Executive Summary

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

1. Introduction

The U.S. Department of Housing and Urban Development (HUD) requires State and local grantees of the formula grant programs, namely the Community Development Block Grant (CDBG) the HOME Program, the Emergency Solutions Grants (ESG), the Housing Opportunities for Persons with AIDS (HOPWA) and the national Housing Trust Fund (HTF) programs to develop a five-year Consolidated Plan as a condition for funding. The State of Illinois' Consolidated Plan covers those non-entitlement areas of the State that do not have a local Consolidated Plan. 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.

The Office of Housing Coordination Services (OHCS) of the Strategic Planning and Reporting (SPAR) Division at IHDA 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 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. The Comprehensive Housing Planning Act (P.A. 94-965) of 2006 codified Executive Order 2003-18. The Comprehensive Housing Planning Act was renewed (as amended P.A. 99-0564) and extended to 2026 in legislation passed into law in 2016. The Executive Director of the Illinois Housing Development Authority (IHDA) is Chair of the State’s Housing Task Force, joined by a panel of forty-four representatives from State agencies and the housing community. The identification of the following eight priority populations provides 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)
• Low-income people residing in communities with ongoing community revitalization efforts
• Other special needs populations, including people with criminal records and veterans experiencing or at risk of homelessness.

Per the Act, the State of Illinois shall continue to prepare and be guided by an annual comprehensive housing plan addressing the housing needs of the underserved populations. Annual Comprehensive Housing Plans are to include an identification of funding sources for which the State has administrative control that are available for housing construction, rehabilitation, preservation, operating or rental subsidies, and supportive services.

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 August 30, 2017, HUD’s Office of Community Planning and Development in Chicago issued its 2016 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, overall, not making acceptable progress towards its 5-Year goals. The State budget impasse and the signing of the State’s Grant Agreements in November, 2016 had an impact overall on the State's 2016 program performance.
CDBG

- The State is meeting the 15-month goal to obligate 100 percent of its CDBG funds, and did not exceed the 3 percent cap on the CDBG funds for administrative and technical assistance costs.
- 2017 is the third year of the State's 2015, 2016, 2017 low/mod compliance period for its CDBG funds on projects and programs that would benefit low and moderate income people. As the 2017 allocation was not available until November, grants are currently in award phase. Compliance cannot be evaluated until entered into IDIS. A review of CDBG Activities contains 4 flags for the State's activities. The State is currently working on approved remediation plans for these flagged activities. One activity is waiting for completion of remediation activities, and two activities Pending-At-Risk, but Remediation Plans are not currently required for these two activities.

Evaluation of Past Performance continued: HOME, HTF, and NSP

HOME Investment Partnerships: During the 2016 Program Year, the State complied with the 24-month commitment deadline and the five-year expenditure deadline for HOME funds. In 2016, no HOME funds were subject to recapture. HUD noted a 2015 CHDO reservation shortfall of $1,673,515.95, stating that the funds would be de-obligated if not reserved by November 30, 2017. The Authority acknowledged the 24-month CHDO deadline for fund commitment, indicating it was delayed in accessing both Program Year 2015 funds and Program Year 2016 funds due to the two-year State budget impasse. The inability to commit and draw-down program funds affected CHDO reservations, as well as non-CHDO HOME funding.

The State reported Program Income receipt of $7,502,970.77 for the HOME program, with HUD noting that the Program Income reported in the 2016 Performance Evaluation Report (PER) did not match information in the Integrated Disbursement and Information System (IDIS). IHDA replied that for HOME Program Income reported in the 2016 PER, total Home Program Income received in Program Year 2016 was $7,502,970.77. However, this amount included additional receipts from Program Year 2015 for $2,804,673.35; therefore, actual HOME Program Year 2016 Program Income was $4,698,297.42. The Program Year 2015 receipts were not entered into IDIS in Program Year 2015 because, prior to the 2016 Participating Jurisdiction designation, the Authority was unable to requisition funds from the Illinois Department of Revenue (IDOR). IDOR served as the Authority's fiscal agent for purposes of the HOME funds. The State level appropriation was delayed due to the two-year State budget impasse. The total amount of HOME program Income drawn in Program Year 2016 was $2,110,166.15. This is broken down as follows; the Program Year 2016 Program Income payouts totaled $2,024,716.13. Two additional payouts used Program Year 2015 Income: $84,560.53 and $889.44. A report provided by HUD included two additional payouts to the amount of $896,231.46 and $399,954. These payouts occurred in Program Year 2017 but used 2016 Program Income. Therefore, these amounts could not be included in the $2,110,166.15 drawn amount for Program Year 2016.
For the national Housing Trust Fund, the State received $4,310,055 in HTF funds. IHDA’s Board awarded HTF funds to Pearl Street Apartment in the amount of $3,879,049 on May 19, 2017. The project had not had an initial closing and therefore was not shown as obligated in IDIS by the time of HUD’s review.

With respect to the HOME Open Activities Report, HUD identified 10 activities through IDIS (five open, and five in final draw) that had been in “open” status for an extended period without advancing to completion. By September 28, 2017, five activities had been completed in IDIS: 12343 (Admin); 13179 (Axley Place); 13208 (Diamond Sr. Apartments); 13225 (Fairhaven Crossing); and 13290 (Admin). Three others have had final draw and completion: Lincoln Village (13292); Garden House of River Oaks (13293), and Huntley Horizon (13303). The Landing at Belle Meadows (13212) and St. Elizabeth (13294) are still pending.

The State met both expenditure deadlines for Neighborhood Stabilization Program I and Neighborhood Stabilization Program III. The State will continue working with HUD as it draws any remaining funds for the LOCCS system and closes out its NSP grants.

**Evaluation of Past Performance continued: ESG, HOPWA, CDBG-DRGR**

- Regarding the Emergency Solution Grants, all 2016 ESG funds were obligated within the required 60-day period and the State met the requirement for making quarterly drawdowns. The State committed 7.42 percent of ESG funds for administrative activities, in compliance with HUD regulation. The State had $88,500.41 available to draw from 2015 ESG funds. The expenditure deadline for 2015 funds occurred November 4, 2017. Other than a de minimis account of pre-2015 funds, which HUD recaptured ($1), the State met this requirement and was on target to meet the deadline for 2015 ESG funds. The State committed 50.30% of its 2016 ESG allocation to Shelter and Street Outreach activities. HUD recognizes these needs through Illinois and encourages the State to consider investing more on these activities.

- The State HOPWA program was assessed during PY 2016 to determine compliance with the three-year expenditure deadline requirement. The State had expended 69.25% percent of the 2013 HOPWA grant and was not in compliance. To address the deficiency, the State is making a substantial amendment to the 2010-2014 Five-Year Consolidated Plan to use unexpended HOPWA funds for the necessary repair and rehabilitation, supportive services and STRMU of HIV/AIDS Housing Facilities and HIV Care Connect Lead Agents. This reflects a prior substantial amendment to the 2015-2019 Five Year Consolidated Plan that HUD approved on August 7, 2017.

- As of July 15, 2017, the State has just over $739,000 left to obligate for the IKE grants. $250,000 will be added to this amount as the State paid the first installment due resulting from the OIG monitoring and finding. The State is in the process of closing the Disaster Grant for Spring Flood under funding for Hurricane Sandy.

- The CDBG program was monitored on-site during the 2017 program year. No findings or concerns were issued and HUD has notified the State they do not intend to monitor onsite in
2018. One finding of non-compliance for 2013 regarding eligible use of Revolving Loan by Units of General Local Government was closed.

HUD has determined that the State of Illinois has the continuing capacity to administer Community Planning and Development programs, and the activities under CDBG, HOME, HOPWA, ESG and HTF were consistent with 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.

The Citizen Participation Plan centers around the public hearing and public comments processes. The State held one public hearing on Thursday, June 21, 2018 at 10:00 A.M. at the Illinois State Library, 300 South 2nd Street, Springfield Illinois. The Public Comment period began Tuesday May 29, 2018 and ended Thursday June 28, 2018. The Illinois Department of Public Health held its public comment period for a substantial amendment to the 2010-2014 Consolidated Plan concurrent with the public comments period for the draft 2018 Action plan, and held its public hearing in conjunction with the public hearing for the draft 2018 Action Plan. The HOPWA substantial amendment is attached to the end of this document.

- A 2018 Public Notice was e-mailed statewide to housing-related agencies and organizations, a number of which included announcement of same in a newsletter or mailing sent to their memberships. Copies were also sent to the members of the OHCS Advisory Committee and CDBG Entitlement Grantees.
- The Public Notice was published prior to these hearings in the following ten (10) newspapers: Belleville News Democrat; Breeze Courier; News-Gazette; Daily Southtown; Quincy Herald-Whig; Peoria Journal-Star; The Dispatch Argus; Rockford Registrar Star; Southern Illinoisan and the State Journal-Register.
- DCEO e-mailed notices of the public hearing to CDBG-eligible units of general local government in Illinois (i.e., non-entitlement cities, towns, villages, and counties).
- Hard copies of the draft Consolidated Plan 2018 Action Plan were made available to interested parties as requested. Electronic copies were sent to 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.
- The public hearing was held during the 30-day public comments period in Springfield. The date for the hearing, June 21, 2018, was also posted on IHDA’s web-site.
- The agenda for the public hearing is included below
• All notices clearly stated the 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.
• Notes from the public hearing are included in the plan
• One public comments letter was received during the public comments period. Response to this letter is included in the appendices to this document
• The development of both the Citizen Participation Plan and Consolidated Plan provided more than ample opportunity for the public to provide comments. As mentioned previously, all public hearing sites are fully accessible to persons with disabilities

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

Changes

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

(1) A major statutory change occurs in the enabling law which created the program that modifies the eligible types of applicants and/or the eligible types of activities which can be carried out, provided same were not at least partially eligible under the original statute and rules.

(2) Major changes in the use of the four formula grant funds from one eligible activity (as identified in the Consolidated Plan) over the original planned use.

(3) Other legislative or administrative actions that serve to significantly alter which agency(ies) are operating which existing, expanded, or new programs covered under the current (or potentially expanded) Consolidated Plan.

• In any of the above cases, this citizen participation plan will require that public notification occur per the following: written notification to IHDA Board of Directors, OHCS Advisory Committee, State Agencies Housing Committee, and 32 other housing-related organizations, to inform them of the proposed amendment and provide for a 30-day public comments period; and publication of press releases and public notices, and mailings, as is appropriate, to affected parties.

(4) The State shall consider all legitimate comments on the amendment, which are received in writing and orally at public hearings (if held) from the general public or units of general local government. A summary of those comments and the State responses to same will be attached to the substantial amendment, which the State will then forward to HUD for review and approval.
Public Hearing Agenda
Joint Public Hearing
For the State of Illinois’
State Consolidated Plan-Draft 2018 Action Plan/
and the HOPWA Substantial Amendment to the 2010 – 2014 Five-Year Plan
Thursday, June 21, 2018 @ 10:00 A.M.
Illinois Authors Room
Illinois State Library
300 South Second Street
Springfield, Illinois

Agenda
• Welcome and Introductions/Overview of Agenda – Office of Housing Coordination Services, Strategic Planning and Reporting (SPAR-OHCS) Illinois Housing Development Authority (IHDA)

• Historical Overview of the State Consolidated Plan; Citizen Participation Process; State Priorities – IHDA

• The Comprehensive Housing Plan Act (P.A. 94-965) and the Annual Comprehensive Housing Plan

• State’s Draft 2018 Action Plan and the Major HUD Formula Funding Programs:
• Community Development Block Grant (CDBG) and the Non-Housing Community Development Plan - Illinois Department of Commerce and Economic Opportunity (DCEO)

• HOME Investment Partnerships Program – Illinois Housing Development Authority (IHDA)

• National Housing Trust Fund (NHTF)-Illinois Housing Development Authority (IHDA)

• Emergency Solutions Grant (ESG) – Illinois Department of Human Services (IDHS)

• Housing Opportunities for Persons With AIDS (HOPWA) – Illinois Department of Public Health

• Housing Opportunities for Persons with AIDS (HOPWA)-Substantial Amendment (2010 -2014)

• Other Funding and Other Actions– IHDA

• Public Comments and Testimony/Question and Answer Period

• Adjournment
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 Tuesday, May 29, 2018 and ended Thursday June 28, 2018. The State held one public hearing on Thursday, June 21, at 2:30 P.M. in Springfield. The Public Comment period and the public hearing were concurrent with the Illinois Department of Public Health's substantial amendment to the previous, 2010-2014 Consolidated Plan. The HOPWA substantial amendment would allow for the activity-eligible use of pre-2015 HOPWA funding under the current, 2015-2019 Five Year Consolidated Plan, for Housing Facility rehabilitation. One public comment letter was received. The response is included in the appendices to this document.

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

Not applicable. One public comments letter was received during the public comments period. The response is included in the appendices to this documents. In addition to the public hearings for the Consolidated 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. An AC meeting was also held during the public comments period, in Springfield, on June 20, the day before the Public Hearing.
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 2018 Action Plan. This draft document will be available to the public electronically by Tuesday, May 29, 2018, 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 HUD formula grant programs: the Community Development Block Grant (CDBG); HOME Investment Partnerships; Emergency Solutions Grant (ESG); Housing Opportunities for Persons with AIDS (HOPWA); and the (National) Housing Trust Fund. 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 Thursday, June 21, 2018 in Springfield at 10:00 A.M. It will be held at the Illinois State Library, 300 South 2nd Street, Springfield. Confirm IHDA’s website, www.ihda.org. 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 Tuesday, May 29, 2018, and all written public comments must be received at IHDA by close of business on Thursday, June 28, 2018. For further information, contact:

Illinois Housing Development Authority  
Strategic Planning and Research Department  
Office of Housing Coordination Services (OHCS)  
Attention: Consolidated Plan  
111 E. Wacker Drive, Suite 1000  
Chicago, Illinois 60601  
312/836-5364

Dated: May 23, 2018
7. Summary

In addition to the public hearings, OHCS schedules regular 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 2018 were held on February 8, 2018 and June 20, 2018. Minutes of these regularly scheduled meetings are available upon request to the Strategic Planning and Reporting/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.

<table>
<thead>
<tr>
<th>Agency Role</th>
<th>Name</th>
<th>Department/Agency</th>
</tr>
</thead>
<tbody>
<tr>
<td>CDBG Administrator</td>
<td>ILLINOIS</td>
<td>IL Department of Commerce and Economic Opportunity</td>
</tr>
<tr>
<td>HOPWA Administrator</td>
<td>ILLINOIS</td>
<td>IL Department of Public Health</td>
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<tr>
<td>HOME Administrator</td>
<td>ILLINOIS</td>
<td>IL Housing Development Authority</td>
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<tr>
<td>ESG Administrator</td>
<td>ILLINOIS</td>
<td>IL Department of Human Services</td>
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<tr>
<td>HTF Administrator</td>
<td>ILLINOIS</td>
<td>IL Housing Development Authority</td>
</tr>
</tbody>
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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) of 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 five major HUD formula funding programs. These formula grants are administered by the four different State agencies as included in the chart above.

