meet certain minimum requirements as established by HUD and DCEO. These requirements are identified as "Threshold Criteria" and include application submission requirements, application eligibility, project eligibility, HUD national objectives, and DCEO action plan requirements.

The threshold criteria are:

- a) The applicant's local government must be an eligible applicant under Illinois CDBG-DR program and be located in one of the disaster declared counties (see Attachment A)
- c) The activity must be eligible under the CDBG-DR program pursuant to 24 CFR 570.200 570.205 and not expressly ineligible pursuant to 570.207. It must also be an eligible CDBG -DR Public Infrastructure project as specified in the Illinois CDBG-DR Action Plan, and any plan amendments, or amendments for Supplemental CDBG-DR Funding.
- d) The project must meet one of the national objectives of the CDBG program:
- i) Primarily benefit persons of low and moderate income;
- ii) Meet community development needs having a particular urgency; or
- iii) Aid in the prevention or elimination of slums or blight.
- e) The project must address short or long term public infrastructure needs arising from disasters in 2011-2013. Be sure to clearly explain the direct impact the storm(s) damage to the public infrastructure and any other community damage due to the failure of that infrastructure. Explain when the damage occurred, the current condition of the infrastructure, and how the project relates to disaster recovery. Where possible include supporting documentation (i.e. well water tests, damage reports, photographs, engineer certifications, etc.).
- f) The project is the best alternative to resolve the need. Be sure to clearly explain the different alternatives for meeting the need including cost, outcomes, and short and long term impacts.

	What are the outcome measures expected as a result of the method of distribution?	
7	State Program Name:	Emergency Solutions Grant Program
	Funding Sources:	ESG
	Describe the state program addressed by the Method of Distribution.	The Emergency Solutions Grant provides funding to engage homeless individuals and families living on the street; improve the number and quality of emergency shelters for homeless individuals and families; help operate these shelters; provide essential services to shelter residents; rapidly re-house homeless individuals and families, and prevent families/individuals from becoming homeless.

Describe all of the criteria	Recommendations for funding are based on: the needs assessment conducted by the CoC, housing
that will be used to select	analysis, and performance of the provider agency (based on HMIS and other factors).
applications and the relative	
importance of these criteria.	
If only summary criteria were	
described, how can potential	
applicants access application	
manuals or other	
state publications describing	
the application criteria?	
(CDBG only)	

Describe the process for	Deliberate steps are taken to identify the providers, either units of local government or not-for-profit
awarding funds to state	organizations, based on regional need and the ability to administer and expend the funds. The
recipients and how the state	Department uses a formula based spreadsheet in order to determine the amount of ESG funding for
will make its allocation	each CoC. The spreadsheet includes statistical data for poverty, housing, population, etc These
available	amounts are then provided to each CoC with a request for funding recommendations. They are asked
avanasie	to provide the organization name, amount of funding recommended and the activities recommended
to units of general local	for funding. The recommended organizations are required to submit a completed application including
government, and non-profit	a budget. The applications are reviewed for completeness by at least 2 staff persons. If necessary, a list
organizations, including	of "Outstanding Application Requirements" is sent to the provider detailing documentation is still
community and faith-based	needed.
organizations. (ESG only)	
Identify the method of	
selecting project sponsors	
(including providing full	
access to grassroots faith-	
based and other	
Daseu allu Utilei	
community-based	
organizations). (HOPWA only)	

Describe how resources will be allocated among funding categories.	Resources are allocated based on CoC recommendations as needs vary across communities.
Describe threshold factors and grant size limits.	ESG minimum grant award is \$25,000. Recipients must be a participating member of a CoC.
What are the outcome measures expected as a result of the method of distribution?	ESG funds will be used to provide affordability of decent housing through homeless prevention and rapid re-housing activities; and will provide availability/accessibility of a suitable living environment homeless individuals and families who need emergency shelter.

State Program Name:	HOME Multifamily (Including CHDO)
Funding Sources:	HOME
Describe the state program addressed by the Method of Distribution.	Multifamily new construction and rehabilitation (including Community Housing Development Organizations - CHDOs)
Describe all of the criteria that will be used to select applications and the relative importance of these criteria.	Review and selection criteria include but are not limited to financial feasibility (using IHDA-published underwriting criteria), site and market feasibility, development/management team capacity and experience, site control, commitment of leveraged resources, and other factors. These increase if the Low Income Housing Tax Credit is involved, as it has its own separate application scoring system.
If only summary criteria were described, how can potential applicants access application manuals or other	IHDA's multifamily common application system, forms, and instructions are posted on IHDA's website at www.ihda.org/developer/forms.htm#referenceDocuments
state publications describing the application criteria? (CDBG only)	

Describe the process for awarding funds to state recipients and how the state will make its allocation available	IHDA's Common Application process/format is utilized for all HOME multifamily projects, including CHDO-owned properties. After staff review (completeness, eligibility, site and market feasibility, underwriting), projects then go through a staff peer review, by internal IHDA Loan Committee, and t the IHDA Board for final consideration and approval.
to units of general local government, and non-profit organizations, including community and faith-based organizations. (ESG only)	
Identify the method of selecting project sponsors (including providing full access to grassroots faithbased and other	
community-based organizations). (HOPWA only)	

Describe how resources will be allocated among funding categories.	IHDA utilizes HOME funding for both rental housing development/rehabilitation as well as homeown rehabilitation. each has its own application and funding process. funding allocation is based on a number of factors including available resources, anticipated program income, anticipated completion timeframe for existing programs, pipeline of approved projects requesting HOME funding, and alternative funding sources available, among other factors.
Describe threshold factors and grant size limits.	Threshold factors are described in detail in the multifamily common spplication referenced above. Grant (loan) size limits have been imposed recently for IHDA's subordinate debt sources (i.e., primar HOME and (State) Affordable Housing Trust Fund) due to relative lack of availability to meet demand It is primarily involving projects also seeking Low Income Housing Tax Credit assistance. for non-met and AHPAA area, it is set at 20% of total development costs, capped at a maximum request of \$2 million. for Chicago, Chicago metro, and other metro areas, it is set at 10% of total development cost capped at a maximum request of \$1 million.
What are the outcome measures expected as a result of the method of distribution?	Decent and safe affordable housing

9	State Program Name:	HOME Single Family Owner Occupied Rehab
	Funding Sources:	HOME
	Describe the state program addressed by the Method of Distribution.	Single family owner-occupied rehabilitation program (SFOOR)
	Describe all of the criteria	HOME Homeownership Ranking Criteria
	that will be used to select applications and the relative	Maximum Points for Previously Funded Agencies (Minimum points for funding of previously funded agencies is 72 of 100 possible points)
	importance of these criteria.	Past Performance and Agency Capacity-40 points Max
		Team Capacity and Experience-30 Max
		Agency HOME Program Impact-5 Max
		Agency Home Program Design-25 Max
		Maximum Points for New Agencies (Minimum points for funding of new agencies is 62 of 90 possible points)
		Past Performance and Agency Capacity-30 points Max
		Team Capacity and Experience-30 Max
		Agency HOME Program Impact-5 Max
		Agency Home Program Design- 25 Max

If only summary criteria were described, how can potential applicants access application manuals or other	The relevant HOME application manuals and other publications describing the application criteria are found on the IHDA website at www.ihda.org/developer/forms.htm#referenceDocuments
state publications describing the application criteria? (CDBG only)	
Describe the process for awarding funds to state recipients and how the state will make its allocation available	Staff review (including site and market feasibility and underwriting), then to internal IHDA Loan Committee before going to the IHDA Board for final funding consideration and approval
to units of general local government, and non-profit organizations, including community and faith-based organizations. (ESG only)	
Identify the method of selecting project sponsors (including providing full access to grassroots faithbased and other	
community-based organizations). (HOPWA only)	

rehabilitation. Each has its own application and funding process. Funding allocation is based on a number of factors including available resources, anticipated program income, anticipated completic timeframe for existing programs, pipeline of approved projects requesting HOME funding, and alternative funding souces available, among other factors.
For HOME, the maximum SFOOR grant funding is \$330,000, based on the number of houses to be rehabilitated, the size of the service area, and ranking score.
Providing decent, safe, affordable housing

10	State Program Name:	HOPWA Facility-Based Housing Operations Assistance Program
	Funding Sources:	
	Describe the state program addressed by the Method of Distribution.	This program provides eligible AIDS designated-housing facilities with funds for the provision of meals and lodging to residents; rehabilitation and repair of facilities; operating costs which may include maintenance, security, insurance, utilities, furnishings, equipment, supplies and other incidental costs of the facility; and supportive services such as case management, mental health counseling, and substance abuse treatment provided to facility residents.
		The Department developed an application for use by all HIV Care Connect to prepare their initial HOPWA funding plans. The application required all project sponsors to describe the intended service area, the population of persons with HIV/AIDS, and the housing service needs not currently being addressed by available public and/or private resources within the service area. Additionally, the Department required a project plan and budget, including measurable goals and objectives, project coordination and how the project would be continued if HOPWA funds were reduced or not available in future years. The application process incorporated a deadline for submission of applications
	Describe all of the criteria that will be used to select applications and the relative importance of these criteria.	The Illinois Department of Public Health's application for HOPWA funding requires all applicants, including HIV Care Connect Regions, to describe the regional area to be served by the applicant, the population of persons with HIV/AIDS in the proposed regional area to be served, and the housing service needs not currently being addressed by available public and/or private resources within the proposed service area. IDPH requires a project plan and budget as part of the application process, including measurable goals, objectives, project coordination, and information on how the project would be continued if HOPWA funds were reduced or not available in future years. The application process incorporates a deadline for submission of applications

	T
If only summary criteria were described, how can potential applicants access application manuals or other state publications describing	
the application criteria?	
(CDBG only)	
Describe the process for	
awarding funds to state	
recipients and how the state	
will make its allocation	
available	
to units of general local	
government, and non-profit	
organizations, including	
community and faith-based	
organizations. (ESG only)	
Identify the method of	The selection process is baased on the Lead Agencies that receive funding for Ryan White Title II fund
selecting project sponsors	The Department allows the HIV Care Connect Lead Agents to subcontract with local service providers
(including providing full	for housing services. The Department holds meetings with lead agencies, giving instruction on how to
access to grassroots faith-	include faith-based organizations as entities eligible to apply for funding.
based and other	
community-based	
organizations). (HOPWA only)	

Describe how resources will be allocated among funding categories.	The application required all housing. The application required all project sponsors to describe the intended service area, the population of persons with HIV/AIDS, and the housing service needs not currently being addressed by available public and/or private resources within the service area. Additionally, the Department required a project plan and budget, including measurable goals and objectives, project coordination and how the project would be continued if HOPWA funds were reduced or not available in future years. faciaties to describe the intended service area, the population of persons with HIV/AIDS, and the housing service needs not currently being addressed by available public and/or private resources within the service area. Additionally, the Department required a project plan and budget, including measurable goals and objectives, project coordination and how the project would be continued if HOPWA funds were reduced or not available in future years.
Describe threshold factors and grant size limits.	AIDS housing facilities which are located in the HIV Care Connect Region received funding to service persons living HIV/AIDS who are in need of housing and supportive services. Maximum grant amount are dependent on funding availability.