Governor Pat Quinn designated the Illinois Housing Development Authority as the administering State agency for the National Housing Trust Fund. The third year of national HTF funding will occur in the fourth (2018) year of the Five Year Consolidated Plan.
Consolidated Plan Public Contact Information

Illinois Department of Commerce and Economic Opportunity (CDBG)
500 E. Monroe
Springfield, Illinois 62701
Contact: David Wortman
Ph: 217/558-4200 Fax: 217/558-4107
Alternate: Wendy Bell

Illinois Housing Development Authority (HOME and National Housing Trust Fund)
111 E. Wacker Drive
Suite 1000
Chicago, IL 60601
Contact: Burton Hughes
Ph: 312/836-5320 Fax: 312/832-2191
Alternate: Melinda Koenig

Illinois Department of Human Services (ESG)
823 E. Monroe
Springfield, IL 62702
Contact: Lila Robinson
Ph: 217/524-5859
Alternate: Eva Sanchez-Jones

Illinois Department of Public Health (HOPWA)
Contact (Division of Infectious Diseases, HIV/AIDS Section):
Deborah Grant
Ph: 217/785-5260 Fax: 217/524-6090
35 W. Jefferson
Springfield, IL 62761
Alternate: Jeffrey Maras

Contact (Division of Environmental Health):
Kert McAfee
Ph: 217/557-4519 Fax: 217/725-6112
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/SPAR. 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.

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) 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>
<thead>
<tr>
<th></th>
<th>Agency/Group/Organization</th>
<th>Alliance to End Homelessness in Suburban Cook County</th>
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<tbody>
<tr>
<td></td>
<td><strong>Agency/Group/Organization Type</strong></td>
<td>Housing Services - Housing Services-Victims of Domestic Violence Services-homeless Regional organization</td>
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<tr>
<td></td>
<td><strong>What section of the Plan was addressed by Consultation?</strong></td>
<td>Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy</td>
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<tr>
<td></td>
<td><strong>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</strong></td>
<td>Helped refine the Illinois Continua-wide request for information for the homeless needs assessment</td>
</tr>
<tr>
<td>1</td>
<td>Agency/Group/Organization</td>
<td>Corporation for Supportive Housing</td>
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<tr>
<td></td>
<td><strong>Agency/Group/Organization Type</strong></td>
<td>Housing Services - Housing Services-Persons with Disabilities Services-homeless</td>
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<tr>
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<td><strong>What section of the Plan was addressed by Consultation?</strong></td>
<td>Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Non-Homeless Special Needs</td>
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<td></td>
<td><strong>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</strong></td>
<td>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</td>
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<td>Agency/Group/Organization</td>
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<td>Agency/Group/Organization Type</td>
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<td>Regional organization</td>
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<td>What section of the Plan was addressed by Consultation?</td>
<td>Non-Homeless Special Needs</td>
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<td>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</td>
<td>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</td>
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<tr>
<th>4</th>
<th>Agency/Group/Organization</th>
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<tr>
<td></td>
<td>Agency/Group/Organization Type</td>
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<td>Business Leaders</td>
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<td>What section of the Plan was addressed by Consultation?</td>
<td>Non-Homeless Special Needs</td>
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<td></td>
<td>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</td>
<td>Development Services Group is a private consulting firm that has experience with business, financing, and economic/housing development programs</td>
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<tr>
<th>5</th>
<th>Agency/Group/Organization</th>
<th>IFF (formerly Illinois Facilities Fund)</th>
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<tr>
<td></td>
<td>Agency/Group/Organization Type</td>
<td>Housing</td>
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<tr>
<td></td>
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<td>Regional organization</td>
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<td></td>
<td></td>
<td>Private Sector Banking / Financing</td>
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<td></td>
<td>What section of the Plan was addressed by Consultation?</td>
<td>Non-Homeless Special Needs</td>
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<td></td>
<td>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</td>
<td>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. Under HOME First IFF acquires, develops and owns integrated housing that remains permanently affordable to very low-income persons with disabilities</td>
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<td>6</td>
<td><strong>Agency/Group/Organization</strong></td>
<td>Illinois Manufactured Housing Association</td>
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<tr>
<td><strong>Agency/Group/Organization Type</strong></td>
<td>Housing Business Leaders</td>
<td></td>
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<tr>
<td><strong>What section of the Plan was addressed by Consultation?</strong></td>
<td>Housing Need Assessment</td>
<td></td>
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<tr>
<td><strong>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</strong></td>
<td>Member of the OHCS Advisory Committee: IMHA serves as a trade organization for the manufactured housing industry, representing manufacturers, retailers, suppliers and rental community owners</td>
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<tr>
<th>7</th>
<th><strong>Agency/Group/Organization</strong></th>
<th>Illinois Mental Health Planning and Advisory Council</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Agency/Group/Organization Type</strong></td>
<td>Services-Children Services-Elderly Persons Services-Persons with Disabilities</td>
<td></td>
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<tr>
<td><strong>What section of the Plan was addressed by Consultation?</strong></td>
<td>Non-Homeless Special Needs</td>
<td></td>
</tr>
<tr>
<td><strong>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</strong></td>
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<th>8</th>
<th><strong>Agency/Group/Organization</strong></th>
<th>RANTOUL</th>
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<tbody>
<tr>
<td><strong>Agency/Group/Organization Type</strong></td>
<td>Housing Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Health Services-Education Service-Fair Housing Other government - Local</td>
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<tr>
<td><strong>What section of the Plan was addressed by Consultation?</strong></td>
<td>Economic Development</td>
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<tr>
<td><strong>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</strong></td>
<td>A CDBG local Entitlement Community and member of the OHCS Advisory Committee, represented by the Village of Rantoul Community Development Director</td>
<td></td>
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<tr>
<td></td>
<td>Agency/Group/Organization</td>
<td>WABASH AREA DEVELOPMENT, INC.</td>
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</tbody>
</table>
|   | 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 consulted. What are the anticipated outcomes of the consultation or areas for improved coordination? | WADI is a community action agency and a member of the OHCS Advisory Committee |

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<tr>
<th>10</th>
<th>Agency/Group/Organization</th>
<th>Illinois Department of Public Health</th>
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</table>
|    | Agency/Group/Organization Type | Housing  
Services-Children  
Services-Persons with Disabilities  
Services-Persons with HIV/AIDS  
Services-Health  
Health Agency  
Publicly Funded Institution/System of Care  
Other government - State |
|    | What section of the Plan was addressed by Consultation? | HOPWA Strategy  
Lead-based Paint Strategy |
<p>|    | 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 State Agencies Housing Committee and administrator of the Housing Opportunities for Persons with AIDS (HOPWA) program, one of the four formula grant programs, which enables IDPH to promote housing and health stability for low-income people living with HIV/AIDS in Illinois. IDPH also administers the State's Lead Poisoning Prevention and Healthy Homes Programs through the Office of Environmental Health. IDPH enforces the Lead Poisoning Prevention Act, and the Lead Poisoning Prevention Code. IHDA serves on both the Lead Safe Housing Advisory Council and the Lead Poisoning Elimination Advisory Council, both administered by IDPH |</p>
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<th>11</th>
<th>Agency/Group/Organization</th>
<th>Lt. Governor’s Rural Affairs Council</th>
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</table>
|    | Agency/Group/Organization Type | Services-Health  
|    |                                | Services-Education  
|    |                                | Services-Employment  
|    |                                | Other government - Local  
|    |                                | Regional organization  |
|    | What section of the Plan was addressed by Consultation? | Economic Development  |
|    | Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination? | IHDA Staff attend Quarterly Meeting of the LG Rural Affairs Council  |

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<tr>
<th>12</th>
<th>Agency/Group/Organization</th>
<th>Illinois Council on Developmental Disabilities</th>
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</table>
|    | Agency/Group/Organization Type | Services-Persons with Disabilities  
|    |                                | Other government - State  
|    |                                | Planning 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? |  |

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<tr>
<th>13</th>
<th>Agency/Group/Organization</th>
<th>Illinois Emergency Management Agency</th>
</tr>
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</table>
|    | Agency/Group/Organization Type | Housing  
|    |                                | Other government - State  
|    |                                | Planning organization  |
|    | What section of the Plan was addressed by Consultation? | Disaster Response  |
|    | Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination? | Member of the State of Illinois Housing Task Force. IEMA Staffs the Ad Hoc Disaster Recovery Working Group (AHDRG) through the ACHP Housing Task Force. Membership of the AHDRG include IHDA staff  |
14 | Agency/Group/Organization | Partnership for a Connected Illinois - Broadband Illinois |
---|---|---|
Agency/Group/Organization Type | Planning organization |
What section of the Plan was addressed by Consultation? | Statewide Broadband/Tele-health |
Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination? | The Partnership for a Connected Illinois is a 501(c)(3) non-profit organization based in Springfield, Illinois. Its missions are to ensure broadband access throughout the State of Illinois, and maximize broadband impact and use. |

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


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

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<th>How do the goals of your Strategic Plan overlap with the goals of each plan?</th>
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<tr>
<td>Continuum of Care</td>
<td>Regional Continuums of Care</td>
<td>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 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).</td>
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</table>
On January 5, 2018, HUD extended the deadline for submission of an Assessment of Fair Housing (AFH) by local government program participants until the next Five-Year Plan due after October 31, 2020. In addition, HUD has not issued the AFH Assessment tool for states. As such, states are not currently required to submit an AFH, but must continue to comply with existing obligations to affirmatively further fair housing. Until the State is required to submit an AFH, it will continue to provide its AFFH Consolidated Plan Certification, and continue to report on the State's actions to address fair housing impediments in the State's Consolidated Plan Annual Performance reports, in compliance with CFR 24 91.520(a). Below is the State's summary of its planned actions to address Fair Housing Impediments.

1. Gaps in geographic coverage of non-profit fair housing agencies-Eight non-profit fair housing agencies were awarded eleven grants on January 23, 2018 (for FFY 2017) under HUD's Fair Housing Private Enforcement Initiative grants and Education and Outreach Initiative grants. While most were located in the Chicago metro area, one (Prairie State Legal Services) serves a large downstate geographic. In addition, the Metro St. Louis EHOC was funded, which also works in the Illinois part of that metro area. HUD issued an FFY 2017 NOFA for these programs in August of 2017, with applications due on October of 2017. The NOFA for FFY 2018 funding has not yet been issued.-The Illinois Department of Human Rights (IDHR), through its Fair Housing Division, provides statewide coverage, including those areas not directly serviced by a HUD Fair Housing Initiatives Program, and has offices/staff in Chicago, Springfield, and Marion. Besides processing fair housing complaints as a HUD-designated substantially equivalent agency, it also conducts presentations and training for government agencies and community-based groups regarding fair housing rights under the Illinois Human Rights Act.-IDHR and IHDA also shared fair housing information for wider circulation to other major membership organizations, including Housing Action Illinois (HAI), Supportive Housing Providers Association (SHPA),
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<td>Illinois Housing Council (IHC), Rural Partners, Chicago Area Fair Housing Alliance (CAFHA), and other organizations.</td>
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<td>2. Lack of Fair Housing Knowledge-IDHR, through its Institute for Training and Development, regularly provides a schedule of related training, including &quot;Basic Fair Housing Training for Landlords &amp; Property Managers&quot;, LGBTQ-Equal Access Requirements, and Reasonable Accommodations Policies.- Sessions on fair housing-related topics are included in statewide conferences, including the Illinois NAHRO annual conference, Illinois Association of Housing Authorities (IAHA), Housing Action Illinois (HAI), Supportive Housing Providers Association (SHPA), Rural Partners/Illinois Institute for Rural Affairs, and others.-Illinois Realtor (fka the Illinois Association of Realtors) works jointly with IDHR on a fair housing program to publicize passage of the Fair Housing Act.</td>
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<tr>
<td>AFH 2 - Action to overcome impediments</td>
<td>State Government</td>
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<td>3. Shortage of affordable, accessible, and suitable housing - IHDA actively pursues or develops funding and assistance options for affordable housing that serve a variety of special needs populations, including: the HUD Section 811 Project-Based Rental Assistance Demonstration; the Home Accessibility Program; the Rental Housing Support Program; Treasury’s Hardest Hit Fund; and first mortgage financing programs. IHDA administers combined funding for its Permanent Supportive Housing Development Program, to better target special needs populations that also need services. This includes the national Housing Trust Fund. IHDA continues to develop and improve its Low Income Housing Tax Credit (LIHTC) Program to better serve lower-income households. Features include: enhanced accessibility (requiring twice the number of federally-required accessible housing units); Universal Design; Opportunity Areas; Community Revitalization efforts; scoring for income targeting, rental assistance, and energy conservation/green building; providing preference points to projects proposed in AHPAA communities (a State law identifying localities with less than 10% affordable housing stock); prioritizing projects that serve supportive housing populations via participation in the inter-agency Statewide Referral Network (SRN); and other areas. IHDA continues to assist Supportive Living Facilities, the state’s assisted living program for elderly and persons with disabilities (via a Medicaid-approved waiver). IHDA continues coordination with IDHS and IDoA in coordinating assistance with its Bridge Rental Subsidy Program, designed to assist class members of ADA-related court consent decrees. IHDA continues to coordinate with IDHS and local participating housing authorities which provided matching public housing and HCV units to persons with disabilities (as part of its Section 811 program). Continues to address lead-based paint and water issues with IDPH, IEPA, IHDA, and DCEO. Continues to operate the Illinois housing search website through a third party vendor, providing real-time information on available statewide affordable housing units, monitoring for fair housing violations, and enhanced matching capability for State Referral Network (SRN) and 811 units, including those with accessible features.</td>
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<td>AFH 3 - Actions to Overcome Impediments</td>
<td>State Government</td>
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| 4. Improving lending and real estate practices-The Illinois Department of Financial and Professional Regulation(IDFPR) continues to regulate and monitor State-chartered banks and financial institutions, concentrating on mortgage fraud and predatory lending-The Illinois Attorney General's Office continues to engage in litigation regarding mortgage fraud and predatory lending, and continues to administer the DOJ Mortgage Foreclosure Settlement Program-IHDA continues to provide lender training to participating banks/financial institutions which participate in its homebuyer mortgage and down payment assistance programs, which continue to include a fair housing/non-discrimination component-In 2017 the Illinois General Assembly passed the Installment Sales Contract Act, a law providing key consumer protections to homeowners involved in predatory rent-to-own contracts, also known as a contract-for-deed mortgages. This benefits lower income households where a sub-prime loan is their only viable homeownership option-IHDA continues to provide credit and foreclosure prevention counseling through local agencies under its Hardest Hit Fund and Foreclosure Prevention Program, both aimed at assisting homeowners in avoiding foreclosure-IHDA continues to administer its emergency mortgage assistance program, a down payment assistance program, and a refinancing program for homeowners with underwater mortgages-Illinois Realtor has established a fair housing promotion and training section on its website, in conjunction with IDHR, to promote/commemorate the passage of the Fair Housing Act-IHDA continued to have lender, real estate, and developer representatives on its SPAR/OHCS Advisory Committee, the State's official advisory group for the HUD-required State Consolidated Plan5. Improving Enforcement-IHDA continues to include fair housing provisions in its loan and tax credit documents for approved multi-family rental housing projects. It also holds on-going training for property managers, which includes a fair housing compliance section. Specific training is done on reasonable accommodations, especially regarding persons with disabilities-IHDA also provides highlights to applicants and approved owners/developers/property managers on action steps for the Affirmative Fair Housing Marketing Plans (AFHMPs) to
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<tr>
<td>AFH 4 - Actions to Overcome Impediments</td>
<td>State Government</td>
<td>better evidence efforts to provide outreach efforts to reach those groups least likely to apply for affordable housing- IHDA also provides fair housing training to participating lenders under its homebuyer assistance programs (See Education section above)-The Illinois Department of Commerce and Economic Opportunity (DCEO) provides similar fair housing training to its CDBG local government grantees at its annual grantee administrator training, and continues providing technical assistance as needed on fair housing issues, as requested or informedIHDA continues efforts to promote projects in opportunity areas as well as community revitalization areas. With the latter, this included reviews of existing affordable housing inventory to reduce geographic concentration, and promotion of more comprehensive economic/community development in these areas.</td>
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<td>6. Lack of funding to address needs-This issue was discussed previously under Impediment #3 regarding the State's efforts to develop new program resources and pursue available funding opportunities-Most HUD programs have experienced major funding reductions in recent years. The recent approval by Congress and the President of the FFY 2018 appropriations bill at least temporarily reversed this trend, providing increased funding for many HUD programs, including CDBG, HOME, Emergency Solutions, HOPWA, public housing, rental assistance programs, Section 811, Section 202, and many others. This will allow State and local grantees to temporarily address the backlog and pipeline of needed affordable housing projects. IHDA continues to pursue other available funding and develop new programs to address the ever-growing affordable housing needs of the State's communities, and may apply to be designated a Community Development Financial Institution (CDFI) and/or non-profit under Treasury's Capitol Magnet Fund</td>
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</table>
| 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 its 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 circuit court, in which case the Illinois Attorney General's Office represent the matter. Proposed Fair Housing Outreach Activities: IDHR will continue its education and outreach efforts to disseminate information about Illinois residents fair housing rights and 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 working with 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

Affirmatively Further Fair Housing (AFFH) | Affirmatively Further Fair Housing (AFFH)
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<td>to the International Association for Official Human Rights Agencies</td>
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<tr>
<td>AFFH (2)</td>
<td>IHDA (with IDHR)</td>
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| 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 promote 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 determine 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 Allocation Plan for LIHTCs, projects must comply with all applicable federal and State accessibility laws to receive credits. Additional project scoring points are provided for developments that provide enhanced accessibility standards. For single-family programs, 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 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...
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<td>AFFH (3)</td>
<td>DCEO (with IDHR)</td>
<td>IHDA provides a preference to LAA applicants which target up to 30% of their requested assistance to &quot;Special Needs Tenant&quot;.</td>
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<td>AFFH (4)</td>
<td>Dept of Financial and Professional Regulations (with IDHR)</td>
<td>DCEO administers one 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 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 CDBG Housing Rehabilitation Grants component.</td>
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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 Professionals, including real estate brokers, salespersons, and appraisers. The Division works with the other divisions to investigate claims of discriminatory real estate practices. Also the Division's computer system audits every real estate licensee's continuing education course work to ensure compliance with the continuing education requirements.
The Illinois Department of Insurance conducts both regulatory and consumer protection activities. In keeping with an open competition regulatory philosophy, its 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.
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<td>AFFH (6)</td>
<td>Illinois Council on Developmental Disabilities (with IDHR)</td>
<td>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 - &quot;the DD Act&quot;). 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</td>
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<td>Name of Plan</td>
<td>Lead Organization</td>
<td>How do the goals of your Strategic Plan overlap with the goals of each plan?</td>
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<td>AFFH (7)</td>
<td>Office of the Attorney General (with IDHR)</td>
<td>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 (&quot;Code&quot;) and may include the filing of a lawsuit where necessary to ensure compliance with the EBA. The EBA and Code apply to the construction and alteration of public facilities and qualifying multi-story housing units. For purposes of housing discrimination, the Attorney General has jurisdiction over multi-story housing which is defined as &quot;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&quot;. 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 (&quot;CEREA&quot;). CEREA (15 ILCS 210) gives the Attorney General 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 throughout Illinois concerning their rights under the HRA.</td>
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<td>Name of Plan</td>
<td>Lead Organization</td>
<td>How do the goals of your Strategic Plan overlap with the goals of each plan?</td>
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<td>Homeless Prevention: Discharge Coordination Policy</td>
<td>Various State Agencies</td>
<td>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</td>
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<td>Discharge Policy (2)</td>
<td>Various State Agencies</td>
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</table>
| 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 more effectively prepare for the best appropriate programming upon returning to the 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
<table>
<thead>
<tr>
<th>Name of Plan</th>
<th>Lead Organization</th>
<th>How do the goals of your Strategic Plan overlap with the goals of each plan?</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>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</td>
</tr>
<tr>
<td>Discharge Policy (3)</td>
<td>Various State Agencies</td>
<td></td>
</tr>
<tr>
<td>---------------------</td>
<td>------------------------</td>
<td></td>
</tr>
</tbody>
</table>

IDOC has incorporated the use of www.RentryIllinois.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 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
Table 3 - Other local / regional / federal planning efforts

<table>
<thead>
<tr>
<th>Name of Plan</th>
<th>Lead Organization</th>
<th>How do the goals of your Strategic Plan overlap with the goals of each plan?</th>
</tr>
</thead>
<tbody>
<tr>
<td>Narrowing Digital Divide</td>
<td>Partnership for A Connected Illinois - Broadband Illinois</td>
<td>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.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Improving access to Illinois' expanding broadband network is an ongoing effort involving public and private, local, state, and federal agencies and organizations, including such agencies as Partnership for a Connected Illinois (fka Broadband Illinois), Rural USDA, the Illinois Department of Information Technology, and the Illinois Institute for Rural Affairs, among others. As part of its efforts to provide broadband access to low and moderate income households, the Illinois Housing Development Authority's Standards for Architectural Planning and Construction for new construction, rehabilitation and adaptive re-use include the capacity for each multi-family unit of new construction and rehabilitation to access high-speed internet either through wireless service or hard-wire connection to all residents, as a required, minimum project amenity for housing development funding under IHDA's multi-family programs including HOME, the National Housing Trust Fund, the State of Illinois Affordable Housing Trust Fund, and the federal Low-Income Housing Tax Credit program.</td>
</tr>
</tbody>
</table>

Narrative

IHDA's Strategic Planning and Reporting/Office of Housing Coordination Services provides coordination between State agencies, with statewide trade and membership organizations, regional and local agencies, and local governments. Its 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/SPAR 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 Tuesday, May 29, 2018 and ended Thursday, June 28, 2018. The State held one public hearing on Thursday, June 21, 2018 at 10:00 A.M. in Springfield. The Public Comment period and Hearing ran concurrently with the Public Comments period for a substantial amendment to the prior, 2010-2014 Consolidated Plan, regarding the HOPWA program administered by the Illinois Department of Public Health

- A 2018 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 sent notice of the public hearing to CDBG-eligible units of general local government.
- DCEO carried out additional activities on the State CDBG Citizen Participation Plan.
- Electronic copies of the draft Consolidated Plan-2018 Action Plan were sent to 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-2018 Action Plan were sent to interested parties as requested
- The public hearing was held Thursday June 21, during the 30-day public comments period. The June 21 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.
- One public comments letter was 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
<table>
<thead>
<tr>
<th>Sort Order</th>
<th>Mode of Outreach</th>
<th>Target of Outreach</th>
<th>Summary of response/attendance</th>
<th>Summary of comments received</th>
<th>Summary of comments not accepted and reasons</th>
<th>URL (If applicable)</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Public Hearing</td>
<td>Non-targeted/broad community</td>
<td>The public hearing was held Thursday, June 21, 2018 in Springfield. The meeting began with a presentation on housing activities in the Consolidated Plan, an historical overview of the Consolidated Plan development process, a description of the Action Plan content, anticipated funding levels, and all major proposed changes to the five HUD formula grant programs (CDBG, HOME, ESG, HOPWA and HTF). The audience was then invited to provide testimony and comments.</td>
<td>Comments by representative of the Menard County Housing Authority, regarding its use of IHDA programs.</td>
<td>Not Applicable. During the public hearing, comments by a member of the public expressed support for IHDA programs</td>
<td></td>
</tr>
<tr>
<td>Sort Order</td>
<td>Mode of Outreach</td>
<td>Target of Outreach</td>
<td>Summary of response/attendance</td>
<td>Summary of comments received</td>
<td>Summary of comments not accepted and reasons</td>
<td>URL (If applicable)</td>
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<tr>
<td>2</td>
<td>Newspaper Ad</td>
<td>Non-targeted/broad community</td>
<td>Generally, response to newspaper ads will result in attendance at the public hearing, or written letter response or email.</td>
<td>One public comments letter was received. See appendix for letter and written response</td>
<td>Not applicable</td>
<td><a href="http://www.ihda.org">http://www.ihda.org</a></td>
</tr>
<tr>
<td>3</td>
<td>Internet Outreach</td>
<td>Non-targeted/broad community</td>
<td>Generally, response to internet outreach will result in attendance at the public hearing, or written letter response or email</td>
<td>One public comments letter was received</td>
<td>Not applicable</td>
<td><a href="http://www.ihda.org">http://www.ihda.org</a></td>
</tr>
<tr>
<td>Sort Order</td>
<td>Mode of Outreach</td>
<td>Target of Outreach</td>
<td>Summary of response/attendance</td>
<td>Summary of comments received</td>
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</tr>
<tr>
<td>4</td>
<td>Public Meeting</td>
<td>Non-targeted/broad community</td>
<td>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</td>
<td>Minutes of the quarterly Advisory Committee Meetings are available upon request</td>
<td>Not applicable. All comments were considered</td>
<td></td>
</tr>
</tbody>
</table>

Table 4 – Citizen Participation Outreach
Expected Resources

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

Introduction

The Illinois Housing Development Authority (IHDA) has been designated by Governor Pat Quinn as the administering State agency for the national Affordable Housing Trust fund (HTF). The 2018 Illinois Allocation is $9,812,230. Eligible activities include: 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 national HTF program. IHDA will not allow the re-finance of existing debt as part of national HTF rental rehabilitation.

- Eligible use of funds include: loans (low-interest, no-interest, balloon, forgivable, deferred payment), grants, interest rate subsidies, equity...
investments, and other State-approved forms of assistance

**Anticipated Resources**
<table>
<thead>
<tr>
<th>Program</th>
<th>Source of Funds</th>
<th>Uses of Funds</th>
<th>Expected Amount Available Year 1</th>
<th>Narrative Description</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td>Annual Allocation: $</td>
<td></td>
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<tr>
<td></td>
<td></td>
<td></td>
<td>Program Income: $</td>
<td></td>
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<tr>
<td></td>
<td></td>
<td></td>
<td>Prior Year Resources: $</td>
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<td></td>
<td></td>
<td></td>
<td>Total: $</td>
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<td></td>
<td></td>
<td></td>
<td>Expected Amount Available Remainder of ConPlan $</td>
<td></td>
</tr>
</tbody>
</table>

Final State of Illinois - Annual Action Plan 2018
Grant funds available through the CDBG Community Development Block Grant Program are available to non-entitlement cities and counties on a competitive basis. Assistance can include: Housing Rehabilitation, Public Infrastructure improvements, and Economic Development among other activities. Beginning in 2017, the 3rd year of the 2015-2019 Consolidated Plan, CDBG funds will also provide funds for Disaster Response on an as-needed basis for communities affected by an unforeseen event declared as a Disaster by the Governor of the State of Illinois; and address Lead Remediation through a Pilot Project in the local target area of Galesburg, Illinois. Additionally beginning in 2017, the State will address requirements necessary to remedy HUD’s 2013 Monitoring Finding concerning the Revolving Loan Fund program. HUD regulations provide that 3% of the CDBG allocation and Program income plus $100,000 can be used for Administration and Technical Assistance for the State-administered program. In 2018, this will equate to at least $968,341 and may grow to $1,444,705 depending on program income received. Any funds not

<table>
<thead>
<tr>
<th>CDBG</th>
<th>public</th>
<th>Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td>28,944,705 0 0 28,944,705 53,171,329</td>
</tr>
</tbody>
</table>

Final State of Illinois - Annual Action Plan 2018 46

OMB Control No: 2506-0117 (exp. 06/30/2018)
<table>
<thead>
<tr>
<th>Program</th>
<th>Source of Funds</th>
<th>Uses of Funds</th>
<th>Expected Amount Available Year 1</th>
<th>Narrative Description</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td><strong>Annual Allocation: $</strong></td>
<td></td>
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<tr>
<td></td>
<td></td>
<td></td>
<td><strong>Program Income: $</strong></td>
<td></td>
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<td></td>
<td><strong>Prior Year Resources: $</strong></td>
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<td></td>
<td><strong>Total: $</strong></td>
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<td></td>
<td><strong>Expected Amount Available Remainder of ConPlan $</strong></td>
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<td></td>
<td></td>
</tr>
<tr>
<td>HOME</td>
<td>public - federal</td>
<td>Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA</td>
<td>16,288,968 9,713,768 0 26,002,736 22,917,238</td>
<td>Per HUD’s guidelines IHDA no longer operates on a FIFO but by Grant Based Accounting. The deadline for committing program income, repayments and recaptured funds received during a program year is the date of the P.J.’s commitment deadline for the subsequent year’s grant allocation therefore the program income listed here is 2017 Program Income which has the same deadline as 2018 Grant Funds.</td>
</tr>
<tr>
<td>Program</td>
<td>Source of Funds</td>
<td>Uses of Funds</td>
<td>Expected Amount Available Year 1</td>
<td>Narrative Description</td>
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<tr>
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</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Annual Allocation: $</td>
<td>Program Income: $</td>
</tr>
<tr>
<td>HOPWA</td>
<td>public - federal</td>
<td>Permanent housing in facilities</td>
<td>1,535,465</td>
<td>0</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Permanent housing placement</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>Short term or transitional housing facilities</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>STRMU Supportive services</td>
<td></td>
<td></td>
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<tr>
<td></td>
<td></td>
<td>TBRA</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

HOPWA funds will be used to provide short term mortgage, utility tenant based assistance and facility based rental assistance. In addition funding will provide operating costs, repair/rehab and supportive services to persons residing in housing facilities around the State.
<table>
<thead>
<tr>
<th>Program</th>
<th>Source of Funds</th>
<th>Uses of Funds</th>
<th>Expected Amount Available Year 1</th>
<th>Narrative Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>ESG</td>
<td>public - federal</td>
<td>Conversion and rehab for transitional housing, Financial Assistance, Overnight shelter, Rapid rehousing (rental assistance), Rental Assistance Services, Transitional housing</td>
<td></td>
<td>ESG funds are used for street outreach, emergency shelter, homeless prevention, rapid rehousing, HMIS, and administration</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Annual Allocation: $</td>
<td>Program Income: $</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>4,612,743</td>
<td>0</td>
</tr>
<tr>
<td>Program</td>
<td>Source of Funds</td>
<td>Uses of Funds</td>
<td>Expected Amount Available Year 1</td>
<td>Narrative Description</td>
</tr>
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<td>---------</td>
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<td>---------------------------------</td>
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</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Annual Allocation: $</td>
<td>Program Income: $</td>
</tr>
<tr>
<td>HTF</td>
<td>public - federal</td>
<td>Acquisition Admin and Planning Homebuyer assistance Multifamily rental new construction Multifamily rental rehab New construction for ownership</td>
<td>9,812,230</td>
<td>0</td>
</tr>
<tr>
<td>Housing Trust Fund</td>
<td>public - federal</td>
<td>Multifamily rental new construction Multifamily rental rehab Other</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Other</td>
<td>public - federal</td>
<td>Public Improvements</td>
<td>0</td>
<td>0</td>
</tr>
</tbody>
</table>

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
ESG: Each grant recipient must supplement its Emergency Solutions Grant funds with an equal or greater amount of funds from other sources. 25% of the match must be cash. The amount available for matching fund purposes must be injected during the grant period.