	What are the outcome measures expected as a result of the method of distribution?	The number of clients provided decent, safe and affordable housing.
11	State Program Name: Funding Sources:	HOPWA Short-term Rent, Utility, Mortgage
	Describe the state program addressed by the Method of Distribution.	The HOPWA Short-term Rent, Utility and Mortgage Program (STRUM) provides rent, mortgage and utility assistance to persons living with HIV/AIDS. The Illinois HOPWA program eligibility is based on a households income being at or below 80% of the Area Median Income (AMI). The individual requesting assistance must deomonstrate a need for housing assistance.
	Describe all of the criteria that will be used to select applications and the relative importance of these criteria.	The Illinois Department of Public Health's application for HOPWA funding requires all applicants, including HIV Care Connect Regions, to describe the regional area to be served by the applicant, the population of persons with HIV/AIDS in the proposed regional area to be served, and the housing service needs not currently being addressed by available public and/or private resources within the proposed service area. IDPH requires a project plan and budget as part of the application process, including measurable goals, objectives, project coordination, and information on how the project would be continued if HOPWA funds were reduced or not available in future years. The application process incorporates a deadline for submission of applications.

	T
If only summary criteria were	
described, how can potential	
applicants access application	
manuals or other	
state publications describing	
the application criteria?	
(CDBG only)	
Describe the process for	
awarding funds to state	
recipients and how the state	
will make its allocation	
available	
to units of general local	
government, and non-profit	
organizations, including	
community and faith-based	
organizations. (ESG only)	
Identify the method of	The selection process is based on the Lead Agents that receives funding for the Ryan White Title II
selecting project sponsors	funds. The Department allows the HIV Care Connect Lead Agents to subcontract with local service
(including providing full	providers for housing services. The Department recently held a meeting with lead agents, giving
access to grassroots faith-	instructions how to include faith-based organizations as entities eligible to apply for funding.
based and other	
community-based	
organizations). (HOPWA only)	

Describe how resources will be allocated among funding categories.

Each Regional office has a local advisory board to assist the lead agency with determining priority services. The type of collaboration brings a wide variety of people together to address a very complex disease. The HIV Care regions have experience in identifying needs, planning, contracting for services, developing formal linkages with service providers and providing a continuum of care to persons with HIV/AIDS. The work plan will include descriptions of populations to be served, the care and service needs of the populations and ways in which the HIV Care Connect Regions will insure that the most in need will receive housing assistance. The application requires all HIV Care Connect Regions to describe the intended regional area to be served, the population of persons with HIV/AIDS, and the housing service needs not currently being addressed by public and private resources within the service area. HIV Care Connect Regions would like to address transitional housing needs for homeless individuals and families needing to move to more permanent housing.

Describe threshold factors and grant size limits.

The HIV Care Connect Region funding formula is based on an annual award amount that is based on the morbidity data. Initially, allocation was based on each area's proportionate share of the cumulative number of living HIV and AIDS cases and funding availability. All HIV Care Connect funding increases are based on the increase of housing costs of service and the number of persons served. Funding is also based on local availability of resources as well as other community resources. The Department developed an application for use by all HIV Care Connect Regions to prepare their initial HOPWA funding plans. The application required all project sponsors to describe the intended service area, the population of persons with HIV/AIDS, and the housing service needs not currently being addressed by available public and/or private resources within the service area. Additionally, the Department required a project plan and budget, including measurable goals and objectives, project coordination and how the project would be continued if HOPWA funds were reduced or not available in future years. The application process incoporated a deadline for submission of applications.

	What are the outcome measures expected as a result of the method of distribution?	The number of households stably housed by the program is an important outcome measure for STRUM. The prevention of homelessness is the most important element of administering the HOPWA program. Persons living with HIV/AIDS require stable housing in order to receive effective healthcare treatment. All program activities must be administered in accordance with the Department of Housing and Urban Development HOPWA Rules and Regulations. HOPWA grantees are encouraged to develop community-wide strategies through forming partnerships with area non-profits to provide housing assistance and supportive services for eligible persons. HOPWA grantees are urged to require eligible clients to access mainstream entitlement housing and utility assistance programs before accessing HOPWA funds. The number of households stably housed.
12	State Program Name:	HOPWA Tenant Based Rental Assistance
	Funding Sources:	HOPWA
	Describe the state program addressed by the Method of Distribution.	In 2015, the Winnebago County Health Department application described its intent to provide tenant based rental assistance due to the number of persons living with HIV/AIDS that do not have an emergency need for receiving Short Term Rent Mortgage and Utility assistance. As a result, a total of 10 persons living with HIV/AIDS are provided with affordable housing. Stable housing provides a foundation for individuals with chronic illness such as HIV/AIDS, to improve their health outcomes.

Describe all of the criteria	Winnebago County Health Department submitted an application of their intent to explore the option of
that will be used to select	providing TBRA to HIV/AIDS clients residing in northwestern Illinois. The Housing Coordinator
applications and the relative	requested technical assistance from the HUD office to carry out a pilot project with the Winnebago
importance of these criteria.	County Health Department office on providing tenant-based housing assistance to persons residing in the HIV Care connect Region due to guideline changes for the short-term rent mortgage and utility assistance program. Changes in guidelines posed unique challenges in different areas of Illinois. There continues to be a challenge for case managers to demonstrate that an individual who is already living in poverty has an emergency need to qualify for the STRMU program. Winnebago County Health department HIV Care Connect region piloted the tenant based housing assistance program in 2015. HUD technical assistance group will be providing assistance to the region on how to sustain the pilot tenant based program.
If only summary criteria were described, how can potential applicants access application manuals or other	
state publications describing the application criteria? (CDBG only)	

Describe the process for awarding funds to state recipients and how the state will make its allocation available to units of general local government, and non-profit organizations, including community and faith-based organizations. (ESG only) The selection process is based on the Lead Agencies that receive funding under the Ryan White Title II Identify the method of funds. The Department allows the HIV Care Connect Lead Agents to subcontract with local service selecting project sponsors providers for housing services. The Department recently holds meetings with lead agents, giving (including providing full instructions on how to include faith-based organizations as entities eligible to apply for funding. access to grassroots faithbased and other community-based organizations). (HOPWA only)

Describe how resources will be allocated among funding categories.	Resources that are allocated through the HIV Care Region are based on the guidelines established for the tenant based program.
Describe threshold factors and grant size limits.	
What are the outcome measures expected as a result of the method of distribution?	Units of safe and affordable housing provided to HIV/AIDS clients is the expected outcome of the method of distribution. Housing for persons with HIV/AIDS is an important component of the nation response to AIDS. The National AIDS Strategy recognizes that housing is essential in providing health care and other support and sets a goal for ensuring that all persons with HIV have access to services and housing that is affordable, of high quality and responsive to their needs.

13	State Program Name:	National Housing Trust Fund (NHTF)
	Funding Sources:	
	Describe the state program addressed by the Method of Distribution.	Multi-family rental housing development (new construction or acquisition/rehabilitation. The Illinois Housing Development Authority (IHDA) has been designated by the Governor as the administering State agency for the newly-funded NHTF. Authorizing statute and HUD's interim rule place specific parameters on the eligible uses of these funds. State NHTF grantees are allowed to provide direct funding to subgrantee local governments to operate their own local programs/projects, but not required to do so. Given the relatively small size of the State's initial allocation the first year, the State does not intend to use subgrantees in the 2016 funding cycle.
		As the national funding level fell below \$1 Billion in 2016, 100% of program funds must be used to benefit Extremely Low-Income (ELI) households, defined as 30% of area median income or less.
		States must use at least 80% of all funds (or 90% of program funds) for rental housing/renters. IHDA is allowed to use up to 10% of remaining program funds for homeownership assistance. IHDA will use 90% of all funds (100% of all program funds) for rental housing.
		There is also an allowance to use up to 10% of all funds for general administration and planning costs. IHDA will use said funds for this purpose, which also include affirmatively furthering fair housing activities.

Describe all of the criteria that will be used to select applications and the relative importance of these criteria. IHDA will use its Multi-Family "Common Application" as the major application format for NHTF rental housing projects, the same one used for the LIHTC and HOME programs, along with supplemental information required by program rules (see below). IHDA's process will include an initial completeness/eligibility scoring, review of mandatory requirements, underwriting, site and market review, peer review, internal Loan Committee and IHDA Board approval. A separate Request for Proposals (RFP) process will be used if needed to expedite obligation of program funds.

<u>Geographic Diversity:</u> Given the relatively small size of the first-year HTF allocation, IHDA will not establish geographic set-asides, but strive to achieve maximum geographic diversity in its final funding decisions.

Applicant Capacity: As part of IHDA's application process, each proposed project's development and management team will be reviewed to ensure that if the developer/owner has appropriate experience, capacity, and staffing to own, develop, and manage the project if approved for funding. This will include IHDA's past experience with team members, and review of HUD previous participation certificates where applicable. IHDA will also strongly encourage first-time developers to partner with an experienced non-profit or for-profit entity.

<u>Project-Based Rental Assistance:</u> HDA will prioritize all rental projects which have committed or available federal, State, and local project-based rental assistance so that rents are affordable to ELI families. These may include: Section 8 Project-Based (preservation only); Project-Based Vouchers; Rental Housing Support Program; and Section 811 Project-Based Rental Assistance. It will utilize 30% of household income for rents and utilities as its standard.

<u>Duration of Affordability Period:</u> Applicants must document the extent to which proposed rents are affordable, especially to ELI households. All projects will be required to establish a minimum 30-year affordability period. This will work well particularly for LIHTC projects (extended use periods). Applicants are encouraged to establish longer affordability periods but must meet this minimum.