Acceptable sources of ESG 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 Block Grant Program:

The State must match all but $100,000 of the funds received for program administration. Public Infrastructure grants may be used to fund Construction only and other costs must be locally funded unless determined to be an economic hardship. Economic Development grants must be matched (at a minimum) dollar for dollar. Housing Rehabilitation grants do not require leverage.

Housing Trust Fund: For the national HTF, Projects which are able to commit other non-federal funds as part of their project financing will be given additional consideration. There is no State or local match requirements for the national HTF, but IHDA anticipates most national HTF-funded projects will be highly leveraged.
If appropriate, describe publically owned land or property located within the jurisdiction that may be used to address the needs identified in the plan

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

Discussion

The Authority’s HOME Program generates program income from two sources: interest income and loan repayment/recaptured funds. Because of Grant Based Accounting, FY 2017 Program Income and the FY 2018 HOME Grant will have the same commitment deadline. Also Program Income must be fully disbursed before Treasury funds if committed to the same activity. There is a balance of $9,713,768 in program income for PY 2017. Ten percent of program income minus recapture will be made available for administrative costs which is $971,376 for PY 2017. Ten percent of the 2018 HOME allocation will be made available for administrative costs which is $1,628,896 for PY 2018.

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

<table>
<thead>
<tr>
<th>Sort Order</th>
<th>Goal Name</th>
<th>Start Year</th>
<th>End Year</th>
<th>Category</th>
<th>Geographic Area</th>
<th>Needs Addressed</th>
<th>Funding</th>
<th>Goal Outcome Indicator</th>
</tr>
</thead>
<tbody>
<tr>
<td>2</td>
<td>Single Family Owner Occupied Rehabilitation</td>
<td>2015</td>
<td>2019</td>
<td>Affordable Housing</td>
<td>Statewide Distribution</td>
<td>Affordable Housing</td>
<td>CDBG: $6,500,000</td>
<td>Homeowner Housing Rehabilitated: 130 Household Housing Unit</td>
</tr>
</tbody>
</table>
### Table 6 – Goals Summary

<table>
<thead>
<tr>
<th>Sort Order</th>
<th>Goal Name</th>
<th>Start Year</th>
<th>End Year</th>
<th>Category</th>
<th>Geographic Area</th>
<th>Needs Addressed</th>
<th>Funding</th>
<th>Goal Outcome Indicator</th>
</tr>
</thead>
<tbody>
<tr>
<td>3</td>
<td>Public Infrastructure Activities</td>
<td>2015</td>
<td>2019</td>
<td>Non-Housing Community Development</td>
<td>Statewide Distribution</td>
<td>Community and Economic Development</td>
<td>CDBG: $17,000,000</td>
<td>Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 12000 Persons Assisted</td>
</tr>
<tr>
<td>4</td>
<td>Economic Development</td>
<td>2015</td>
<td>2019</td>
<td>Non-Housing Community Development</td>
<td>Statewide Distribution</td>
<td>Community and Economic Development</td>
<td>CDBG: $4,000,000</td>
<td>Jobs created/retained: 114 Jobs Businesses assisted: 4 Businesses Assisted</td>
</tr>
</tbody>
</table>

#### Goal Descriptions

1. **Goal Name**: Multifamily Affordable Housing
   **Goal Description**: Goals are determined by dividing multi-family allocation by per unit cost to determine the number of multifamily HOME and (national) Housing Trust Fund units rehabbed or newly constructed

2. **Goal Name**: Single Family Owner Occupied Rehabilitation
   **Goal Description**:  

---

Final State of Illinois - Annual Action Plan 2018  

OMB Control No: 2506-0117 (exp. 06/30/2018)
<table>
<thead>
<tr>
<th>3</th>
<th>Goal Name</th>
<th>Public Infrastructure Activities</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Goal Description</td>
<td>The number of persons served for the Public Infrastructure program is calculated by dividing the program budget of $15,000,000 by the grant ceiling of $500,000; equating to 30; and then multiplying by the average number of persons served by each Public Infrastructure grant (400); equaling 12,000. Beginning in 2017 and ending in 2019; this goal also includes $2,000,000 for the Disaster Response Program which provides funds for Disaster Response on an as-needed basis for communities affected by an unforeseen event declared a Disaster by the Governor. As there is no way to predict when and where a disaster will strike, anticipated outcomes are not included. HUD regulations provide that 3% of the CDBG allocation and Program income plus $100,000 can be used for Administration and Technical Assistance for the State-administered program. In 2018, this will equate to at least $968,341 and may grow to $1,444,705 depending on program income received. Any funds not utilized for Administration will be re-programmed for other CDBG eligible purposes. In case of emergency, the Department of Commerce and Economic Opportunity reserves the right to change allocations to address specific needs of the communities affected.</td>
</tr>
<tr>
<td>4</td>
<td>Goal Name</td>
<td>Economic Development</td>
</tr>
<tr>
<td>---</td>
<td>----------------</td>
<td>----------------------</td>
</tr>
<tr>
<td><strong>Goal Description</strong></td>
<td>The number of persons and businesses served for the Economic Development program is calculated by dividing the program budget of $4,000,000 by the grant ceiling of $1,000,000; equating to 4 businesses; and then multiplying by the maximum federal jobs to dollars ratio of $1 to $35,000; equaling 114. HUD regulations provide that 3% of the CDBG allocation and Program income plus $100,000 can be used for Administration and Technical Assistance for the State-administered program. In 2018, this will equate to at least $968,341 and may grow to $1,444,705 depending on program income received. Any funds not utilized for Administration will be re-programmed for other CDBG eligible purposes. In case of emergency, the Department of Commerce and Economic Opportunity reserves the right to change allocations to address specific needs of the communities affected. <strong>Beginning in 2017 and ending in 2019:</strong></td>
<td></td>
</tr>
<tr>
<td></td>
<td>• Revolving Loan Fund Activities to address requirements necessary to comply with HUD Revolving Loan Fund Program monitoring</td>
<td></td>
</tr>
</tbody>
</table>
AP-25 Allocation Priorities – 91.320(d)

Introduction:

2018 Funding Allocations are as follows;

CDBG $28,944,705

HOME $16,288,968. The HOME CHDO set-aside is $2,443,345

ESG $4,612,743

HOPWA $1,535,465

HTF $9,182,230

CDBG: HUD regulations provide that 3% of the CDBG allocation and Program income plus $100,000 can be used for Administration and Technical Assistance for the State-administered program. In 2018, this will equate to at least $968,341 and may grow to $1,444,705 depending on
program income received. Any funds not utilized for Administration will be re-programmed for other CDBG eligible purposes.

HOME: Ten percent of the 2018 HOME allocation will be made available for administrative costs which is $1,628,896 for PY 2018.

HTF: 10% of HTF funds ($981,223) will be for made available for administrative costs in 2018.

ESG: up to 7.5% of funds ($345,955) will be used for allowable administrative costs.

HOPWA: Up to 3% of funds $30,010.65 will be used for allowable administrative costs

### Funding Allocation Priorities

<table>
<thead>
<tr>
<th></th>
<th>Multifamily Affordable Housing (%)</th>
<th>Single Family Owner Occupied Rehabilitation (%)</th>
<th>Public Infrastructure Activities (%)</th>
<th>Economic Development (%)</th>
<th>Total (%)</th>
</tr>
</thead>
<tbody>
<tr>
<td>CDBG</td>
<td>0</td>
<td>24</td>
<td>55</td>
<td>21</td>
<td>100</td>
</tr>
<tr>
<td>HOME</td>
<td>100</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>100</td>
</tr>
<tr>
<td>HOPWA</td>
<td>100</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>100</td>
</tr>
<tr>
<td>ESG</td>
<td>100</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>100</td>
</tr>
<tr>
<td>HTF</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Housing Trust Fund</td>
<td>100</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>100</td>
</tr>
<tr>
<td>Other CDBG-DR</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
</tbody>
</table>

Table 7 – 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.

Homeownership and additional non-CDBG single-family rehabilitation activities are funded by IHDA with non-federal State resources
Regarding national HTF Funds: HTF Funding provides rental assistance for families at 30% AMI or below.

HOPWA funding only serves people living with HIV/AIDS that are currently housed and with a household income at 80 percent or below of the area medium income. Funding will be provided to eight 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. The State of Illinois HOPWA program plans to extend the use of its funding to provide other housing options that can be used throughout the state of Illinois if funds are available. IDPH would like to use funds in the service category of facility-Based Housing Assistance. These funds will be used for community residential facilities including community residential, Single Room Occupancy (SRO) dwellings, short-term facility, project based rental units and master leased units serving low income individuals with HIV/AIDS. In additional, HIV Care Connect Region has expressed interest in pursuing Tenant-Based Rental Assistance. Housing Facilities have also expressed interest in receiving funding for needed repairs and rehab.

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. Activities addressing emergencies will be separated out as Disaster Response to address CPD Notice 17-06. The Help Eliminate Lead Program (HELP) Pilot Project is ongoing in the targeted community of Galesburg, IL. EPA data indicates the city has one of the nation’s most persistent lead problems, exceeding the federal lead-action level in 22 out of 30 sampling periods since 1992. In addition, one in 20 children under the age of six in the County have elevated blood lead levels. DCEO is addressing this issue through the implementation of the Help Eliminate Lead Program (HELP) Pilot Project.

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 increased affordable renter opportunities across the State

All national HTF funding will result in increased affordable renter opportunities for households at or below 30% AMI, across the State

CDBG Housing Rehabilitation Activities will result in the preservation of affordable housing in non-entitlement areas of the State

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.
Introduction:

Below are the Methods of Distribution from the eligible program activities under the CDBG, HOME, ESG, HOPWA and HTF programs.

Distribution Methods

Table 8 - Distribution Methods by State Program

<table>
<thead>
<tr>
<th></th>
<th>State Program Name:</th>
<th>CDBG Disaster Response Program</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Funding Sources:</td>
<td>CDBG</td>
</tr>
<tr>
<td></td>
<td>Describe the state program addressed by the Method of Distribution.</td>
<td>In response to CPD Notice 17-06, this as-needed program is designed for communities affected by an unforeseen event resulting in a State Disaster Declaration by the Governor of the State of Illinois.</td>
</tr>
</tbody>
</table>
**ELIGIBILITY THRESHOLDS**

Projects must meet the following minimum thresholds:

1. Application must be for an area included in a Disaster Declaration by the Governor of the State of Illinois.
2. The community must be unable to finance the activity on its own; and
3. The community has exhausted all other options/sources for funding the activity.

**DOCUMENTATION REQUIREMENTS**

1. Each application must include the UGLG’s most recent audit. If unavailable, please contact the Department to determine potential alternative documentation.
2. All required application forms must be completed with appropriate backup documentation.
3. The Department reserves the right to designate an application “DO NOT FUND”, and not complete the rest of its’ review for the following reasons: Using self-created forms. Forged, copied, taped, pasted or any alterations to original signatures or dates.
4. The project must qualify for the National Objective of Urgent Need, however, the percentage of Low-to-Moderate income persons in the area must be provided. If the area meets or exceeds 51% LMI, the National Objective of LMI will be utilized in the grant award.

Application Guidelines and forms can be found at: [http://www.illinois.gov/dceo](http://www.illinois.gov/dceo)
| 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) | N/A |
| Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only) | N/A |
Describe how resources will be allocated among funding categories.

<table>
<thead>
<tr>
<th>Program Category</th>
<th>Budget</th>
<th>Ceiling</th>
<th>Deadline</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Ongoing (non-competitive Programs)</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Economic Development (ED)</td>
<td>$4,000,000</td>
<td>$1,000,000</td>
<td>NA</td>
</tr>
<tr>
<td>Disaster Response (DR)</td>
<td>$2,000,000</td>
<td>$500,000</td>
<td>NA</td>
</tr>
<tr>
<td><strong>Competitive Programs</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Public Infrastructure (PI)</td>
<td>$15,000,000</td>
<td>$500,000</td>
<td>11/02/2018</td>
</tr>
<tr>
<td>Housing Rehabilitation (HR)</td>
<td>$6,500,000</td>
<td>$500,000</td>
<td>11/02/2018</td>
</tr>
<tr>
<td><strong>Pilot Project</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Help Eliminate Lead Program (HELP)</td>
<td>$Ongoing; no new funding</td>
<td>NA</td>
<td></td>
</tr>
</tbody>
</table>

Describe threshold factors and grant size limits.

Application must come after a State Disaster Declaration by the Governor for the area. Grant limit is $500,000 unless the limit is waived by DCEO's Director.
| 2 | **State Program Name:** | CDBG Economic Development Grant Program |
| 2 | **Funding Sources:** | CDBG |
| 2 | **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. |

What are the outcome measures expected as a result of the method of distribution?

Unknown at this time.
<p>| Describe all of the criteria that will be used to select applications and the relative importance of these criteria. |  |
| Application Guidelines and forms can be found at: <a href="http://www.illinois.gov/dceo">http://www.illinois.gov/dceo</a> |  |</p>
<table>
<thead>
<tr>
<th>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)</th>
<th>N/A</th>
</tr>
</thead>
<tbody>
<tr>
<td>Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)</td>
<td>N/A</td>
</tr>
</tbody>
</table>
Describe how resources will be allocated among funding categories.

<table>
<thead>
<tr>
<th>Program Category</th>
<th>Budget</th>
<th>Ceiling</th>
<th>Deadline</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Ongoing (non-competitive Programs)</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Economic Development (ED)</td>
<td>$4,000,000</td>
<td>$1,000,000</td>
<td>NA</td>
</tr>
<tr>
<td>Disaster Response (DR)</td>
<td>$2,000,000</td>
<td>$500,000</td>
<td>NA</td>
</tr>
<tr>
<td><strong>Competitive Programs</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Public Infrastructure (PI)</td>
<td>$15,000,000</td>
<td>$500,000</td>
<td>11/02/2018</td>
</tr>
<tr>
<td>Housing Rehabilitation (HR)</td>
<td>$6,500,000</td>
<td>$500,000</td>
<td>11/02/2018</td>
</tr>
<tr>
<td><strong>Pilot Project</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Help Eliminate Lead Program (HELP)</td>
<td>$ Ongoing; no new funding</td>
<td>NA</td>
<td></td>
</tr>
</tbody>
</table>

Describe threshold factors and grant size limits.

CDBG Economic Development component funds may be used to assist for-profit and not-for-profit firms to carry out economic development projects. Generally, CDBG grant funds will be provided by the unit of local government to the profit or not-for-profit business under a financial assistance agreement at agreed upon terms.

1. The business may use funds for:
   - Acquisition of land or building;
   - Purchase or installation of fixtures;
   - Construction, reconstruction, installation or rehabilitation of commercial or industrial buildings, structures and other real property;
   - Leasehold improvements; and
   - Working capital expenses (inventory, employee salaries, general operating expenses and advertising/marketing expenses).

2. Units of local government may use CDBG funds for public infrastructure improvements in support of economic development.
## What are the outcome measures expected as a result of the method of distribution?

The number of persons and businesses served for the Economic Development program is calculated by dividing the program budget of $4,000,000 by the grant ceiling of $1,000,000; equating to 4 businesses; and then multiplying by the maximum federal jobs to dollars ration of $1 to $35,000; equaling 114.

| 3 | State Program Name: | CDBG Housing Rehabilitation Grant Program |
| 3 | Funding Sources: | CDBG |
| 3 | Describe the state program addressed by the Method of Distribution. | The program targets housing projects which preserve single family, owner occupied housing and encourage neighborhood revitalization. The funds are available to address housing needs of eligible low-to-moderate income households |
The maximum available points per application are 100 points. The maximum scores available for each of the four scoring criteria are:

1. **Project Need – Maximum Score 20 Points**
   - The selected target area must include a minimum of a three to one ratio of need for rehabilitation of income eligible housing units in comparison to the project scope of work as provided in the Housing Fact Sheet.

2. **Project Impact – Maximum Score 20 Points**
   - Description of targeted area selection method and achievement of quantifiable impact.

3. **Coordination of Resources – Maximum Score 20 Points**
   - Scores will be provided based upon the applicant’s submission of documentation of additional resources which will provide assistance to LMI households in coordination with the CDAP housing programs.

4. **Project Readiness – Maximum Score 40 Points**
   - Scores will be provided based upon the applicant’s submission of documentation that all administrative and technical issues involved in assuring a successful housing project have been addressed.

Application Guidelines and forms can be found at: http://www.illinois.gov/dceo
<table>
<thead>
<tr>
<th>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)</th>
<th>N/A</th>
</tr>
</thead>
<tbody>
<tr>
<td>Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)</td>
<td>N/A</td>
</tr>
</tbody>
</table>
Describe how resources will be allocated among funding categories.

<table>
<thead>
<tr>
<th>Program Category</th>
<th>Budget</th>
<th>Ceiling</th>
<th>Deadline</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Ongoing (non-competitive Programs)</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Economic Development (ED)</td>
<td>$4,000,000</td>
<td>$1,000,000</td>
<td>NA</td>
</tr>
<tr>
<td>Disaster Response (DR)</td>
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<td>$500,000</td>
<td>NA</td>
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<td><strong>Competitive Programs</strong></td>
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<td></td>
<td></td>
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<tr>
<td>Public Infrastructure (PI)</td>
<td>$15,000,000</td>
<td>$500,000</td>
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<td>$6,500,000</td>
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</tr>
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<td><strong>Pilot Project</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Help Eliminate Lead Program (HELP)</td>
<td>$Ongoing; no new funding</td>
<td>NA</td>
<td></td>
</tr>
</tbody>
</table>

Describe threshold factors and grant size limits.

Benefit to Low-and-Moderate Income Persons: Each application must include documentation that the proposed project will benefit 100% low-to-moderate income persons. Those projects benefiting less than 100% low-to-moderate income persons will not be considered further.
### What are the outcome measures expected as a result of the method of distribution?

CDBG Housing Rehabilitation Program goals are determined by dividing the program budget of $6,500,000 by the grant ceiling of $500,000 to equal 13 grants, multiplied by the anticipated number of homes (10) that can be served at the maximum budget amount per home ($45,000).

<p>| | |</p>
<table>
<thead>
<tr>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>State Program Name:</strong></td>
<td>CDBG Public Infrastructure Grant Program</td>
</tr>
<tr>
<td><strong>Funding Sources:</strong></td>
<td>CDBG</td>
</tr>
<tr>
<td><strong>Describe the state program addressed by the Method of Distribution.</strong></td>
<td>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</td>
</tr>
<tr>
<td>Describe all of the criteria that will be used to select applications and the relative importance of these criteria.</td>
<td></td>
</tr>
<tr>
<td>---</td>
<td></td>
</tr>
<tr>
<td>Application Guidelines and forms can be found at: <a href="http://www.illinois.gov/dceo">http://www.illinois.gov/dceo</a></td>
<td></td>
</tr>
</tbody>
</table>

If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)

Application Guidelines and forms can be found at: http://www.illinois.gov/dceo
<table>
<thead>
<tr>
<th>Description</th>
<th>Response</th>
</tr>
</thead>
<tbody>
<tr>
<td>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)</td>
<td>N/A</td>
</tr>
<tr>
<td>Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)</td>
<td>N/A</td>
</tr>
</tbody>
</table>
Describe how resources will be allocated among funding categories.

<table>
<thead>
<tr>
<th>Program Category</th>
<th>Budget</th>
<th>Ceiling</th>
<th>Deadline</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Ongoing (non-competitive Programs)</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Economic Development (ED)</td>
<td>$4,000,000</td>
<td>$1,000,000</td>
<td>NA</td>
</tr>
<tr>
<td>Disaster Response (DR)</td>
<td>$2,000,000</td>
<td>$500,000</td>
<td>NA</td>
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<tr>
<td><strong>Competitive Programs</strong></td>
<td></td>
<td></td>
<td></td>
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<td>$15,000,000</td>
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</tr>
<tr>
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<td>$6,500,000</td>
<td>$500,000</td>
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<tr>
<td><strong>Pilot Project</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Help Eliminate Lead Program (HELP)</td>
<td>Ongoing; no new funding</td>
<td></td>
<td>NA</td>
</tr>
</tbody>
</table>

Describe threshold factors and grant size limits.

Eligibility Threshold requirements:
- Low-to-Moderate Income Community (51% or greater) (Y or N)
- 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 $15,000,000 by the grant ceiling of $500,000; equating to 28; and then multiplying by the average number of persons served by each Public Infrastructure grant (400); equaling 12,000. |

<p>| 5 | State Program Name: | CDBG Section 108 Loan Guarantee Program |
|  | Funding Sources:    | CDBG                                      |
|  | Describe the state program addressed by the Method of Distribution. | Since authorization for the Section 108, the State of Illinois has not received any fundable applications. Consequently, as of 2018 the State is discontinuing the program, and instead focusing its’ resources on a broader Economic Development grant program. The State feels the Economic Development grants will be a more useful tool to businesses than Section 108 Loans. |</p>
<table>
<thead>
<tr>
<th>Describe all of the criteria that will be used to select applications and the relative importance of these criteria.</th>
<th>N/A</th>
</tr>
</thead>
<tbody>
<tr>
<td>If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)</td>
<td>N/A</td>
</tr>
<tr>
<td>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)</td>
<td>N/A</td>
</tr>
<tr>
<td>---</td>
<td>---</td>
</tr>
<tr>
<td>Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)</td>
<td>N/A</td>
</tr>
<tr>
<td>Describe how resources will be allocated among funding categories.</td>
<td>N/A</td>
</tr>
<tr>
<td>Describe threshold factors and grant size limits.</td>
<td>N/A</td>
</tr>
<tr>
<td><strong>State Program Name:</strong></td>
<td>CDBG-DR Sandy Public Infrastructure Grants</td>
</tr>
<tr>
<td>-----------------------</td>
<td>-------------------------------------------</td>
</tr>
<tr>
<td><strong>Funding Sources:</strong></td>
<td>CDBG</td>
</tr>
</tbody>
</table>

What are the outcome measures expected as a result of the method of distribution? N/A
Describe the state program addressed by the Method of Distribution.

The Disaster Relief Appropriations Act, 2013 (Pub. L. 113-2, approved January 29, 2013) (Appropriations Act) made available $16 billion in Community Development Block Grant (CDBG) funds for necessary expenses related to disaster relief, long-term recovery, restoration of infrastructure, housing, and economic revitalization in the most impacted and distressed areas resulting from a major disaster declared pursuant to the Robert T. Stafford Disaster Relief and Emergency Act of 1974 (42 U.S.C. 5121 et seq.) (Stafford Act), due to Hurricane Sandy and other eligible events in calendar years 2011, 2012, 2013.

Subsequent to the Act, on December 16, 2013 a Federal Notice was published (Federal Register Volume 78, No. 241) that built upon the requirements of the aforementioned Act and advised the public of a $128,500,000 allocation for the purpose of assisting recovery in the most impacted and distressed areas in Colorado, Illinois and Oklahoma declared a major disaster in 2013. As the Appropriations Act requires funds to be awarded directly to a State, or unit of general local government. In addition, The Appropriations Act requires funds to be used only for specific disaster recovery-related purposes. The law also requires that prior to the obligation of funds, a the State must submit a plan detailing the proposed use of funds, including criteria for eligibility and how the use of these funds will address disaster relief, long-term recovery, restoration of infrastructure and housing and economic revitalization in the most impacted and distressed areas. Detailed information on the use of the $10,400,000 awarded the State to meet those needs are included as part of the 2013 Disaster Recovery Action Plan. All Sandy Disaster funding has been allocated and spent as of April, 2018.
<table>
<thead>
<tr>
<th><strong>Describe all of the criteria that will be used to select applications and the relative importance of these criteria.</strong></th>
<th>N/A</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)</strong></td>
<td>N/A</td>
</tr>
<tr>
<td>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)</td>
<td>N/A</td>
</tr>
<tr>
<td>Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)</td>
<td>N/A</td>
</tr>
<tr>
<td>Describe how resources will be allocated among funding categories.</td>
<td>N/A</td>
</tr>
<tr>
<td>Describe threshold factors and grant size limits.</td>
<td>N/A</td>
</tr>
<tr>
<td><strong>What are the outcome measures expected as a result of the method of distribution?</strong></td>
<td>N/A</td>
</tr>
</tbody>
</table>

| 7 | **State Program Name:** | Emergency Solutions Grants Program |
| **Funding Sources:** | ESG |
| **Describe the state program addressed by the Method of Distribution.** | The Emergency Solutions Grants 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 that will be used to select applications and the relative importance of these criteria. | Recommendations for funding are based on: the needs assessment conducted by the regional Homeless Continuums of Care, housing analysis, and performance of the provider agency (based on HMIS (Homeless Management Information System) and other factors). |

<p>| If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only) |  |</p>
<table>
<thead>
<tr>
<th>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)</th>
<th>Deliberate steps are taken to identify the providers, either units of local government or not-for-profit organizations, based on regional need and the ability to administer and expend the funds. The Department uses a formula based spreadsheet in order to determine the amount of ESG funding for each Continuum of Care (CoC). The spreadsheet includes statistical data for poverty, housing, population, etc.. These amounts are then provided to each CoC with a request for funding recommendations. They are asked to provide the organization name, amount of funding recommended and the activities recommended for funding. The recommended organizations are required to submit a completed application including a budget. The applications are reviewed for completeness by at least 2 staff persons. If necessary, a list of &quot;Outstanding Application Requirements&quot; is sent to the provider detailing documentation that is still needed.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)</td>
<td></td>
</tr>
<tr>
<td>Describe how resources will be allocated among funding categories.</td>
<td>Resources are allocated to eligible ESG activities based on Continuum of Care recommendations, as needs vary across the communities</td>
</tr>
<tr>
<td>Describe threshold factors and grant size limits.</td>
<td>ESG minimum grant award is $25,000. Recipients must be a participating member of a Homeless Continuum of Care</td>
</tr>
<tr>
<td>What are the outcome measures expected as a result of the method of distribution?</td>
<td>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 to homeless individuals and families who need emergency shelter</td>
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</tbody>
</table>

<table>
<thead>
<tr>
<th>8</th>
<th>State Program Name: Help Eliminate Lead Program (HELP) Pilot Program</th>
</tr>
</thead>
<tbody>
<tr>
<td>Funding Sources: CDBG</td>
<td></td>
</tr>
<tr>
<td>Describe the state program addressed by the Method of Distribution.</td>
<td>The Help Eliminate Lead Program (HELP) Pilot Project is being conducted in the targeted community of Galesburg, IL. EPA data indicates the city has one of the nation’s most persistent lead problems, exceeding the federal lead-action level for lead in their potable water system in 22 out of 30 sampling periods since 1992. In addition, one in 20 children under the age of six in the County have elevated blood lead levels. DCEO is addressing this issue through the implementation of the Help Eliminate Lead Program (HELP) Pilot Project. HELP is a cross-agency initiative to reduce children’s exposure to lead and lessen the number of children in Illinois who suffer from its detrimental health effects. This program will be done in cooperation with an IEPA project to assist the community in replacing water lead-service lines. The results of this pilot project will help Illinois provide a comprehensive lead hazard control program to low-income families who occupy substandard pre-1978 privately-owned housing throughout Illinois. DCEO Community Development Block Grant (CDBG) funds will provide $500,000 from 2017 funds for the program.</td>
</tr>
<tr>
<td><strong>Describe all of the criteria that will be used to select applications and the relative importance of these criteria.</strong></td>
<td>Pilot Project</td>
</tr>
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</tr>
<tr>
<td><strong>If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)</strong></td>
<td>The Department will develop processes as identified in our application to the Lead-Based Paint Hazard Control (LBPHC) Grant Program FR-6100-N-12.</td>
</tr>
<tr>
<td>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)</td>
<td>N/A</td>
</tr>
<tr>
<td>Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)</td>
<td>N/A</td>
</tr>
<tr>
<td>Describe how resources will be allocated among funding categories.</td>
<td>N/A</td>
</tr>
<tr>
<td>---------------------------------------------------------------</td>
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</tr>
<tr>
<td>Describe threshold factors and grant size limits.</td>
<td>N/A</td>
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</tbody>
</table>
The mission of the HELP program is to improve the health and well-being of Illinois residents, especially vulnerable populations such as children under the age of six, by promoting safe and healthy home environments through comprehensive home-based intervention programs, lead certification and regulations, public education, outreach, and statewide partnerships.

<table>
<thead>
<tr>
<th>State Program Name:</th>
<th>HOME Multifamily (including CHDO)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Funding Sources:</td>
<td>HOME</td>
</tr>
<tr>
<td>Describe the state program addressed by the Method of Distribution.</td>
<td>Multi-family new construction and rehabilitation (including Community Housing Development Organizations - CHDOs)</td>
</tr>
<tr>
<td><strong>Describe all of the criteria that will be used to select applications and the relative importance of these criteria.</strong></td>
<td>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.</td>
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</tr>
<tr>
<td><strong>If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)</strong></td>
<td>IHDA's Multi-Family common application system, forms, and instructions are posted on IHDA's website at <a href="http://www.ihda.org/developer/forms.htm#referenceDocuments">www.ihda.org/developer/forms.htm#referenceDocuments</a></td>
</tr>
<tr>
<td>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)</td>
<td>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 to the IHDA Board for final consideration and approval.</td>
</tr>
</tbody>
</table>

| 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.