Priority Housing Needs of the State: These are defined on the State's Comprehensive Planning Act, and include ELI households, low-income seniors, low-income persons with disabilities, and homeless and atrisk homeless persons and families, as well as preservation and live-near-work projects. These are also the same priorities in the State's Five-year Consolidated Plan. Proposed projects must also fall under one of the state's Focus Areas Action plan, which are supportive housing, community revitalization, and economic development.

Projects will also be reviewed to evaluate their "readiness to proceed" in starting projects after funding approval, and then evaluating the applicant's ability to obligate funds in a timely manner

OMB Control No: 2506-0117 (exp. 07/31/2015)

If only summary criteria were described, how can potential applicants access application manuals or other	Eligible recipients include for profit and non-profit corporations, and governmental entities, including public housing authorities. See IHDA's website (www.ihda.org) for additional information. There will be an open application process until all funds are committed.
state publications describing the application criteria? (CDBG only)	
Describe the process for awarding funds to state recipients and how the state will make its allocation available	
to units of general local government, and non-profit organizations, including community and faith-based	
organizations. (ESG only) Identify the method of selecting project sponsors (including providing full access to grassroots faithbased and other	
community-based organizations). (HOPWA only)	

Describe how resources will be allocated among funding categories.	As the national funding level fell below \$1 Billion in 2016, 100% of program funds must be used to benefit Extremely Low-Income (ELI) households, defined as 30% of area median income or less. The first-year Illinois NHTF allocation is \$4,302,012. There is also allowance to use up to 10% of all funds (\$430,201 in 2016) for general administration and planning costs. IHDA will use said funds for this purpose, which also include affirmatively furthering fair housing activities. IHDA will not establish geographic set-asides, for the \$3,871,811 in 2016 Illinois/NHTF program funds, but will strive to achiev maximum geographic diversity in its final funding decisions.
Describe threshold factors and grant size limits.	Maximum Per Unit Development Subsidy Costs IHDA will use the same criteria for the National Housing Trust Fund that it uses under its HOME Program, which are HUD's 221(d)(3) limits. These limits will be based on total development cost, and are to be adjusted by geographic area and bedroom size.
What are the outcome measures expected as a result of the method of distribution?	IHDA will utilize the same performance measurements and outcomes criteria that it has used for the HOME Program (Multi-Family). These are included in the State's Five-Year Consolidated Plan – Strateg Plan and annual goals

Discussion

AP-35 Projects – (Optional)

Introduction

#	Project Name

Table 10 – Project Information

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

AP-38 Project Summary

Project Summary Information

Table 11 – Project Summary

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

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

Yes

Available Grant Amounts

The state has applied for a maximum of \$130,000,000 in Section 108 guaranteed loan funds which is approximately five times the amount of the State's FFY 2012 CDBG allocation. Maximum loan guarantee amount: \$20,000,000 per project. However, in the interests of limiting exposure and promoting a diversified portfolio, the Department reserves the right to limit the amounts pledged to any one unit of local government or business interest.

Recipients of prior CDBG funding that have outstanding audit or monitoring findings and/or other program exceptions which involve a violation of federal, state or local law or regulation, and/or that have failed to substantially meet their proposed accomplishments in their current CDBG projects are ineligible for 108 consideration.

Acceptance process of applications

In order to be eligible a project must meet all applicable CDBG requirements and result in significant employment and/or benefit for low and moderate income persons. Projects that are eligible for financing under existing federal, state, regional or local programs will generally not be considered for guarantee assistance unless the programs would fail to fully meet a project's need.

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

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

No

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

The State's Method of Distribution does not include a CRSA program at this time.

AP-50 Geographic Distribution – 91.320(f)

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

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

The State is also exploring opportunities to expend significant HOME funds in areas with identified concentrations of low-income and minority populations.

CDBG/Community Development Assistance Program grant fuding is only available to communities that are not direct Entitlements (receive their own direct CDBG allocation.

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

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

Due to the relatively small amount of the first year NHTF allocation, IHDA will not establish geographic set-asides, but strive to achieve maximum geographic diversity in its final funding decisions.

Geographic Distribution

Target Area	Percentage of Funds	
Statewide Distribution	100	

Table 12 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

The State has not established a policy of targeting its funds within already federally or State-defined eligible areas of the State to more specific jurisdictions or regions. If absolute need numbers were used to determine resource allocations of programs, areas with less densely populated communities (e.g.

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rural areas, small cities, suburban areas with comparatively lower numbers of low and very low-income households versus total households) would be discriminated against, as most of the assistance would then go to large urban centers exclusively. The State agencies administering Federal and State programs will continue to make concerted efforts to provide more outreach and technical assistance (e.g. workshops) to eligible applicants to ensure that information on affordable housing, economic development and public facilities programs is available on an equitable basis.

Discussion

The State of Illinois has established guidelines for all its programs, but has also worked hard to retain the flexibility needed for local governments, non-profits, and developers to apply for projects that meet local market needs. As such, the only major factor governing geographic distribution under each of IHDA's programs is the enabling law or statute for that program. The State does not target its funds by racial or ethnic group. Income is already a major targeting mechanism under almost all of IHDA's as well as HUD's programs. Under its LIHTC Program, however, IHDA does incentivize affordable rental housing applications from local opportunity areas.

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

Affordable Housing

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

Introduction

One Year Goals for the Number of Households to be Supported	
Homeless	1,075
Non-Homeless	157
Special-Needs	381
Total	1,613

Table 13 - One Year Goals for Affordable Housing by Support Requirement

One Year Goals for the Number of Households Supported Throu	
Rental Assistance	1,456
The Production of New Units	61
Rehab of Existing Units	96
Acquisition of Existing Units	0
Total	1,613

Table 14 - One Year Goals for Affordable Housing by Support Type

Discussion

Production of new units includes anticipated 45 units through HOME Multifamily.

Rehab of existing units includes anticipated 30 units through HOME Multifamily.

Production of new units includes anticipated 16 units through National Housing Trust Fund

Rehab of existing units includes anticipated 11 units through National Housing Trust Fund.

Rental assistance includes the ESG goal of 1,075 persons assisted through rapid rehousing.

Rehab of existing units includes anticipated 150 units through the CDBG Housing Rehabilitation Grant Program

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

Introduction

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

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

- * The Consolidated Plan-Action Plan and the Annual Performance Report documents are sent to all public housing authorities (PHAs) in Illinois. PHAs will remain part of the regular notification and distribution process for Consolidated Plan documents.
- * PHAs are also specifically sent an email inviting them to attend the public hearings on the Consolidated Plan.
- *Public housing inventory statistics were included in the Housing Market Analysis Section of the 2015-2019 Consolidated Plan.
- *IHDA took on the additional role of certifying the Consistency of PHA Agency Plans with the State Consolidated Plan (for all PHAs serving non-Entitlement areas which are not covered by a local Consolidated Plan). IHDA also keeps the Illinois Association of Housing Authorities (IAHA) and the Illinois Chapter of the National Association of Housing and Redevelopment Officials (NAHRO) informed of these new procedures by attending targeted meetings of these organizations to make presentations and answer questions about the process to/from PHA officials.
- *IHDA will benefit from reviewing the Agency Plans by obtaining information on PHA waiting lists These assist IHDA in both its future site and market studies and in future program planning. IHDA also works with a number of PHAs on converting Housing Choice Vouchers to Project-Based Assistance, especially under the Low Income Housing Tax Credit Program.

IHDA is also working with a number of PHAs on Rental Assistance Demonstration programs to convert public housing into Section 8 project-based housing units.

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

The State of Illinois does not own or operate any public housing as a State public housing authority. As such, it does not anticipate any major State involvement in this area, except to continue to provide related program information to interested parties through the IHDA/OHCS housing information clearinghouse and at related Illinois NAHRO and IAHA conferences, including housing authorities that may be establishing homeownership programs through their Agency Plans.

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

Per HUD PIH's determination, only one housing authority in Illinois, the Alexander County Housing Authority, is designated as troubled as of 3/4/2016. IHDA will provide outreach to troubled PHAs upon local request and will be available to meet with PHA officials to discuss areas where it may be able to provide technical assistance to assist in improving operations to remove this classification.

Other relevant State agencies, especially the Department of Commerce and Economic Opportunity and the Department of Human Services, will be invited to participate in a comprehensive team technical assistance effort as warranted. IHDA also may use the option to potentially invite other PHAs (e.g., high performers) and other technical assistance providers to reach the same goal of getting the "troubled" designation removed. All eligible financial resources and programs will be reviewed and evaluated as part of the overall technical assistance effort.

IHDA will continue to work with PHAs on an as-needed basis to help address their needs for accessing housing, technical, and financial assistance resources. Recent examples have included the following: assistance in referrals for obtaining local PHA market studies, supportive housing workshops, referrals to other funding sources for operations (e.g. Illinois Facilities Fund), State letters of support for HUD applications and similar efforts.

Discussion

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

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

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

HUD issued a final rule December 4, 2015, on the definition of "chronically homeless" to assist grantees focus their Continuum of Care homeless programs on persons with the longest histories of homelessness, who often also have the highest need.

Under the new final rule, chronically homeless means:

- (1) A "homeless individual with a disability," as defined in section 401(9) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11360(9)), who:
 - (i) Lives in a place not meant for human habitation, a safe haven, or in an emergency shelter; and
- (ii) Has been homeless and living as described in paragraph (1) (i) of this definition continuously for at least 12 months or on at least 4 separate occasions in the last 3 years, as long as the combined occasions equal at least 12 months and each break in homelessness separating the occasions included at least 7 consecutive nights of not living as described in paragraph (1)(i). Stays in institutional care facilities for fewer than 90 days will not constitute as a break in homelessness, but rather such stays are included in the 12-month total, as long as the individual was living or residing in a place not meant for human habitation, a safe haven, or an emergency shelter immediately before entering the institutional care facility;
- (2) An individual who has been residing in an institutional care facility, including a jail, substance abuse or mental health treatment facility, hospital, or other similar facility, for fewer than 90 days and met all of the criteria in paragraph (1) of this definition, before entering that facility; or
 - (3) A family with an adult head of household (or if there is no adult in the family, a minor head of

household) who meets all of the criteria in paragraph (1) or (2) of this definition, including a family whose composition has fluctuated while the head of household has been homeless.

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

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

As ESG grantees and State ESG subgrantees, Continuum of Care organizations conduct homeless outreach through their local jurisdictions and set their funding priorities based on the outcome. IDHS collects information from its providers in the annual ESG application.