Under the 2015-2019 Consolidated Plan, IHDA is only utilizing HOME funding for rental housing development/rehabilitation. The program uses IHDA's "Common" 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 application referenced above. Grant (loan) size limits have been imposed recently for IHDA's subordinate debt sources (i.e., primarily HOME and (State) Affordable Housing Trust Fund) due to relative lack of availability to meet demand. It is primarily involving projects also seeking Low Income Housing Tax Credit assistance. For non-metro and AHPAA areas, it is set at 20% of total development costs, capped at a maximum request of $2 million. For Chicago, Chicago metro, and other metro areas, it is set at 10% of total development costs, capped at a maximum request of $1 million.
The State of Illinois will use the following HUD-determined Objective and Outcome statements for its CPD-HOME formula activities, expressed via the number of affordable housing units provided/preserved:

- 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

<table>
<thead>
<tr>
<th>10</th>
<th>State Program Name:</th>
<th>HOPWA Facility Based Rental Assistance</th>
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</thead>
<tbody>
<tr>
<td></td>
<td>Funding Sources:</td>
<td>HOPWA</td>
</tr>
<tr>
<td></td>
<td>Describe the state program addressed by the Method of Distribution.</td>
<td>The HOPWA facility based program will provide rent and supportive services to persons living with HIV/AIDS. The Illinois HOPWA program eligibility is based on the 80% area median income. The individual requesting housing assistance must demonstrate a need for housing assistance. Funding will expand to outside the Illinois HOPWA jurisdictional area.</td>
</tr>
<tr>
<td>Describe all of the criteria that will be used to select applications and the relative importance of these criteria.</td>
<td>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 is expected to fund Project sponsors located around the State. Facility based rental assistance will allow the State to ensure that housing is available to the most at risk individuals living with HIV/AIDS that require more intensive supportive living environment to deal with other issues.</td>
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</tbody>
</table>
| 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) | Application process will be extended to the entire State with the intent to provide emergency and stable housing to individuals living with HIV/AIDS who are at-risk of homelessness. Stable housing provides a foundation for individuals with chronic illness such as HIV/AIDS, to improve their health outcomes |

Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only) |
<table>
<thead>
<tr>
<th>Describe how resources will be allocated among funding categories.</th>
<th>Resources that are allocated through the State of Illinois HIV Care Region and will be based on the guidelines established for the facility based rental assistance.</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Describe threshold factors and grant size limits.</strong></td>
<td>The HIV Care Connect Region funding formula is based on an annual award amount that is based on the morbidity data. All HIV Care Connect are increased based on the increase in housing costs 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 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 will be based on funding availability.</td>
</tr>
<tr>
<td>What are the outcome measures expected as a result of the method of distribution?</td>
<td>Safe and affordable housing is the expected outcome of the method of distribution. Housing for persons with HIV/AIDS is an important component of the national 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.</td>
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<tr>
<td><strong>11</strong></td>
<td><strong>State Program Name:</strong> HOPWA Facility-Based Housing Operations Assistance Program</td>
</tr>
<tr>
<td><strong>Funding Sources:</strong></td>
<td>HOPWA</td>
</tr>
</tbody>
</table>
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. Several housing facilities have requested funding for housing. Kane County was recently added to the State of Illinois service area. Kane County was located in the Chicago EMA.

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. Funding will be extended to the State of Illinois to ensure that needed services are provided to persons living with HIV/AIDS.

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.
<table>
<thead>
<tr>
<th>If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)</th>
</tr>
</thead>
<tbody>
<tr>
<td>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)</td>
</tr>
<tr>
<td>Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)</td>
</tr>
<tr>
<td>Describe how resources will be allocated among funding categories.</td>
</tr>
<tr>
<td><strong>Describe threshold factors and grant size limits.</strong></td>
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<tr>
<td><strong>What are the outcome measures expected as a result of the method of distribution?</strong></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th><strong>State Program Name:</strong></th>
<th>HOPWA Facility-Based Housing Rehabilitation and Repair</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Funding Sources:</strong></td>
<td>HOPWA</td>
</tr>
<tr>
<td>Describe the state program addressed by the Method of Distribution.</td>
<td>This program provides funding for HOPWA Facility-Based Housing Rehabilitation and Repair activities to ensure the preservation of decent, safe housing for clients of the HOPWA program</td>
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<tr>
<td>Describe all of the criteria that will be used to select applications and the relative importance of these criteria.</td>
<td>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 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</td>
</tr>
<tr>
<td>If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)</td>
<td></td>
</tr>
<tr>
<td>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)</td>
<td>The sponsor selection process is based on the Lead Agencies that receive funding for Ryan White Title II funds. Each Regional Care Connect office has a local advisory board to assist the lead agency with determining priority services. The Department allows the HIV Care Connect Lead Agents to subcontract with local service providers for housing services. The Department holds meetings with lead agencies, giving instruction on how to include faith-based organizations as entities eligible to apply for funding. 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 required 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.</td>
</tr>
<tr>
<td>Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)</td>
<td></td>
</tr>
<tr>
<td>Describe how resources will be allocated among funding categories.</td>
<td>The application requires a description of all housing categories to be provided. The application requires 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 requires a project plan and budget, and an environmental review, 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.</td>
</tr>
<tr>
<td>Describe threshold factors and grant size limits.</td>
<td>AIDS designed housing facilities which are located in the HIV Care Connect Region receive funding for necessary rehabilitation and repair to preserved safe, decent housing for persons living HIV/AIDS who are in need of housing and supportive services. Maximum grant amounts are $168,848 for Rehabilitation/Repairs and Housing Supports</td>
</tr>
<tr>
<td>What are the outcome measures expected as a result of the method of distribution?</td>
<td>Decent safe and affordable housing.</td>
</tr>
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</tr>
<tr>
<td><strong>State Program Name:</strong></td>
<td>HOPWA Short-term Rent, Utility, Mortgage Program</td>
</tr>
<tr>
<td><strong>Funding Sources:</strong></td>
<td>HOPWA</td>
</tr>
<tr>
<td><strong>Describe the state program addressed by the Method of Distribution.</strong></td>
<td>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 the 80% area median income. The individual requesting housing assistance must demonstrate a need for housing assistance. In addition, the Department of Public Health had allocated funding to Winnebago County Health Department to provide Tenant based rental assistance. Currently, ten remain stably housed. Housing service caps are instituted under the HOPWA program to include uniformity and non-discrimination to households requesting rent, mortgage or utility assistance. Caps are determined by fair market rents/rent reasonableness.</td>
</tr>
<tr>
<td>Describe all of the criteria that will be used to select applications and the relative importance of these criteria.</td>
<td>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.</td>
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<tr>
<td>If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)</td>
<td></td>
</tr>
<tr>
<td>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)</td>
<td>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 required 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.</td>
</tr>
<tr>
<td>Describe how resources will be allocated among funding categories.</td>
<td>The application required all housing 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. Facilities 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.</td>
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<tr>
<td>Describe threshold factors and grant size limits.</td>
<td>HIV Care Connect Region funding formula is based on an annual award amount that is based on the morbidity data. All HIV Care Connect are increased based on the increase in housing costs 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 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.</td>
</tr>
</tbody>
</table>
**What are the outcome measures expected as a result of the method of distribution?**

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 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.

<table>
<thead>
<tr>
<th>14</th>
<th>State Program Name:</th>
<th>HOPWA Tenant Based Rental Assistance</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Funding Sources:</td>
<td>HOPWA</td>
</tr>
<tr>
<td></td>
<td>Describe the state program addressed by the Method of Distribution.</td>
<td>In 2015, Winnebago County Health Department application described the 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 at 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. The Department plans to expand the use of tenant based rental assistance to other Project sponsors and entities around the State.</td>
</tr>
<tr>
<td><strong>Describe all of the criteria that will be used to select applications and the relative importance of these criteria.</strong></td>
<td>Winnebago County Health Department is the only project sponsor that has expressed interest in providing TBRA to persons residing in northwestern Illinois. Winnebago County Health Department HIV Care Connect region will be providing tenant based housing assistance in the next current year. Winnebago County Health Department submitted an application of their intent to explore the option of providing TBRA to persons residing in northwestern Illinois. Changes in the use of STRMU pose unique challenges in different areas of Illinois. There continues to 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. The Department wish to extend the tenant based housing assistance program to other areas of the State in 2017. 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.</td>
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<td></td>
</tr>
<tr>
<td><strong>If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>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)</td>
<td>The selection process will be opened to the entire State. The Department allows the HIV Care Connect Lead Agents to subcontract with local service providers for housing services. The Department recently will holding meeting with lead agents, giving instructions on how to include faith-based organizations as entities eligible to apply for funding.</td>
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</tr>
<tr>
<td>Describe how resources will be allocated among funding categories.</td>
<td>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 required 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.</td>
<td></td>
</tr>
<tr>
<td>Describe threshold factors and grant size limits.</td>
<td>Project Sponsors that are located in the State of Illinois can submit a request for providing Tenent based housing assistance. Project Sponsors will receive funding to service persons living HIV/AIDS who are in need of housing and supportive services.</td>
<td></td>
</tr>
</tbody>
</table>
What are the outcome measures expected as a result of the method of distribution?

<table>
<thead>
<tr>
<th>15</th>
<th>State Program Name:</th>
<th>National Housing Trust Fund (NHTF)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Funding Sources:</td>
<td>Housing Trust Fund</td>
</tr>
</tbody>
</table>

Decent safe and affordable housing.
| Describe the state program addressed by the Method of Distribution. | Multi-family rental housing development (new construction or acquisition/rehabilitation. IHDA will not allow refinancing of existing debt as an eligible activity in the 2017 NHTF Allocation Plan.

The Illinois Housing Development Authority (IHDA) has been designated by the Governor as the administering State agency for the 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. The State does not intend to use subgrantees in the 2017 funding cycle.

If the national funding level falls below $1 Billion, 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. IHDA will not allow refinancing of existing debt as an eligible activity in the initial-year 2016 Allocation Plan of NHTF, and reserves said right in following years.

**Geographic Diversity:** The State will distribute HTF funds statewide, subject to the Affordable Housing Planning and Appeal Act to the prioritizing applications that are consistent with the 2015-2019 Consolidated Plan, Section AP-50 Geographic Distribution. IHDA will strive to achieve maximum geographic diversity based on statewide applications and where applicable, aligning set-asides associated with other programs providing non-federal, leveraged funding to the NHTF, rather than establish geographic set asides under the NHTF. In an effort to increase geographic diversity, IHDA provides application workshops in different locations throughout the state.

**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.

**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.

**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 |
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 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.

<table>
<thead>
<tr>
<th>If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Eligible NHTF recipients include for profit and non-profit corporations, and governmental entities, including public housing authorities. There will be an open application process until all funds are committed. In addition to the above, please refer the NHTF appendices attached to this document and see IHDA’s website (<a href="http://www.ihda.org">www.ihda.org</a>) for additional information.</td>
</tr>
<tr>
<td>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)</td>
</tr>
<tr>
<td>---</td>
</tr>
<tr>
<td>Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)</td>
</tr>
</tbody>
</table>
Describe how resources will be allocated among funding categories.

If the national funding level falls below $1 Billion, 100% of program funds must be used to benefit Extremely Low-Income (ELI) households, defined as 30% of area median income or less. The 2017 Illinois NHTF allocation is $7,163,487. There is also allowance to use up to 10% of all funds ($716,348.70 in 2017) 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 Illinois/NHTF program funds, but will strive to achieve maximum geographic diversity in its final funding decisions.

Describe threshold factors and grant size limits.

Maximum Per Unit Development Subsidy Costs

**Grand Total Hard Cost Limits**: A Project's grand total hard costs, as calculated in the Common Application, are limited to the sum of the products of the hard cost limit by bedroom type and the number of units, by bedroom type, in the Project. See the attached "Grand Total Hard Costs" for a breakdown of cost per bedroom size regarding the City of Chicago, and Chicago Metropolitan Areas; Other Metro; and Non-metro areas. Maximum allowable for 4+bedroom size in City of Chicago and Chicago Metro Area is $325,000.
<table>
<thead>
<tr>
<th>What are the outcome measures expected as a result of the method of distribution?</th>
<th>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 Action Plan goals.</th>
</tr>
</thead>
<tbody>
<tr>
<td>16</td>
<td>State Program Name: Revolving Loan Fund Activities</td>
</tr>
<tr>
<td>Funding Sources:</td>
<td>CDBG</td>
</tr>
<tr>
<td>Describe the state program addressed by the Method of Distribution.</td>
<td>During the State’s 2013 Monitoring Review, HUD determined that DCEO failed to demonstrate eligible use of Revolving Loan Funds by Units of Local Governments. Based upon CPD Notice 04-11 and Part 570, HUD advised the State to close inactive Revolving Loan Fund Accounts; and in those that are still revolving verify that the use of such funds is eligible, per the original intent of the RLF that was formed. In order to meet these requirements and remedy HUD’s 2013 Monitoring Finding, the State will close locally held Revolving Loan Funds in a manner where funds may be used for other CDBG-eligible activities. HUD has provided technical assistance to the State to navigate this process</td>
</tr>
</tbody>
</table>
### Describe all of the criteria that will be used to select applications and the relative importance of these criteria.

Applications must meet a National Objective and all requirements as outlined in 2CFR 200. Eligible activities include:

- Economic Development as outlined in the 2017 State of Illinois CDBG Guidebook *except that Leverage is not required.*
- Public Infrastructure as outlined in the 2017 State of Illinois CDBG Guidebook and *Activity Delivery and Design activities as part of the overall project.*
- Housing Rehabilitation as outlined in the 2017 State of Illinois CDBG Guidebook and *activities defined in the following HUD IDIS Matrix Codes:*
  - 03K - Street Improvements - including street drains, storm drains, curb and gutter work, installation of street lights or signs.
  - 03L - Sidewalks - including sidewalk improvements, and installation of trash receptacles, trees, benches or lighting when part of a streetscape project.
  - 14E - Rehabilitation: Publicly or Privately Owned Commercial/Industrial - improvements to the exterior of a commercial building (generally referred to as "facade improvements") or to the correction of code violations.

### If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)

Application Guidelines and forms can be found at: [http://www.illinois.gov/dceo](http://www.illinois.gov/dceo)
<table>
<thead>
<tr>
<th>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)</th>
<th>N/A</th>
</tr>
</thead>
<tbody>
<tr>
<td>Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)</td>
<td>N/A</td>
</tr>
<tr>
<td>Describe how resources will be allocated among funding categories.</td>
<td>Eligible applicants may choose to utilize funds previously held for Revolving Loan Fund activities for an eligible activity as outlined above.</td>
</tr>
<tr>
<td>Describe threshold factors and grant size limits.</td>
<td>Eligible applicants are limited to utilizing available funds for no more than two eligible activities.</td>
</tr>
<tr>
<td>What are the outcome measures expected as a result of the method of distribution?</td>
<td>Unknown at this time.</td>
</tr>
</tbody>
</table>
Discussion:
AP-35 Projects – (Optional)

Introduction:

This page will be completed as projects are added.

<table>
<thead>
<tr>
<th>#</th>
<th>Project Name</th>
</tr>
</thead>
</table>

Table 9 – Project Information

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

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. Since the CDBG program limits the use of 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 its HOME Program funding for rental housing through its rental housing development program. To some extent, the expenditure of CDBG, HOME Program and other program funds on housing programs is driven by the market. The Authority’s impact in opportunity areas within the State is limited by applications for funding in these areas, but is interested in partnering with other community organizations. This is actually done primarily through the Low Income Housing Tax Credit program.

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

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

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

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

To address obstacles and address underserved needs IHDA continues processing Housing Affordability Impact Notes for all relevant proposed State legislation. The Illinois Housing Locator system, ILHousingSearch.org continues to operate, allowing landlords to list available rental properties to prospective renters.

IHDA continues working 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 1,175 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. The national Housing Trust Fund will provide rental units affordable to extremely low income households at 30% or less of local AMI across the State.

**Affordable Housing Planning Appeals Act:** IHDA, as the administering agency of the AHPAA, produces the non-exempt local communities list every five years to identify and assist municipalities throughout the state to complete and submit affordable housing plans. These efforts include an AHPAA handbook for local officials and administrators.
AP-38 Project Summary

Project Summary Information
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?

No

Available Grant Amounts

Since authorization for the Section 108, the State of Illinois has not received any fundable applications. Consequently, for 2018 the State will not be funding this activity, and instead focusing its' resources on a broader Economic Development grant program. The State feels the Economic Development grants will be a more useful tool to businesses than Section 108 Loans.

Acceptance process of applications

N/A
AP-45 Community Revitalization Strategies – 91.320(k)(1)(ii)

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

State’s Process and Criteria for approving local government revitalization strategies
AP-50 Geographic Distribution – 91.320(f)

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

The State has identified very and extremely low-income households as one of the priority populations under the Consolidated Plan. The 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 Block Grant Program funding is only available to communities that are not direct Entitlements (receive their own direct CDBG allocation).

Beginning in 2017, the State has added the City of Galesburg (zipcode 61401 city limits only) as a Local Target Area for the HELP (Lead) Pilot Project.

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

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

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

Geographic Distribution

<table>
<thead>
<tr>
<th>Target Area</th>
<th>Percentage of Funds</th>
</tr>
</thead>
<tbody>
<tr>
<td>Statewide Distribution</td>
<td>100</td>
</tr>
</tbody>
</table>

Table 10 - Geographic Distribution
Rationale for the priorities for allocating investments geographically

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

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

Introduction:

The tables in this section include combined goals from the different HUD-CPD formula grants. For the purpose of this section, the term "affordable housing" is defined in the HOME regulations at 24 CFR 92.252 for rental housing and 24 CFR 92.254 for homeownership. These estimates do not include the provision of emergency shelter, transitional shelter, or social services.

<table>
<thead>
<tr>
<th>One Year Goals for the Number of Households to be Supported</th>
</tr>
</thead>
<tbody>
<tr>
<td>Homeless</td>
</tr>
<tr>
<td>Non-Homeless</td>
</tr>
<tr>
<td>Special-Needs</td>
</tr>
<tr>
<td>Total</td>
</tr>
</tbody>
</table>

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

<table>
<thead>
<tr>
<th>One Year Goals for the Number of Households Supported Through</th>
</tr>
</thead>
<tbody>
<tr>
<td>Rental Assistance</td>
</tr>
<tr>
<td>The Production of New Units</td>
</tr>
<tr>
<td>Rehab of Existing Units</td>
</tr>
<tr>
<td>Acquisition of Existing Units</td>
</tr>
<tr>
<td>Total</td>
</tr>
</tbody>
</table>

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

Discussion:

Production of 42 new units includes anticipated units through HOME Multifamily

Rehab of 29 existing units includes anticipated units through HOME Multifamily

Production of 25 new units includes anticipated units through National Housing Trust Fund

Rehab of 18 existing units includes anticipated units through National Housing Trust Fund

Rehab of 130 existing units includes anticipated units through CDBG single-family Housing Rehabilitation

Rental assistance includes the ESG goal of 1,500 households assisted through rapid rehousing and 488 assisted through homeless prevention

Rental assistance included the HOPWA goal of households assisted through short-term rent and
mortgage assistance, TBRA, and units provided through HIV/AIDS housing facilities
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

As of May 22, 2018, HUD informed IHDA that the PHAs that it had designated as “troubled” under the State of Illinois’ Consolidated Plan were: Alexander County Housing Authority, Danville Housing Authority, Peoria Housing Authority, and Vermillion County Housing Authority. The Danville Housing Authority and Vermillion County Housing Authority are designated as SEMAP “troubled”. The State can, upon local request, provide outreach and technical assistance in an effort to better assess and evaluate options for improving operations, resolving non-compliance problems, and identifying other housing-related needs and issues.

Discussion:

Due to increased emphasis on further meeting the housing needs of identified, 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’s definition of “chronically homeless” assists grantees in focusing their Continuum of Care homeless programs on persons with the longest histories of homelessness, who often also have the highest need.

Under the 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. The 2018 State ESG Allocation is $4,612,743.

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, in addition to using it as 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 an implementation plan to help coordinate agency services and ease the transition process for Class Members. The Consent Decree and Nursing Home Deflection Program work to prevent future people from entering the institutional system if it is unwanted. DHS’ Williams Consent Decree Parties are also working on closing the front door to Institutes for Mental Disease and preventing inappropriate institutionalization in the future.

The ESG program expects to provide assistance to 1,500 homeless households in 2018

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 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 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. The ESG program expects to assist 16,000 Homeless Persons through overnight shelters in 2018.

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.

State efforts to maintain PSH include the use of national HTF funds for the construction and rehab of PSH units. The State's Illinois Housing Search website also provides permanent supportive housing to persons experiencing or at risk of homelessness through its Statewide Referral Network units.

**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 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 Developmental Disability (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 (DMH) expanded permanent supportive housing to include project-based/clustered housing options using existing housing developments in Cook County. IDHS/DMH successfully implemented a Clustered Housing Model pilot on Chicago's north side of PSH units located in close proximity, in a building or buildings closely situated, with 24-hour peer support staff; a second Clustered Housing Model was implemented using a scattered sites, on Chicago’s south side, targeting Williams Class Members deemed “Unable to Serve” (class members recommended for community transition, but the selected community provider cannot meet their clinical/support needs for one or more of the following service needs: financial, medical, medical/diabetes, medication management and/or psychiatric/behaviors). DMH conducted a six-tier initiative analyzing this population, to determine the reasons why certain Class Members are being categorized as Unable to Serve and what might be recommended to reduce that number. DMH also commissioned UIC to do a study on clients who have returned to IMDs to better understand those circumstances.

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.

The State's Illinois Housing Search website also provides permanent supportive housing to persons experiencing or at risk of homelessness through its Statewide Referral Network units.

**Discussion**

The ESG Program provides homeless prevention assistance funding to its sub-recipients on a two-year cycle under the Consolidated Plan. The ESG Program expects to provide homeless prevention assistance to 945 households in program years 2017 and 2018, using 2017 funding.

Emergency Solutions Grants aim to provide services to aid homeless and at risk of homelessness persons and families. Services funded includes: 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.

See the AP 10 Section of this document for information on the State's Discharge Policy planning efforts.
### AP-70 HOPWA Goals – 91.320(k)(4)

<table>
<thead>
<tr>
<th>Goal Description</th>
<th>Number</th>
</tr>
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<tbody>
<tr>
<td>Short-term rent, mortgage, and utility assistance to prevent homelessness of the individual or family</td>
<td>390</td>
</tr>
<tr>
<td>Tenant-based rental assistance</td>
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<td>Units provided in permanent housing facilities developed, leased, or operated with HOPWA funds</td>
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<tr>
<td>Units provided in transitional short-term housing facilities developed, leased, or operated with HOPWA funds</td>
<td>76</td>
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<tr>
<td>Total</td>
<td>501</td>
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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 the 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) Other 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, ILHousingSearch.org continues to operate, allowing landlords to list available rental properties to prospective renters. By May, 2018, 7,600 landlords had registered over 124,000 units throughout the state.

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 1,175 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.

The national Housing Trust Fund will provide rental units affordable to extremely low income households at 30% or less of local AMI across the State.

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. **Accessibility:** 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. The national Housing Trust Fund will allow for increased production and rehab of additional units affordable to households at or below 30% AMI, and thus increase the State's inventory of PSH.
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.

IHDA’s Office of Housing Coordination Services (OHCS) in its Strategic Planning and Reporting Division (SPAR) 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 (competitive tax credits) 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 (non-competitive tax credits) can be used for rehabilitation projects and when 50 percent or more of a project’s 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.

The national Housing Trust Fund expands the State's ability to provide Extremely low-income households affordable rental housing across the State.

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 157 supportive living facilities sites (11,770 units) located throughout Illinois.

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

HUD's final rule of July 16, 2015 revised and detailed requirements for HUD grantees, PHAs, and funding recipients to “affirmatively further fair housing”, a certification signed annually by all HUD grantees. The rule clarifies not only what actions are considered acceptable, but also when the old Analysis of Fair Housing Impediments would be due. Now to be known as the Assessment of Fair Housing (AFH), it is to be tied to the Five-Year Consolidated Plan. PHAs are required to develop their own individual plans, or can become part of their jurisdiction's AFH. For the majority of PHAs, that would be the State's AFH, coordinated by IHDA. The rule also discusses disparate impact, de-concentration of poverty, and opportunity areas, but states little about persons with disabilities, a growing area of concern with the realm of fair housing issues. On January 5, 2018, HUD extended the deadline for submission of an AFH by local government program participants until the next Five-Year Plan due after October 31, 2020. HUD has also not issued the AFH Assessment tool for states. Thus, States are not currently required to submit an AFH, but must continue to comply with existing obligations to affirmatively further fair housing. Until the State is required to submit an AFH, it will continue to provide its AFFH Consolidated Plan Certification, and continue to report on the State's actions to address fair housing impediments in the
State's Consolidated Plan Annual Performance reports, in compliance with CFR 24 91.520(a).

IHDA has prepared for HUD’s eventual publication of State Assessment Tool and has made the following AFFH actions:

1. Establishment of Opportunity Areas (see "Discussion" below),
2. Approved changes in the QAP making 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 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

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

Illinois’ Lead Safe Housing Advisory Council (LSHAC) is composed of advocacy groups, public health, state agency and industry representatives. The work of the LSHAC includes regulatory and legislative recommendations in the areas of screening and prevention, lead safe work practices, education, and funding for the remediation/rehabilitation of housing containing lead poisoning hazards. The Lead Poisoning Prevention Act (Public Act 94-0879 sets pre-emptive measures to prevent childhood lead-poisoning, including increased inspections of buildings suspected of containing lead hazards. The LPPA includes provisions barring owners of residential buildings who 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 became law, establishing the window
replacement (CLEAR-WIN) program to prevent future cases of lead poisoning by assisting residential property owners reduce lead-paint hazards through window replacement in two pilot areas. An evaluation of CLEAR-WIN pilot program activities in Peoria and the Englewood community in Chicago by the University of Illinois/Chicago (UIC) for HUD exhibited a successful lead dust reduction of over 90% in the homes serviced.

The Illinois Department of Public Health (IDPH) convened the Lead Poisoning Elimination Advisory Council (LPEAC) to assist IDPH in developing the State’s Lead Program Healthy Homes Strategic Plan, guiding lead poisoning elimination initiatives along with recommendations on enhancing participation from communities statewide. IDPH, along with the LPEAC, updated its Healthy Homes Strategic Plan to reflect the State’s on-going, multi-faceted approach to lead poisoning prevention and expanding Healthy Homes issues.

Significant changes strengthening the Illinois Lead Poisoning Prevention Act (LPPA) include classifying pregnant persons with elevated blood lead levels 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 data disclosure. IDPH is able to issue Emergency Stop Work Orders when public health is in jeopardy as the result of improper work activities disturbing lead bearing surfaces. Enforcement capabilities expanded in cases where violations of the LPPA and the Lead Poisoning Prevention Code (LPPC) have occurred, with penalty provisions bringing Illinois in compliance with U.S. EPA requirements for all authorized State programs. 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.

The Governor's Cabinet on Children and Youth convened October 3, 2016, identifying three initiatives designed to benefit the safety and well-being of Illinois’ youth. Reducing the Childhood Lead Burden, a primary focus under the Cabinet, is designed to Improve Identification and Response to Lead-Poisoning and Lead Hazards; Ensuring Safe Homes; Developing Data Driven Solutions; Connecting to Social Services; and Prevention and Education. The concerted, eighteen month initiative has resulted in enhanced codes, and concerted, inter-agency response by IDPH, IHDA and DCEO. The State’s 2019 Fiscal Year budget includes an additional $15,000,000 For the CLEAR-WIN program.

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

State of Illinois operates a variety of anti-poverty efforts coordinated with employment/training, housing assistance efforts, and other services. A brief summary follows:

1. The HHS-funded Community Services Block Grant (CSBG) Program is the major federal-funded anti-poverty program, using Community Action Agencies (CAAs) to coordinate these anti-poverty efforts at the local level. In coordination with other subject-specific programs, efforts are geared to enabling low-income persons to become more self-sufficient. It is administered by DCEO at the State level, which
funds the statewide network of CAAs and related organizations on an annual basis, contingent on federal funding. Uses of CSBG funds include the following: economic development; education; emergency assistance; health; housing; income management; linkages; nutrition; and self-sufficiency.

IHDA funds a number of local CAAs for housing rehabilitation programs.

(2) IDHS administers most of the State’s homeless assistance services programs. These have included the State-funded Homeless Prevention Program, and the Emergency & Transitional Housing Program, both of which have been partially, if not fully funded through the State’s Affordable Housing Trust Fund as well as with General Revenue Funds. It also administers the HUD-funded Emergency Solutions Grants Program, assisting local homeless services agencies with rehabilitation, operation/maintenance costs, essential services, and homeless prevention/rapid rehousing programs.

(3) DCEO administers the Low-Income Home Energy Assistance program (LIHEAP) as well as the Illinois Home Weatherization Assistance Program (IHWAP). Both provide utility subsidy assistance and weatherization improvements to low-income homeowners and renters.

(4) DCEO administered the DOL-funded Workforce Investment and Opportunity Act funding, which provides federal funding to workforce development boards (WDBs) across the state for local employment and job training programs. The State coordinated its efforts in this area by establishing Illinois Employment & Training Centers, which include staffing from WDBs, IDES-unemployment assistance and employment data and projections, and IDHS, to provide a one-stop shop for human services. IHDA also provided this information for LIHTC applicants who were working in Community Revitalization Areas to encourage them to include an economic development/employment and training component in their local plans.

(5) IHDA continued to administer approximately 30% of the State’s Section 8 Project-Based Assistance properties since the program’s inception, most of which has partially or wholly financed those developments. IHDA regularly works with owners of “expiring properties” to encourage renewal of these rental assistance contracts by providing refinancing and rehabilitation assistance, often through tax-exempt bond financing and 4% Low Income Housing Tax Credits (LIHTCs) as well as HUDs/Treasurys Risk Sharing Program.

(6) IHDA administers the State-funded Rental Housing Support Program (RHSP), which targets rental assistance through Local Administrative Agencies (LAAs) to households at 15-30% area median income. Funds were frozen in 2015 due to litigation that was resolved in December 2015. Funds under RSHP cannot be drawn or accessed until an appropriation is passed by the Illinois General Assembly. RHSP also includes Long-Term Operating Support (LTOS). A total of 1,175 households are receiving rental assistance under the combined programs. The Section 811 Program is specifically targeted to persons with disabilities who are coming out of institutional facilities and searching for community-based
housing.

**Actions planned to develop institutional structure**

The following actions are expected over the next 3 years:

1. Regular meetings of the Illinois Housing Task Force, its Executive Committee, its Interagency Committee, and related Working Groups to develop and implement the State’s Annual Comprehensive Housing Plan.
2. Combined meetings of the SPAR/OHCS Advisory Committee, Lt. Governor’s Rural Affairs Council (twice a year) and Rural Partners (as needed).
3. 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).
4. Development of informational materials on existing and revised Federal and State housing and support services programs via: 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.

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

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 Committee.

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 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 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.

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.

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.

IHDA 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:

Under “Actions planned to foster and maintain affordable housing” other proposed IHDA actions:

1. Establishing a Limited English Proficiency Policy and Implementation Plan
2. Ongoing administration of the Affordable Housing Planning and Appeals Act Program
3. Providing targeted training on Reasonable Accommodations policy and practice; and
4. Continue inclusion of the 30% preference for Special Needs Tenants under IHDA’s Rental Housing Support Program; and
5. Fund technical assistance to IHDA property managers on HUD’s new Equal Access Rule for LGBT persons
6. Supporting uncapped use of national Housing Trust Fund monies to be used for operating rental/assistance for housing for extremely low income households
Program Specific Requirements

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

Introduction:

HOME funds target low- and very-low-income households. Funds will be initially targeted statewide to those areas that do not receive direct allocations of HOME Program funds from HUD. Under the 2015-2019 Consolidated Plan, IHDA is only utilizing HOME funding for rental housing development/rehabilitation.