Fourteen of the Continua of Care (CoCs) emphasized the value and importance of collaborating with other groups to educate and provide outreach for homeless services. These groups could include law enforcement, health care entities, mental health care providers, and housing organizations. Six CoCs explicitly reference street outreach programs. Four CoCs report using the HMIS system as a coordination and outreach strategy, as well as using a coordinated assessment and intake process. Other strategies at least one CoC each included in their descriptions include using their Point-in-Time (PIT) counts; conducting an annual street survey; focusing on street outreach for youth; visiting tent cities and other temporary, informal shelters; adopting the VI-SPADT program; providing a homeless crisis response system; having a referral hotline in the community; providing strategically placed outreach offices; and, conducting tailored serious mental illness outreach.

DoA's Colbert Consent Decree Parties have produced an implementation plan to help coordinate agency services and ease the transition process for Class Members. The Consent Decree and Nursing Home Deflection Program (if continued) work to prevent future people from entering the institutional system if it is unwanted. DoA has an average monthly caseload of 84,985 individuals. It's anticipated resources for FY 2016 are \$882,821,400.

Addressing the emergency shelter and transitional housing needs of homeless persons

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

Illinois Continua of Care (CoCs) are split between transitioning to and supporting Rapid Rehousing and Permanent Supportive Housing (PSH) programs and providing more emergency shelter and transitional housing. Eight CoCs mentioned their emergency shelters, some describing how the shelters are separated by demographic (men, women, families, youth, domestic violence, and veterans). Six CoCs stated they had transitional housing services. Five CoCs emphasized PSH programs, four discussed diversion programs, and three CoCs stressed rapid rehousing. Other strategies mentioned included

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making landlords aware of homeless prevention strategies; sending housing providers to training sessions whenever possible; providing life skill services; creating a planning committee; and providing emergency fund assistance.

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

Emergency solutions Grants aim to provide services to aid homeless persons. Services funded include: case management, childcare, education services, employment assistance and job training, outpatient health services, legal services, life skills training, mental health services, substance abuse treatment services, transportation, and services for special populations.

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

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

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

The majority of Illinois' Continua of Care (CoCs) provide services to homeless youth. Most of these services are focused around emergency shelter and transitional or temporary housing; however, some

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are working to provide permanent supportive housing (PSH) for youth. Eleven CoCs focus on PSH for the chronic homeless and nine focus on homeless veterans. At least a few CoCs provide emergency shelters, rapid rehousing, homeless prevention, transitional housing, and/or PSH for families. Other strategies to target certain populations include outreach for chronically homeless people; coordinated entry services for veterans; transportation to drop-in services for veterans; and, utility and deposit assistance for families and veterans.

DoA's Colbert Consent Decree Parties have produced an implementation plan to help coordinate agency services and ease the transition process for Class Members. The Consent Decree and Nursing Home Deflection Program (if continued) work to prevent future people from entering the institutional system if it is unwanted.

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

The Division of Mental Health recognizes the contributions of existing Supported and Supervised Residential program settings. As such, a strategic decision has been made to continue funding support to these program types. However, in State FY 2014 and forward, the Division of Mental Health will no longer support the creation nor expansion of any proposed new Supported or Supervised Residential program sites that do not meet all elements of the new DMH Permanent Supportive Housing model.

DASA works with the Interagency Council on Homelessness to end all forms of homelessness, using its resources and services whenever possible. DASA intends to continue its existing services in the best capacity possible with available funding. DASA does not have any discharge policies, as 80% of its clients use outpatient services.

Discussion

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

AP-70 HOPWA Goals - 91.320(k)(4)

One year goals for the number of households to be provided housing through the use of HOPWA for:		
Short-term rent, mortgage, and utility assistance to prevent homelessness of the individual or		
family	311	
Tenant-based rental assistance	10	
Units provided in permanent housing facilities developed, leased, or operated with HOPWA funds	0	
Units provided in transitional short-term housing facilities developed, leased, or operated with		
HOPWA funds	60	
Total	381	

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

Introduction

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

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

Actions Planned - These include the following: (1) Continued processing of Housing Affordability Impact Notes for all relevant State legislation proposed in the Illinois General Assembly; (2) The Illinois Housing Locator system continues to operate to allow landlords to list available rental properties to prospective renters. By December 31, 2015, 7,389 landlords had registered just under 106,211 units throughout the state. Between January 1, 2015 and December 31, 2015 there were 1,364,387 searches for affordable housing done using ILHousingSearch.org. IHDA hopes to expand the State agency partnerships over the next year to include additional participants (e.g., IDMH, IEMA, DCFS, IDOC, to name a few).

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

The State's Rental Housing Support Program helps about 1,200 Illinois families, each year, to afford safe and decent homes by funding rent subsidies to landlords throughout the state to make rental units affordable to households who earn less than 30% of the area median income. A major program goal is to use half of the funding for households who are at 15% of the area median income and below. Funding for the Rental Housing Support Program is provided from a \$10 fee from real estate document recordings that are expected to generate \$17 million annually, based upon collections in recent years. Tenants pay a flat rent of approximately 30% of their income and the local administering agency pays the balance of the rent negotiated with the landlord. Outreach efforts include additional targeting to households who have a member with a Special Need in an effort to the increase the likelihood of providing affordable housing for those households.

Affordable Housing Planning Appeals Act: IHDA, as the administering agency of the AHPAA, produces the non-exempt local communities list every five years. In December 2013, sixty-eight new non-exempt municipalities were identified. IHDA provides technical assistance to municipalities throughout the state

to complete and submit affordable housing plans. These efforts include an AHPAA handbook for local officials and administrators. <u>Accessibility:</u> Starting in 2015, IHDA has an "enhanced accountability" mandated requirement under its LIHTC Qualified Allocation Plan. All applicants must include at least 10% acceptable and 2% memory-impaired units in all projects. To encourage more widespread application, IHDA provides competitive points for utilizing Universal Housing Design (UHD) features.

Discussion

HUD's Homeless Continuum of Care funding has remained fairly steady. While the HEARTH Act requires 25% of funding to be used for permanent supportive housing development, this program isn't triggered until all renewal contracts/grant agreements are met, which has barely been the case since 2011. The Statewide Referral Network (SRN) has 154 developments representing over 1,040 affordable rental housing units for persons/households at 30% AMI or below and whom are either homeless/at risk or have disability. Improvements will continue to be made to this system, including integrating it with the HUD Section 811 Project and Assistance Program.

AP-85 Other Actions – 91.320(j)

Introduction

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

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

Actions planned to address obstacles to meeting underserved needs

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

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

The Qualified Action Plan (QAP) specifies how states will review, approve, and allocate federal Low Income Housing Tax Credits (LIHTCs). As the State's LIHTC allocating agency, IHDA coordinates the development of the annual Qualified Allocation Plan (QAP). Besides the program's already statutory targeting to households at 60% of area median income or below, IHDA has built a number of factors into its application scoring system to incentivize better targeting to lower-income households. These include the following point categories: Rental Assistance; Larger Units; Green Building (lower utility bills);

Rehabilitation (of existing housing); Community Revitalization Plans; 30% AMI Housing (10-15%); and Statewide Referral Network (SRN) units, which target 10-15% of a property's units to persons/households who are homeless/at-risk of homelessness or have a disability. All of these scoring criteria are aimed at incentivizing project applications which include deeper targeting to low- and moderate-income families.

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

The Department of Healthcare and Family Services currently operates this program through a Medicaid waiver which allows payment for services that are not routinely covered by Medicaid. These include personal care, homemaking, laundry, medication supervision, social activities, recreation and 24-hour staff to meet residents' scheduled and unscheduled needs. The resident is responsible for paying the cost of room and board at the facility. There are currently 143 supportive living facilities sites (11,575 units) located throughout Illinois.

Actions planned to foster and maintain affordable housing

HUD issued a proposed rule in the July of 2013 to revise and detail for the first time what its requirements are for HUD grantees, PHAs, and funding recipients to "affirmatively further fair housing", a certification signed annually by all HUD grantees. The proposed rule not only clarified what actions were considered acceptable, but also clarified when the old Analysis of Fair Housing Impediments (AFHI) was now due. Now to be known as the Fair Housing Assessment (FHA), it is to be tied to the Five-Year Consolidated Plan. PHAs for the first time are required to develop their own individual plans, or can become part of their jurisdiction's FHA. For the majority of PHAs, that would be the State's FHA, generally coordinated by IHDA. The new rule also discusses disparate impact, deconcentration of poverty, and opportunity areas, but states very little about persons with disabilities, a growing area of concern with the realm of fair housing issues. It is uncertain when HUD's final rule will be published.

However, IHDA has prepared for HUD's eventual publication of it and has made the following AFFH actions:

- 1. Establishment of Opportunity Areas,
- 2. Approved changes in the 2015 QAP to make it more responsive to State actions which "affirmatively further fair housing" (AFFH). This included:
- a. Reviewing concentrations of poverty and percentages of assisted housing (ARHI) in all areas to Annual Action Plan

2016

determine areas of concentration (part of Preliminary Project Assessment review);

- b. Expanding requirements for the content of community revitalization plans, especially those involving a project proposed in a Qualified Census Tract (QCT) to include economic revitalization efforts;
- c. Improving the Enhancing Accessibility point category to include language on IHDA's use of the ICC's Universal Housing Design standards as part of its building standards; (also mandating higher 10%/2% accessibility standard for all projects);
- d. Highlighting requirements to applicants for action steps in Affirmative Fair Housing Marketing Plans (AFHMPs) to evidence outreach efforts to reach "those groups most least likely to apply";
- e. Continuing to have the AHPAA Set-Aside, including updated lists of non-exempt as well as "at-risk" communities (i.e., those with 20% or less affordable housing share);
- f. Continuing the point category for a 10-20% set-aside for supportive housing populations, those being defined as persons with disabilities (a protected class) and/or homeless and at-risk persons and families;
- g. Requesting local government support, but eliminating any mandated documents. Use local approval, Consolidated Plan Consistency Certifications, and local HOME/CDBG funding as ways to positively reward applicants;
- h. Retaining income targeting;
- i. Retaining and expanding allowable sources of all federal and State rental assistance; and
- j. Establishing an allowable 3 percent Developer Fee for a Rental/Operating Reserve.

Actions planned to reduce lead-based paint hazards

Public Act 93-0789 established Illinois' Lead Safe Housing Advisory Council (LSHAC). Composed of advocacy groups, public health, state agency and industry representatives, the LSHAC has met since 2004. The work of the LSHAC includes both regulatory and legislative recommendations in the areas of screening and prevention, lead safe work practices, education, and funding for the remediation/rehabilitation of housing that contains lead poisoning hazards. The Lead Poisoning Prevention Act (Public Act 94-0879 establishes pre-emptive measures to prevent children from being lead-poisoned, including increased inspections of buildings suspected of containing lead hazards. The LPPA includes provisions barring owners of residential buildings who have willfully violated lead safety laws from doing business with the State of Illinois or any State agency until the violation is mitigated, along with increased fines and mandatory notice to tenants of possible lead hazards in their building. In response to recommendations in the LSHAC's report, Public Act 95-0492 was signed into law. The Act establishes a window replacement (CLEAR-WIN) program to prevent future cases of lead poisoning by assisting residential property owners in reducing lead-paint hazards through window replacement in pilot areas across the state. In CY 2011, the pilot-areas of the City of Peoria and the Englewood community in Chicago were chosen by the LSHAC for the first round of CLEAR-WIN funding. CLEAR-WIN has exhibited a lead dust reduction of more than 90% in the homes serviced. An evaluation of the CLEAR-WIN program conducted by the University of Illinois (UIC) at Chicago for HUD should be completed in 2016.

The Illinois Department of Public Health (IDPH) applied to the Centers for Disease Control and Prevention (CDC) to fund Lead Poisoning Prevention and Healthy Homes Activities throughout Illinois, and convened the Lead Poisoning Elimination Advisory Council (LPEAC). The LPEAC assisted IDPH in developing the State's Lead Program Healthy Homes Strategic Plan, to guide lead poisoning elimination initiatives and provide recommendations on enhancing participation from communities around the State. With the creation in IDPH of the Division of Environmental Health-Healthy Homes Program, the Department, along with the LPEAC, is drafting changes to its Healthy Homes Strategic Plan that reflect the State's on-going, multi-faceted approach to lead poisoning prevention and expanding Healthy Homes issues. In fiscal year 2014, the state of Illinois received \$420,284 in direct funds from the Centers for Disease Control and Prevention for lead poisoning prevention programmatic activities.

Effective January 1, 2015, significant changes strengthening the Illinois Lead Poisoning Prevention Act (LPPA) include classifying pregnant persons with an elevated blood lead level as subject to the same IDPH case management and environmental response as children, and clarification for the reporting of ALL blood-lead tests in Illinois, along with restrictions on which data can be disclosed. Also, the Department now has the ability to issue an Emergency Stop Work Order where the public health is in jeopardy as the result of improper work activities that disturb a lead bearing surface. Enforcement capabilities have expanded in cases where violations of the LPPA and the Lead Poisoning Prevention Code (LPPC) have occurred, with a penalty provision bringing Illinois in compliance with U.S. EPA requirements for all authorized State programs. The new language on lead reporting and lead work activities includes physicians/healthcare providers, laboratories, schools, daycare providers, owners of regulated facilities with an identified lead hazard and both licensed and unlicensed construction industry professionals.

Actions planned to reduce the number of poverty-level families

As has been the case in the past years, the State is utilizing the State's anti-poverty plan from its HHS funded Community Services Block Grant (CSBG) Program as the primary part of its anti-poverty strategy.

The purpose of the Community Services Block Grant program is to provide services and activities that will have a measurable and possible major impact on causes of poverty in a community or in areas where poverty is a particularly acute problem. In meeting this legislative purpose, the State of Illinois has as its objective the development of an effective anti-poverty program which encourages innovation, coordination, and specific program accomplishments in dealing with the problems of the poor. The Illinois Community Services Block Grant program is designed to accomplish the following goals:

- Development of comprehensive and coordinated anti-poverty programs which utilize all
 available resources to deal with the problems of communities' poor and disadvantaged citizens;
- Development of innovative programs designed to promote self-help activities that break the cycle of poverty and encourage self-sufficiency. Reflecting its position within the Department of Commerce and Economic Opportunity, the Illinois Community Services Block Grant program has

- as its highest priority programs which stimulate economic development and create jobs for low-income people, though affordable housing and homeownership are also important goals of the program; and
- Development of efficient management systems that reduce the administrative burden on individual programs and maximize the programmatic delivery of services to the poor.

Actions planned to develop institutional structure

The following actions are expected over the next 5 years:

- Regular meetings of the Illinois Housing Task Force, its Executive Committee, its Interagency Subcommittee, and related Working Groups to develop and implement the State's Annual Comprehensive Housing Plan.
- 1. Continued meetings of the OHCS Advisory Committee and State Agencies Housing Committee (quarterly), Lt. Governor's Rural Affairs Council (twice a year) and Rural Partners (as needed).
- Ongoing assessment of training and technical assistance needs, and the provision of follow-up assistance through program workshops and other identified methods (IHDA, IDHS, IDHR, other agencies).
- 1. More direct technical assistance on the formation and establishment of non-profit organizations to carry out affordable housing development in underserved areas.
- 1. Development of informational materials on all existing and revised Federal and State housing and support services programs via: possible updating of IHDA's Resource Guide to Federal and State Housing Programs in Illinois; dissemination of materials at various workshops and conferences; and dissemination of information on new federal and state programs, as they are created in Congress and/or the Illinois General Assembly and/or established or administered by State and local governments (e.g. the new Rental Housing Support Program).

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

The State activities to enhance coordination between public and assisted housing providers and private and government health, mental health, services, and fair housing agencies has historically been the role of the Illinois Housing Task Force (IHTF) and its Inter-agency Subcommittee.

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

1. IHDA has historically had a strong working relationship with private for-profit and non-profit affordable housing developers and owners, especially on the multi-family side. They are the

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major applicants under IHDA's loan, tax credit, and rental assistance programs, including HOME, LIHTC, and Affordable housing Trust Fund programs. IHDA works closely with this group's major membership organization, the Illinois Housing Council, to co-sponsor conferences and trainings, as well as sharing information with its members on new program developments, major revisions, regulatory updates, and the like, via regular newsletters, websites, and related communications.

- 2. IHDA works with DCEO to coordinate energy efficiency funding for both rehabilitation and new construction rental housing developments being otherwise assisted.
- 3. IHDA also has had a longstanding working relationship with participating lending institutions, local governments, and non-profit organizations under its homebuyer mortgage financing and down payment assistance programs. IHDA worked with these groups in 2014 to administer over \$1.2 billion in homebuyer loans in 2014, the vast majority of them to first-time homebuyers, as well as a special targeted program for veterans.
- 4. Both IHDA and DCEO work with local governments (and in IHDA's case also non-profit organizations) to administer local homeowner housing rehabilitation programs targeted to low/moderate –income households.
- 5. DCEO also works with local governments on funding and implementing local public works/infrastructure projects to address major health and safety concerns, especially of LMI households. It also works through local governments to fund needed economic development and related infrastructure projects for business expansions which create jobs for LMI persons.
- 6. IHDA has worked with homeless assistance agencies which frequently provide services to residents of permanent supportive housing projects which were funded in whole or in part with IHDA resources.

HDA works with IDHS, IDoA, and IDHFS on the State's long-term care rebalancing strategy, which includes accessing community-based housing and rental assistance for persons exiting institutional housing facilities, including the creation of permanent supportive housing, Statewide Referral Network (SRN) units, and administering both the HUD section 811 PBRA Program and the Rental Housing Support Program. In addition, IDHS-DMH administers the Bridge Rental Subsidy Program for qualifying persons with mental illness who are also leaving Institutional residential settings. Please see the Long Term Care Rebalancing chart for additional information on the related court consent decrees and implementation of them, as well as the State's Money Follows the Person Program. The 3 previously-referenced agencies generally provide the services funding to allow these persons to live in community-based housing.

Discussion

In additional to the items discussed udder "Actions planned to foster and maintain affordable housing" other proposed IHDA actions include:

- 1. Establishing a Limited English Proficiency (LEP) Policy and Implementation Plan;
- 2. Ongoing administration of the Affordable Housing Planning and Appeals Act (AHPAA) Program;

- Evaluation of IHDA's Home Modification Program, and research into including it as a disabilities/elderly-wide element of the CMMS Section 1115 Medicaid Waiver being coordinated by IDHFS;
- 4. Providing targeted training on Reasonable Accommodations policy and practice; and
- 5. Continue inclusion of the 30% preference for Special Needs Tenants under IHDA's Rental Housing Support Program (RHSP); and
- 6. Fund technical assistance to IHDA property managers on HUD's new Equal Access Rule for LGBT persons.
- 7. Supporting uncapped use of National Housing Trust Fund (NHTF) monies to be used for operating rental/assistance for housing for extremely low income households.

Proposed actions outside of IHDA include:

- Coordinate technical assistance with the Governor's Office to identify and work with Public Housing Authorities (PHAs) interested in participating in the remedial preferencing policy for persons with disabilities, which was approved by HUD (for Illinois PHAs);
- Provide ACS economic development market analysis and data to DCEO, and coordinate with DCEO's State ED Plan, to encourage economic revitalization in areas of high poverty/low-income /minority concentrations;
- Assist DCEO in establishing AFFH actions which can be carried out by units of general local government (UGLGs), the CDAP-eligible grantees, including passage and enforcement of fair housing ordinances;
- 4. Work with IDHS-DMH to continue implementation of the Bridge Rental Subsidy Program, a rental assistance program for persons with mental illness who are moving from institutions into community-based housing;
- 5. Develop ways to encourage use of the Property Tax Abatement Opportunity Act by PHAs and developers to encourage landlord participation in the HCV Program with rental properties in opportunity areas, through administering PHAs; and
- 6. Work with Metropolitan Planning Council (MPC) to better utilize its usage of opportunity areas for both the Regional Housing initiative (RHI) and CRHCI (vouchers) Programs.
- 7. Work with Illinois Department of Human Rights to provide training to PHAs on HUD's new Equal Access Rule and the State Human Rights Act protected classes under fair housing.

Program Specific Requirements

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

Introduction

Community Development Block Grant Program (CDBG) Reference 24 CFR 91.320(k)(1)

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

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

Other CDBG Requirements

1. The amount of urgent need activities

1,000,000

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

51.00%

HOME Investment Partnership Program (HOME) Reference 24 CFR 91.320(k)(2)

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

The Authority may invest HOME funds as equity investments, interest-bearing loans, non interest-bearing loans, interest subsidies consistent with the purposes of this part, deferred payment loans,

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grants, or other forms of assistance that HUD determines to be consistent with the purposes of this part.

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

The HOME regulations require that a house purchased with HOME funds must be kept affordable for an extended period of time through recapture provisions which have been determined by HUD to be appropriate. The period of affordability is based upon the HUD guidelines for amount of HOME funds per unit and is based on the amount of direct subsidy provided to the homebuyer. Direct subsidy is defined as the amount of assistance provided for down payment and closing costs for homebuyers receiving assistance in the homebuyer only program. For Homebuyers receiving funds for homebuyer with rehabilitation assistance, direct subsidy is the amount of assistance provided for down payment and closing costs plus the difference between fair market value before rehab and fair market value after rehab. See below for affordability provisions.

HOME FUNDS PROVIDED	AFFORDABILITY PERIOD
<\$15,000	5 Years
\$15,000-\$40,000	10 Years
>\$40,000	15 Years

3. A description of the guidelines for resale or recapture that ensures the affordability of units acquired with HOME funds? See 24 CFR 92.254(a)(4) are as follows:

For single-family programs funded with HOME funds IHDA uses a recapture/repayment approach in lieu of a resale approach. For IHDA multi-family, HOME funds are restricted to rental properties.

Recapture is triggered by sale or transfer and only direct subsidy to the buyer may be recaptured. The Authority has established loan restrictions which enable recapture of the HOME subsidy out of net proceeds. The HOME investment amount may be reduced pro rata based on the time the homeowner has owned and occupied the unit measured against the required affordability period. Net proceeds are defined as the sales price minus loan repayment of superior debt and closing costs. The recapture provisions will be included in a recorded recapture agreement for each unit assisted with HOME funds.

The owner occupied provision of assistance to the homeowner must remain in effect rhoughout the

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affordability period. The owner may not relocate and rent their property. Nor may they rent a portion of their property. Violation of the provision will trigger a recapture of all funds not gorgiven as of the date of the violation.

While IHDA multi-family HOME funds are restricted to rental properties, in the event that HUD has requested that the Lender return to HUD all or any portion of the proceeds of the HOME loan (the "Recapture") that have been disbured to or for the benefit of the Borrower, the Borrower shall provide such funds to satisfy the recapture as requested by the Lender, unless uch Recapture is due solely to the eactions of the Lender. The occurrence of any Default that has not been cured during any applicable grace or cure period shall give rise to a recapture.

The Borrower agrees to indemnify against and pay IHDA for any damages related to any Recapture that is due and owing. The borrower must also agree to full and prompt payment when due of the Recapture, plus all costs and expenses of collection and default interest as provided in the Financing Documents. The borrower also agrees to indemnify against and pay IHDA for any damages related to any Recapture that is due and owing.

4. Plans for using HOME funds to refinance existing debt secured by multifamily housing that is rehabilitated with HOME funds along with a description of the refinancing guidelines required that will be used under 24 CFR 92.206(b), are as follows:

Any proposed HOME refinance would be subject to IHDA's application process and Multifamily Underwriting Guidelines. Refer to IHDA's Multifamily Underwriting Guidelines. The relevant HOME application manuals, underwriting guidlines, and other publications describing the application criteria are found on the IHDA website

at: http://www.ihda.org/developer/forms.htm#referenceDocuments

Emergency Solutions Grant (ESG) Reference 24 CFR 91.320(k)(3)

1. Include written standards for providing ESG assistance (may include as attachment)

To collaborate with the Continuum of Care's (CoC's), applications will be sent annually to obtain CoCs funding recommendations. Applications from CoCs and sub recipients will be reviewed by ESG staff, determinations will be made and award letters will be distributed. Awards will be made based upon release of funds from HUD. All DHS grant terms are July 1st through June 30th. For complete written standards please refer to the IDHS website at http://www.dhs.state.il.us/page.aspx?item=77857

2. If the Continuum of Care has established centralized or coordinated assessment system that meets HUD requirements, describe that centralized or coordinated assessment system.

The State of Illinois is not a Continuum of Care organization. There are 20 CoC organizations within the State that address this issue independently.

3. Identify the process for making sub-awards and describe how the ESG allocation available to private nonprofit organizations (including community and faith-based organizations).

The Continuum of Care organizations provide a funding plan describing the performance measures and how those measures will be achieved. They also provide recommended funding by activity and agency within their CoC.

4. If the jurisdiction is unable to meet the homeless participation requirement in 24 CFR 576.405(a), the jurisdiction must specify its plan for reaching out to and consulting with homeless or formerly homeless individuals in considering policies and funding decisions regarding facilities and services funded under ESG.

The State of IL requires that all entities receiving ESG funds have a homeless or formerly homeless individual on their board or their policymaking entity.

5. Describe performance standards for evaluating ESG.

ESG Performance Standards

100% of all subrecipients of ESG Program funds:

- must ensure that all ESG funds are used in accordance with all federal program requirements at 24 CFR Part 576.
- must comply with DHS policies, reporting requirements, community service agreement obligations, department regulations, and deliverables in addition to all the ESG requirements in 24 CFR Part 576.

- are required to complete and submit accurate and timely annual Funding Applications that include but are not limited to providing staffing levels, program data, supportive service, and fiscal information in addition to submitting all requested attachments and certifications to DHS on or before the application deadline date
- will be limited to 60% of the agency's total fiscal year allocation for street outreach and emergency shelter activities as setforth in 24 CFR Part 576.
- must provide matching contributions from eligible sources in an amount equal to the amount of requested ESG Program funds from the subrecipient for all activities as prescribed in 24CFR Part 576. At a minimum, 50% of the match contributions must be cash
- must obtain written approval from DHS prior to subgranting any portion of ESG Program funds to any other entity to perform ESG eligible activities
- must obtain written agreements from all ESG subgrantees requiring the subgrantee to comply with all DHS policies and timelines, the provisions of the DHS community service agreement, and all program rules and regulations as set forth by DHS and 24 CFR Part 576, which is identical to the obligations of the ESG subrecipients.
- must provide DHS with accurate quarterly fiscal and service ESG reports on a quarterly basis.
- 100% of all ESG funded buildings or facilities (other than a privately owned residential structure) are required by ESG regulations to comply with the American Standard Specifications for Making Building and Facilities Accessible to, and Usable by, the Physically Handicapped", Number A-117.1P 1971, unless subject to the exceptions contained in 41 CFR 101-19.604.

HOPWA

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

Discussion

HOPWA

The co-administration of HOPWA and Ryan White funding by the Illinois Department of Public Health allows for better coordination in program planning, new program development, and fund allocation to various activities. The Department has worked with its Part B advisory group to ensure that funding

aligns to meet the needs of persons living with AIDS. The Part B Advisory group is constantly responding to meet rising needs. Though the primary focus of Part B funds addresses healthcare needs and related support services, these funds have also been used to address and supplement the housing needs of persons living with HIV/AIDS in the State of Illinois. Needs assessment activities are followed by priority setting and resource allocation. IDPH hosts mini-forums across the state for people living with HIV/AIDS and provider agencies to identify and address issues related to clients' needs. Topics include barriers to housing, homelessness, and emerging trends that impact people living with HIV/AIDS.

The Department requires the HIV Care Connect Lead Agents to develop annual work plans prior to receiving funds. The work plans must identify specific service and estimated number of person's that will be served by service category. The work plan will include descriptions of populations to be served, the care and service needs of the population and ways in which the HIV Care Connect Regions will ensure that the most in need will receive housing assistance. The State ultimately has the responsibility to ensure that grantees and project sponsors are caring out their programs in accordance with all applicable laws and relations.

The Department of Public Health works closely with each HIV Care Connect program and fiscal staff on a daily basis to ensure all obligations of the HOPWA program is met. IDPH monitors all programmatic and administrative expenditures through Provide which is a data management system. Activities and expenditures are entered in this data management system before reimbursements for services are approved.

The Department will consider faith-based or non-profit organization. Every three years the Department opens grant opportunities for grassroots faith-based and other community organizations. All grantees must submit 501C nonprofit status and prove that agencies are in good standing with the State of Illinois. All grantees must describe a statement of its capacity and performance history in providing services for people living with HIV/AIDS.

Attachments

Citizen Participation Comments

STATE OF ILLINOIS PUBLIC NOTICE

Public Hearing on the Draft State Consolidated Plan

Draft 2016 Action Plan

To obtain public input from Illinois residents and to comply with the United States Department of Housing and Urban Development (HUD) rules, which require the State to develop a Consolidated Plan, the Illinois Housing Development Authority (IHDA), in coordination with the Illinois Department of Commerce and Economic Opportunity (DCEO), the Illinois Department of Human Services (IDHS), and the Illinois Department of Public Health (IDPH), announces the availability of the draft 2016 Action Plan. This draft document will be available to the public electronically by Friday, May 27, 2016 and will also be available on request in limited hard copies by mail.

This draft plan covers those areas of the State that are not otherwise under the jurisdiction of a local Consolidated Plan. It includes summaries of the projected funding for the following formula grant programs: the Community Development Block Grant (CDBG); HOME Investment Partnerships; Emergency Solutions Grant (ESG); and Housing Opportunities for Persons with AIDS (HOPWA). In addition the 2016 Action Plan will include the program allocation plan for the first year of annual funding under the new National Housing Trust Fund (NHTF).

An electronic version will be available on IHDA's website, www.ihda.org. Electronic copies will also be available through the State Library network, as well as other local libraries located throughout the state.

The State will be holding one public hearing on Wednesday, June 22, 2016 at 10:00 A.M. It will be presented via televideo-conferencing at the following 3 locations: Illinois Housing Development Authority, 401 North Michigan Avenue-7th Floor, Chicago, Illinois; Department of Commerce and Economic Opportunity (DCEO)-4th Floor Conference Room, 500 East Monroe, Springfield; and the Illinois State Regional Office Building-Conference Suite 106, 2309 West Main Street, Marion. Persons are welcome to provide public comments prior to, at, or after the public hearing. Written comments are also welcomed for presentation at the public hearing or mailed directly to IHDA to ensure your comments receive a written response. All sites are fully accessible to persons with physical disabilities. Hearing-impaired and sight-impaired individuals in need of services such as an interpreter or documents in large-print/Braille are asked to make requests directly to IHDA at the telephone numbers below at least three (3) days before the public hearing. IHDA will make reasonable efforts to accommodate such requests. To obtain additional information concerning the public hearing, please call (312) 836-5262 or TDD/TTY (312) 836-5222. The State's public comments period begins on May 27, 2016, and all written Annual Action Plan

public comments must be <u>received</u> at IHDA by close of business on Monday, June 27, 2016. The State anticipates submitting the Action Plan to HUD by Thursday, June 30, 2016. For further information, contact:

Illinois Housing Development Authority

Office of Housing Coordination Services (OHCS)

Attention: Consolidated Plan

401 North Michigan Avenue, Suite 700

Chicago, Illinois 60611

312/836-5262

Dated: May 18, 2016

Public Comments Letters and Corresponding State Response

No public comments were received during the public comments period for the Draft 2016 Consolidated Plan-Annual Action Plan	

Grantee Unique Appendices

State of Illinois/Illinois Housing Development Authority (IHDA) Draft Allocation Plan for the National Housing Trust Fund

Per HUD's Interim Rule for the Housing Trust Fund (HTF) at 24 CFR Part 91, IHDA proposes the following:

I. Designation

Illinois Housing Development Authority (IHDA) has been designated by the Governor as the administering State agency for the newly-funded NHTF. Authorizing statute and HUD's interim rule place specific parameters on the eligible uses of these funds. Those requirements, along with IHDA's proposed uses, are as follows:

II. Method of Distribution

- A. First of all, State NHTF grantees are also allowed to provide direct funding to subgrantee local governments to operate their own local programs/projects, but are not required to do so. Given the relatively small size of the State's initial allocation the first year, the State does not intend to use subgrantees in the 2016 funding cycle.
- B. As the national funding level fell below \$1 Billion in 2016, 100% of program funds must be used to benefit Extremely Low-Income (ELI) households, defined as 30% of area median income or less.

States must use at least 80% of all funds (or 90% of program funds) for rental housing/renters. IHDA is allowed to use up to 10% of remaining program funds for homeownership assistance. IHDA will use 90% of all funds (100% of all program funds) for rental housing.

There is also an allowance to use up to 10% of all funds for general administration and planning costs. IHDA will use said funds for this purpose, which also include affirmatively furthering fair housing activities.

IHDA will use its Multi-Family "Common Application" as the major application format for NHTF rental housing projects, the same one used for the LIHTC and HOME programs, along with supplemental information required by program rules (see below). IHDA's process will include an initial completeness/eligibility scoring, review of mandatory requirements, underwriting, site and market review, peer review, internal Loan Committee and IHDA Board approval. A separate Request for Proposals (RFP) process will be used if needed to expedite obligation of program funds.

See IHDA's website (www.ihda.org) for additional information. There will be an open application process until all funds are committed.

III. Selection Criteria

Per CPD Notice 16-07, IHDA establishes the following:

A. Geographic Diversity

Given the relatively small size of the first-year HTF allocation, IHDA will not establish geographic setasides, but will strive to achieve maximum geographic diversity in its final funding decisions.

Annual Action Plan

B. Applicant Capacity

As part of IHDA's application process, each proposed project's development and management team will be reviewed to ensure that if the developer/owner has appropriate experience, capacity, and staffing to own, develop, and manage the project if approved for funding. This will include IHDA's past experience with team members, and review of HUD previous participation certificates where applicable. IHDA will also strongly encourage first-time developers to partner with an experienced non-profit or for-profit entity.

C. Project-Based Rental Assistance

IHDA will prioritize all rental projects which have committed or available federal, State, and local project-based rental assistance so that rents are affordable to ELI families. These may include: Section 8 Project-Based (preservation only); Project-Based Vouchers; Rental Housing Support Program; and Section 811 Project-Based Rental Assistance. It will utilize 30% of household income for rents and utilities as its standard.

D. Duration of Affordability Period

Applicants must document the extent to which proposed rents are affordable, especially to ELI households. All projects will be required to establish a minimum 30-year affordability period. This will work well particularly for LIHTC projects (extended use periods). Applicants are encouraged to establish longer affordability periods but must meet this minimum.

E. Priority Housing Needs of the State

These are defined on the State's Comprehensive Planning Act, and include ELI households, low-income seniors, low-income persons with disabilities, and homeless and at-risk homeless persons and families, as well as preservation and live-near-work projects. These are also the same priorities in the State's Five-year Consolidated Plan. Proposed projects must also fall under one of the state's Focus Areas in its annual plan, which are supportive housing, community revitalization, and economic development.

Projects will also be reviewed to evaluate their "readiness to proceed" in starting projects after funding approval, and then evaluating the applicant's ability to obligate funds in a timely manner.

In addition, IHDA proposes to prioritize the following types of projects:

- Permanent supportive housing, especially those creating new units.
- To maximize affordability, projects will be prioritized by which have little or no debt service.
- Assistance to cover the Statewide Referral Network units on LIHTC projects, which are targeted
 to persons with disabilities or homeless/at-risk AND with household income at 30% AMI or
 below.
- Public housing/Section 8 project-based conversions under the RAD Program, prioritizing those
 which are developing/redeveloping new housing units in opportunity areas or community
 revitalization areas, as defined by IHDA under its LIHTC Program.
- Finally, IHDA will also review how the applicant's project affirmatively furthers fair housing.

F. Leveraging

Projects which are able to commit other non-federal funds as part of their project financing will be given additional consideration- this would include other State-funded and locally funded programs, but not LIHTC, or State or local CDBG or HOME funding. The latter funds can be part of the project's financing, but will not be considered as non-federal funding. Please note that there is no State or local match requirements for NHTF, but IHDA anticipates most NHTF-funded projects will be highly leveraged.

G. Eligible Activities

Eligible Activities under the Illinois NHTF Program will include the following:

• Rental housing development (new construction or acquisition/rehabilitation) Eligible project costs included the following:

Real property acquisition; development hard costs; relocation; demolition; utility connections; site improvements; soft costs, including architectural, engineering costs, developer fees, and AFHMP marketing; refinancing in limited circumstances; paying construction loans; and staff project delivery costs.

- Operating/rental assistance is also an eligible activity, but is limited to a maximum of 33% of any year's State allocation, and must be fully utilized within 5 years of award. Such assistance can also be subsequently renewed, as long as it's within the 30-year affordability period. It is anticipated such assistance would be very limited and in the form of grants. Applicants must also present a long-term plan of utilizing permanent sources of State and federal rental assistance to be given consideration in this area.
- Public housing is only eligible under NHTF if the proposed project is part of HUD's Rental Assistance Demonstration (RAD) program, Choice Neighborhood Initiative Program, or involves the LIHTC Program. Priority will be given to projects creating new units.
- IHDA is not funding homeownership assistance under the program, at least in its first funding year.
- Eligible use of funds include: loans (low-interest, no-interest, balloon, forgivable, deferred payment), grants, interest rate subsides, equity investments, and other State-approved forms of assistance.

H. Eligible Recipients

Eligible recipients include for-profit and non-profit corporations, and governmental entities, including public housing authorities.

I. Performance Goals and Benchmarks

IHDA will utilize the same performance measurements and outcomes criteria that it has used for the HOME Program (Multi-Family). These are included in the State's Five-Year Consolidated Plan – Strategic Plan and annual goals.

J. <u>Maximum Per-Unit Development Subsidy Units</u>

The NHTF Allocation Plan also must include the State's policy on maximum per-unit subsidy, which is to be based on modest housing units with similar amenities and taking into account local market conditions. IHDA will use the same criteria that it uses under its HOME Program, which are HUD's 221(d)(3) limits. These limits will be based on total development cost, and are to be adjusted by geographic area and bedroom size.

K. Rehabilitation Standards

IHDA will use its Architectural Planning and Construction Standards to evaluate all rehabilitation work, which is updated annually. These are also used to evaluate Physical Needs Assessments (PNA's) for rehabilitation projects.

Post-occupancy, IHDA's Asset Management Services Dept. - will review the ongoing project needs with these standards, as well as HUD's Uniform Physical Condition Standards (UPCS), and HUD Housing Quality Standards (HQS) for smaller projects. It's noted that IHDA's standards address health and safety, major systems, accessibility; lead-based paint; and energy efficiency.

L. Resale and Recapture Provisions

Not Applicable; IHDA is not funding any first-time homebuyer assistance activities.

M. Affordable Homeownership Limits

Also Not Applicable; no funds will be used for homebuyer assistance.

N. <u>Limitation on Beneficiaries or Preferences</u>

Under IHDA's LIHTC Program, developers/owners are incentivized to set aside 10-15% of their housing units for supportive housing populations under the Statewide Referral Network (SRN). These are defined as persons with disabilities or homeless/at risk of homelessness AND @ 30% of AMI or below. This set-aside may be triggered if an NHTF project is also allocated LIHTCs as part of its project financing.

O. Refinancing Existing Debt

IHDA anticipates funding primarily new affordable housing development, and it will not give priority to such preservation projects which are primarily refinancing existing debt. If refinancing will only be permitted when:

- i. New investment is being made to create additional affordable units;
- ii. refinancing is necessary to reduce the overall housing cost and to make the housing more affordable, and is proportional to the number of HTF-assisted units in the rental project; and
- iii. the development cost attributable to the HTF units is greater than the amount of debt to be refinanced that is attributable to the HTF units.
- iv. The review of the management practices of the applicant must demonstrate that any proposed rehabilitation is not a result of disinvestment in the property.

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STATE CERTIFICATIONS

in accordance with the applicable statutes and the regulations governing the consolidated plan regulations, the State certifies that:

Affirmatively Further Feir Housing — The State will affirmatively further fair housing, which means it will conduct an analysis of impediments to fair housing choice within the state, take appropriate actions to overcome the effects of any impediments identified through that analysis, and maintain records reflecting that analysis and ections in this regard.

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, and implementing regulations at 49 CFR 24; and it has in effect and is following a residential anti-displacement and relocation assistance plan required under section 104(d) of the Housing and Community Development Act of 1974, as amended, in connection with any activity assisted with funding under the CDBG or HOME programs.

Anti-Lobbying - To the best of the State's knowledge and belief:

- 1. No Federal appropriated funds have been paid or will be paid, by or on behalf of it, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewel, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement;
- If any funds other then Federal approprieted 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-LLE, "Disclosure Form to Report Lobbying," in
 accordance with its instructions; and
- It will require that the language of paragraphs 1 and 2 of this certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and

contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly.

Authority of State — The submission of the consolidated plan is authorized under State law and the State possesses the legal authority to carry out the programs under the consolidated plan for which it is seeking funding, in accordance with applicable HUD regulations.

Consistency with plan - The housing activities to be undertaken with CDBG, HOME, ESG, and HOPWA funds are consistent with the stretagic plan.

Section 3 — It will comply with section 3 of the Housing and Urban Development Act of 1968, and implementing regulations at 24 CFR Part 135.

Andre & america	6/30/2016
Signature/Authorized Official	Deta
Executive Director, IMDA	

Specific CDSG Certifications

The State certifies that:

Citizen Participation — It is in full compilance and following a detailed citizen participation plan that satisfies the requirements of 24 CFR \$91.115 and each unit of general local government that receives assistance from the State is or will be following a detailed citizen participation plan that satisfies the requirements of 24 CFR \$570.486.

Consultation with Local Governments - It has or will comply with the following:

- It has consulted with affected units of local government in the nonentitlement area of the State
 in determining the method of distribution of funding:
- 2. It engages in or will engage in planning for community development activities:
- It provides or will provide technical assistance to units of local government in connection with community development programs; and
- 4. It will not refuse to distribute funds to any unit of general local government on the basis of the particular eligible activity selected by the unit of general local government to meet its community development needs, except that a State is not prevented from establishing priorities in distributing funding on the basis of the activities selected.

Local Meeds Identification — It will require each unit of general local government to be funded to identify its community development and housing needs, including the needs of low-income and moderate-income families, and the activities to be undertaken to meet these needs.

Community Development Plan — its consolidated housing and community development plan identifies community development and housing needs and specifies both short-term and long-term community development objectives that have been developed in accordance with the primary objectives of Title I of the Housing and Community Development Act of 1974, as amended. (See 24 CFR 570.2 and 24 CFR part 570)

Use of Funds -- It has compiled with the following criteria:

- 1. Maximum Feasible Priority. With respect to activities expected to be assisted with CDBG funds, it certifies that it has developed its Action Plan so as to give maximum feasible priority to activities which benefit low and moderate income families or aid in the prevention or elimination of slums or blight. The Action Plan may also include activities which the grantee certifies are designed to meet other community development needs having a particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community, and other financial resources are not available);
- 2. Overall Benefit, The aggregate use of CDBG funds including section 108 guaranteed loans during program year(s) 199., and. (a period specified by the grantee consisting of one, two, or three specific consecutive program years), shall principally benefit persons of low and moderate income in a manner that ensures that at least 70 percent of the amount is expended for activities that benefit such persons during the designated period;

 Special Assessments. The state will require units of general local government that receive CDBG funds to certify to the following:

it will not attempt to recover any capital costs of public improvements assisted with CDBG funds including Section 108 loan guaranteed funds by assessing any amount against properties owned and occupied by persons of low and moderate income, including any fee charged or assessment made as a condition of obtaining access to such public improvements.

However, if CDBG funds are used to pay the proportion of a fee or assessment that relates to the capital costs of public improvements (assisted in part with CDBG funds) financed from other revenue sources, an assessment or charge may be made against the property with respect to the public improvements financed by a source other than CDBG funds.

It will not attempt to recover any capital costs of public improvements assisted with CDBG funds, including Section 108, unless CDBG funds are used to pay the proportion of fee or assessment attributable to the capital costs of public improvements financed from other revenue sources, in this case, an assessment or charge may be made against the property with respect to the public improvements financed by a source other than CDBG funds. Also, in the case of properties owned and occupied by moderate-income (not low-income) families, an assessment or charge may be made against the property for public improvements financed by a source other than CDBG funds if the juriediction certifies that it lacks CDBG funds to cover the assessment.

Excessive Force — It will require units of general local government that receive CDBG funds to certify that they have adopted and are enforcing:

- A policy prohibiting the use of excessive force by law enforcement agencies within its jurisdiction against any individuals engaged in non-violent civil rights demonstrations; and
- A policy of enforcing applicable State and local laws against physically barving entrance to or exit from a facility or location which is the subject of such non-violant civil rights demonstrations within its jurisdiction;

Compilence With Anti-discrimination laws — The grant will be conducted and administered in conformity with title VI of the Civil Rights Act of 1964 (42 USC 2000d), the Feir Housing Act (42 USC 3601-3619), and implementing regulations.

Compilence with Laws - It will comply with applicable laws.

Sules Jamemore	6/30/2016
Signature/Authorized Official	Date
Executive Director, IHDA	1 W. See 8

Title

Specific HOME Cartifications

The State certifies that:

Tenant Based Rental Assistance - If it intends to provide tenant-based rantal assistance:

The use of HOME funds for tenent-besed rentel assistance is an essential element of the State's consolidated plan.

Eligible Activities and Costs — It is using and will use HOME funds for eligible activities and costs, as described in 24 CFR § 92.205 through §92.209 and that it is not using and will not use HOME funds for prohibited activities, as described in §92.21A.

Appropriate Financial Assistance — Before committing any funds to a project, the State or its recipients will evaluate the project in accordance with the guidelines that it adopts for this purpose and will not invest any more HOME funds in combination with other Federal assistance than is necessary to provide affordable housing:

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Executive Oirector, IHDA	

ESG Certifications

Each State that seeks funding under the Emergency Solutions Grants Program must provide the following certifications:

Mistching Punds – The State will obtain any matching amounts required under 24 CFR 576.201 in a menner so that its subrecipients that are least capable of providing matching amounts receive the benefit of the exception under 24 CFR 576.201(a)(2).

Discharge Pelicy – The State will establish and implement, to the maximum extent practicable and where appropriate, policies and protocols for the discharge of persons from publicly funded institutions or systems of care (such as health care facilities, mental health facilities, foster care or other youth facilities, or correction programs and institutions) in order to prevent this discharge from immediately resulting in homelessness for these persons.

Confidenticility – The State will develop and implement procedures to ensure the confidenticility of records pertaining to any individual provided family violence prevention or treatment services under any project essisted under the ESG program, including protection against the release of the address or location of any family violence shelter project, except with the written authorization of the person responsible for the operation of that shelter.

The State will ensure that its subrecipients comply with the following criteria:

Major rehabilitation/conversion — If an emergency shelter's rehabilitation costs exceed 75 percent of the value of the building before rehabilitation, the building will be maintained as a shelter for homeless individuals and families for a minimum of 10 years after the date the building is first occupied by a homeless individual or family after the completed rehabilitation. If the cost to convert a building into an emergency shelter exceeds 75 percent of the value of the building after conversion, the building will be maintained as a shelter for homeless individuals and families for a minimum of 10 years after the date the building is first occupied by a homeless individual or family after the completed conversion. In all other cases where ESG funds are used for renovation, the building will be maintained as a shelter for homeless individuals and families for a minimum of 3 years after the date the building is first occupied by a homeless individual or family after the completed renovation.

Emertial Services and Operating Costs – If ESG funds are used for shelter operations or essential services related to street outreach or emergency shelter, the subrecipient will provide services or shelter to homeless individuals and families for the period during which the ESG assistance is provided, without regard to a particular site or structure, so long the applicant serves the same type of persons (e.g., families with children, unaccompanied youth, veterans, disabled individuals, or victims of domestic violence) or persons in the same geographic area.

Renovation — Any renovation carried out with ESG assistance shall be sufficient to ensure that the building involved is safe and sanitary.

Supportive Services — The subrecipient will assist homeless individuals in obtaining permanent housing, appropriate supportive services (including medical and mental health treatment, counseling, supervision, and other services essential for achieving independent living), and other Federal State, local, and private assistance available for such individuals.

Herneless Persons Involvement – To the maximum extent practicable, the subrecipient will involve, through employment, volunteer services, or otherwise, homeless individuals and femilies in constructing, renovating, maintaining, and operating facilities, in providing services assisted under the ESG program, and in providing services for occupants of facilities assisted ESG.

Consolidated Plan - All activities the subrecipient undertakes with assistance under ESG are consistent with the State's current HUD-approved consolidated plan.

Judia & Jamerii	
Signature/Authorized Official	
Executive Director, IHDA	

HCPWA Certifications

The State HOPWA grantee certifies that:

Activities — Activities funded under the program will meet urgent needs that are not being met by available public and private sources.

Building — Any building or structure assisted under the program shall be operated for the purpose specified in the plan:

- For at least 10 years in the case of any building or structure purchased, leased, rehabilitated, renovated, or converted with HOPWA assistance.
- For at least 3 years in the case of assistance involving non-substantial rehabilitation or repair of a building or structure.

APPENDED TO CERTIFICATIONS

INSTRUCTIONS CONCERNING LOBBYING REQUIREMENTS:

A. Lobbying Certification

This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who falls to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure



STATE OF LLINOIS OPPICE OF THE GOVERNOR SPRINGFIELD \$2706

JIM EDCAR

DESIGNATION OF CONSOLIDATED PLAN AND HOME PROGRAM LEAD/ADMINISTRATIVE AGENCY AND SIGNATURE AUTHORITY

Effective as of the date of this designation and until further notice, I am authorizing the Director and/or Deputy Director of the Einois Housing Devalopment Authority (EIDA) to sign, on my behalf, all documents related to the HUD Consolidated Plan process and the HOME Program. I previously designated the Illinois Housing Development Authority as the State agency responsible for both the Comprehensive Housing Affordebility Strategy (CHAS) process and the administration of the HOME Program. HIDA shall also remain responsible for coordinating the drafting, development, others participation, and public distribution activities required to complete all other extenses necessary to comply with federal law, regulations, and guidelines on this metter. "All other impacted State agencies shall occuperate, with HDA in this regard, as well as share the cost of complying with these requirements on a pro-rated basis. This designation shall remain in effect until further written notice.

JIM EDGAR GOVERNOR STATE OF ILLINOIS June 15, 1994

DATE



OFFICE OF THE GOVERNOR

207 Store House Springrain, Illinois 62706

BRUCE RAUNER GOVERNOR

May 6, 2016

DESIGNATION OF ILLINOIS HOUSING DEVELOPMENT AUTHORITY AS HOME PROGRAM PARTICIPATING JURISDICTION

The federal HOME Investment Partnerships Program (the "HOME Program") provides formula grants to fund a wide range of activities in the State of Illinois (the "State") that build, buy, and rehabilitate affordable housing for rent or homeownership and provide direct rental assistance to low-income people. The Illinois Housing Development Authority (the "Authority") has been designated by my predecessors as the State participating jurisdiction's program administrator to coordinate the State's activities.

Effective as of the date of this designation and until further notice, I am designating the Authority to be the State (under the HOME Program definition of "State" in 24 CFR 92.2) and therefore to be the participating jurisdiction for HOME Program purposes. As a result of this designation, the Authority will take the place of the State as the participating jurisdiction for the State HOME Program, including all HOME Program funds previously swarded to the State participating jurisdiction not yet drawn.

The Authority will now have all the rights and responsibilities that come with the designation as the State participating jurisdiction under 24 CFR part 92, including the ability to directly receive HOME Program funds and responsibility for signing great agreements. All action regarding the State level HOME Program will now be undertaken by the Authority.

This designation shall remain in effect until further written notice.

Bruce Raune

Governor, State of Illinois