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 2,000,000

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. 70.00%

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, 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:

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 disbursed to or for the benefit of the Borrower, the Borrower shall provide such funds to satisfy the Recapture as requested by the Lender, unless recapture is due solely to the actions 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.

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

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<tr>
<td>&gt;$40,000</td>
<td>15 Years</td>
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</tbody>
</table>

3. A description of the guidelines for resale or recapture that ensures the affordability of units acquired

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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. Under the 2015-2019 Consolidated Plan, IHDA is only utilizing HOME funding for rental housing development/rehabilitation.

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 throughout the 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 forgiven 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 disbursed to or for the benefit of the Borrower, the Borrower shall provide such funds to satisfy the recapture as requested by the Lender, unless such Recapture is due solely to the actions 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:

For IHDA funding, any proposed rehabilitation project must receive initial approval as part of the Preliminary Project Assessment (PPA). Once approved, the sponsor will submit a full "Common Application" to the Authority including a Property Needs Assessment (PNA), appraisal, and environmental reports to complete the HUD ERR. The inclusion of a PNA indicates that rehabilitation is the primary activity of the proposed development. IHDA's "Standards for Architectural Planning
and Construction" (APCS) and the "Common Application" define the threshold factors and cost
parameters for rehab projects, in addition to those for new construction. As part of the PPA, a
proposed project must also indicate whether, and how, the proposed investment will change the
number of affordable units, and unit affordability. The PPA must be approved before a proposed
project may be submitted via the "Common Application". Also see HOME Addendums 1 (HOME
Provisions) and 2 HOME Rehabilitation Standards) of IHDA's "Standards for Architectural Planning
and Construction".

Any proposed HOME refinance would be subject to IHDA's application process and subject to the
Financial Feasibility review contained within IHDA "Multi-Family Common Application", to ensure
compliance with Multi-family underwriting guidelines. The Financial Feasibility component of the
"Common Application" assesses whether disinvestment has occurred, and whether the proposed
project has the ability to serve the project's targeted population in the long-term. The PPA, PNA,
Standard for Construction Cost Estimate (SCCE), "Mandatory Application Checklist", "MF Common
Application", the APCS and other relevant HOME application manuals, guidelines, and other
publications describing the application criteria are found on the IHDA website
at: https://www.ihda.org/developers/dev-resource-center.

Periods of affordability comply with 24CFR 92.252: Rehabilitation of existing housing per unit of
HOME funds under $15,000 - 5 years minimum affordability; $15,000 - $40,000 10 years minimum
affordability; over $40,000 or rehabilitation involving refinancing - 15 years minimum affordability.

HOME funds cannot be used to refinance multifamily loans made or insured by any federal program,
including the Community Development Block Grant Program

**Emergency Solutions Grant (ESG)**

Reference 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 subrecipients 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 set forth 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

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

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

☑ Applications submitted by eligible recipients

2. If distributing HTF funds through grants to subgrantees, describe the method for distributing HTF funds through grants to subgrantees and how those funds will be made available to state agencies and/or units of general local government. If not distributing funds through grants to subgrantees, enter “N/A”.

N/A

3. If distributing HTF funds by selecting applications submitted by eligible recipients,

a. Describe the eligibility requirements for recipients of HTF funds (as defined in 24 CFR § 93.2). If not distributing funds by selecting applications submitted by eligible recipients, enter “N/A”.

Eligible recipients include an organization, agency, or other entity (including a public housing agency, or a for-profit entity or a nonprofit entity) that receives HTF assistance from a grantee as an owner or developer to carry out an HTF-assisted project. The requirements below are verified during the review process and a certification is issued by the IHDA Development Team. A recipient must:

b. Describe the grantee’s application requirements for eligible recipients to apply for HTF funds. If not distributing funds by selecting applications submitted by eligible recipients, enter “N/A”.

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IHDA will use its Multifamily Financing “Common Application” as the major application format for national HTF rental housing projects, the same one used for the LIHTC and HOME programs, along with supplemental information required by program rules (see attached Permanent Supportive Housing Development Program Request for Application). 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. National HTF funds will only be applied to units restricted to tenants at 30% AMI or below. The balance of the units that are not 30% AMI or below will be paid for with other IHDA or leveraged sources.

c. Describe the selection criteria that the grantee will use to select applications submitted by eligible recipients. If not distributing funds by selecting applications submitted by eligible recipients, enter “N/A”.

If an applicant meets the mandatory thresholds above, IHDA will review eligible recipients in accordance with CFR 91.320 (k)(5)(i), which will include supplemental information required by program rules (see Permanent Supportive Housing Development Program RFA). In addition to the review of mandatory requirements, IHDA’s process will include an initial completeness/eligibility scoring, underwriting, site and market review, peer review, internal Loan Committee and IHDA Board approval.

d. Describe the grantee’s required priority for funding based on geographic diversity (as defined by the grantee in the consolidated plan). If not distributing funds by selecting applications submitted by eligible recipients, enter “N/A”.

The State will distribute HTF funds statewide, including the City of Chicago, Chicago Metro, Other Metro, Non-Metro and municipalities subject the Affordable Housing Planning and Appeal Act to the prioritizing applications that are consistent with the 2015-2019 Consolidated Plan, Section AP-50 Geographic Distribution. The Authority puts a high value on quality location of projects and availability of resources and access to amenities. IHDA will strive to achieve maximum geographic diversity based on statewide applications and, where applicable, aligning set-asides associated with other programs providing non-federal, leveraged funding to the NHTF, rather than establish geographic set asides under the NHTF. In an effort to increase geographic diversity, IHDA provides application workshops in different locations throughout the state.

e. Describe the grantee’s required priority for funding based on the applicant’s ability to obligate HTF funds and undertake eligible activities in a timely manner. If not distributing funds by selecting applications submitted by eligible recipients, enter “N/A”.


OMB Control No: 2506-0117 (exp. 06/30/2018)
As stated in the attached RFA Section 3, Paragraph N, the Authority will evaluate the Development Team’s capacity to successfully complete and manage the Project. Applicants who fail to meet this mandatory criteria will be disqualified and will not be scored during the final evaluation phase. Applications must include the following for the Authority to evaluate the experience and capacity of the development team:

Organizational Flow Chart

- The Application must include a full organizational chart reflecting all entities within the proposed Owner down to individuals including percentages of ownership

Identity of Interest Certification

- The Application must include an Identity of Interest form for the Sponsor

Development Team Certification

- The Application must include certifications for the proposed owner, general contractor, property manager, and architect, inclusive of all pending, under construction, or completed Projects in any state, including their present status and expected completion date. The Development Experience Certification forms are available on the Authority’s Website

Unacceptable Practices

The Authority may deny any Project in which any Participant in the Development Team has failed to demonstrate ongoing proficiency with affordable and supportive housing programs. The Applicant may include in the Application an explanation of the circumstances surrounding the unacceptable practice and the roles of each of the Participants. Examples of unacceptable practices include but are not limited to:

- A Participant is affiliated with existing developments which have been cited for material and/or continuing, but curable, noncompliance. Material noncompliance exists when a party exhibits a continual pattern of noncompliance, or when a party demonstrates an inability or an unwillingness to resolve noncompliance in a timely manner
- A Participant (including any affiliates) has experienced any events of foreclosure or failed to perform under the terms of a workout agreement over the past three (3) years
- A Participant (including any affiliates) has declared bankruptcy over the past three (3) years
- Any Participant (including any affiliates) has a mortgage default or arrearage of three months or more within the last three (3) years
- A Participant that has failed to pay any fee or expense due to the Authority, including
outstanding compliance monitoring fees in the past three (3) years

- Any liens or other claims exist against property owned by Owner (including any affiliates) for which the Owner has failed to resolve a public filing such as a lien or a judgment
- The Owner (including any affiliates) has been debarred or received a limited denial of participation in the past three (3) years by any federal or state agency from participating in any development program
- A Participant that has materially misrepresented facts on any request for Authority resources

f. Describe the grantee’s required priority for funding based on the extent to which the rental project has Federal, State, or local project-based rental assistance so that rents are affordable to extremely low-income families. If not distributing funds by selecting applications submitted by eligible recipients, enter “N/A”.

As stated in the attached RFA Section 4, Paragraph B, projects that provide project-based rental or operating assistance will be awarded up to twenty-five (25) points based on the number of units assisted and the length of committed assistance. Units can be assisted with 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.

g. Describe the grantee’s required priority for funding based on the financial feasibility of the project beyond the required 30-year period. If not distributing funds by selecting applications submitted by eligible recipients, enter “N/A”.

As stated in the attached RFA Section 3, Paragraph 9, all 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. Applicants who fail to meet this mandatory criteria will be disqualified and will not be scored during the final evaluation phase.

As stated in the attached RFA Section 5, Paragraph H, Projects will be required to execute a Regulatory Agreement with the Authority, whereby the Owner shall agree to maintain unit affordability, and serve the targeted populations, for a minimum 30-year period
h. Describe the grantee’s required priority for funding based on the merits of the application in meeting the priority housing needs of the grantee (such as housing that is accessible to transit or employment centers, housing that includes green building and sustainable development features, or housing that serves special needs populations). If not distributing funds by selecting applications submitted by eligible recipients, enter “N/A”.

As stated in the attached RFA Section 3, Paragraph B, all applications must include a certification of consistency with the Consolidated Plan for the Project. The projects must target populations and prioritize activities that are consistent with the States 2015-2019 Consolidated Plan and the State’s Comprehensive Planning Act. 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. Applicants who fail to meet these mandatory criteria will be disqualified and will not scored during the final evaluation phase.

Projects will also be scored on the following items that meet the housing needs of the State. See attached RFA Section 4 for information on Application Scoring Criteria.

- SRN Units - Up to ten (10) points
- Universal Design - Up to ten (10) points
- Green Design and Energy Efficiency - Up to five (5) points
- Access to Transportation - Up to ten (10) points
- Neighborhood Characteristics and Amenities - A maximum of five (5) points

i. Describe the grantee’s required priority for funding based on the extent to which the application makes use of non-federal funding sources. If not distributing funds by selecting applications submitted by eligible recipients, enter “N/A”.

Projects which are able to commit other non-federal funds as part of their project financing will be awarded up to twenty-five (25) points. 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.

4. Does the grantee’s application require the applicant to include a description of the eligible activities to be conducted with HTF funds? If not distributing funds by selecting applications submitted by eligible recipients, select “N/A”.

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5. Does the grantee’s application require that each eligible recipient certify that housing units assisted with HTF funds will comply with HTF requirements? If not distributing funds by selecting applications submitted by eligible recipients, select “N/A”.

Yes

6. **Performance Goals and Benchmarks.** The grantee has met the requirement to provide for performance goals and benchmarks against which the grantee will measure its progress, consistent with the grantee’s goals established under 24 CFR 91.315(b)(2), by including HTF in its housing goals in the housing table on the SP-45 Goals and AP-20 Annual Goals and Objectives screens.

Yes

7. **Maximum Per-unit Development Subsidy Amount for Housing Assisted with HTF Funds.** Enter or attach the grantee’s maximum per-unit development subsidy limits for housing assisted with HTF funds.

The limits must be adjusted for the number of bedrooms and the geographic location of the project. The limits must also be reasonable and based on actual costs of developing non-luxury housing in the area.

If the grantee will use existing limits developed for other federal programs such as the Low Income Housing Tax Credit (LIHTC) per unit cost limits, HOME’s maximum per-unit subsidy amounts, and/or Public Housing Development Cost Limits (TDCs), it must include a description of how the HTF maximum per-unit development subsidy limits were established or a description of how existing limits developed for another program and being adopted for HTF meet the HTF requirements specified above.

The Housing Trust Fund 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 Qualified Allocation Plan (QAP). These limits will be based on hard construction costs, and are adjusted by bedroom size and location. Location factors in to the variance between the Chicago and metro set asides and separating other metro and non-metro set asides.

These standards were established by an analysis of the current Construction Cost Database for issuance with the 2016-2018 QAP. This analysis showed the largest variance between Chicago and metro versus other metropolitan areas.
other metro and non-metro. There was a smaller variance between Chicago and metro and a larger variance between Chicago and the remaining regions of the State. IHDA will provide non-federal funds to areas where needed, to bridge gaps between maximum per-unit costs under the national HTF and actual construction cost within IHDA's Cost Limits. See attached "20___ Hard Cost Limits for HIDA's Cost Limits.

The total cost per unit takes into considerations soft costs, which are based on the statewide cap, and will not exceed 20% of allowable hard costs for this program. The total cost will be based on geographic location as explained above.

8. **Rehabilitation Standards.** The grantee must establish rehabilitation standards for all HTF-assisted housing rehabilitation activities that set forth the requirements that the housing must meet upon project completion. The grantee’s description of its standards must be in sufficient detail to determine the required rehabilitation work including methods and materials. The standards may refer to applicable codes or they may establish requirements that exceed the minimum requirements of the codes. The grantee must attach its rehabilitation standards below.

In addition, the rehabilitation standards must address each of the following: health and safety; major systems; lead-based paint; accessibility; disaster mitigation (where relevant); state and local codes, ordinances, and zoning requirements; Uniform Physical Condition Standards; and Capital Needs Assessments (if applicable).

IHDA uses the attached Architectural Planning and Construction Standards (APCS), to evaluate all rehabilitation projects. The APCS is a comprehensive reference for owners, developers, architects and contractors in the design and construction of quality affordable housing. IHDA uses the standards to evaluate plans, specifications and other relevant data of the proposed new construction, rehabilitation and adaptive reuse of existing buildings.

- Applicable State and local code, ordinances and zoning requirements
- Health and Safety
- Requirements of useful life of major systems
- Lead based Paint Requirements
- Accessibility Stand which must be met
- Disaster mitigation requirements
- State and Local Codes, Ordinance, and Zoning Requirements
• Uniform Physical Condition Standards

Disaster Mitigation - The State of Illinois does not maintain a statewide adopted building code. Each local governmental unit (municipality or county) adopts its own individual building or other administrative code. IHDA relies on these local Authorities Having Jurisdiction (AHJ) to provide plan review and issue building permits per their adoptive standards. If there is an area which does not have an adopted standard, our APCS document indicates the building shall be constructed to meet the 2015 version of the International Building Code. The use of standard building codes, by either the AHJ or IHDA referenced standard, ensures facilities are built to handle regional requirements for seismic (earthquake), wind (tornado or straight line winds) or water (rain, snow, flood) based disasters. By the AHJ issuing the building permit it is expected the plans have been reviewed against the local standard outlined in their adopted building codes, and meet these requirements.

UPCS Protocols - An IHDA Construction Representative will make a visit to each unit and evaluate the site against the attached UPCS checklist (see attached Uniform Physical Condition Standards for Multifamily Housing Rehabilitation) to ensure they meet with minimum requirements. The checklist will be used in conjunction with the previously completed Property Needs Assessment (see attached PNA) to establish the minimum scope to be included with any rehabilitation project approved for funding. This checklist has been created to have separate lists for multi-family dwellings and single family homes.

The UPCS checklist shall identify any repair items that represent an immediate threat to health and safety, and all other significant defects, deficiencies, items of deferred maintenance, and material building code violations that would limit the expected useful life of major components or systems. Deficiencies regarding significant life safety issues must be identified and identified as work to be immediately corrected as part of the scope of work.

Post-occupancy, IHDA's Asset Management Services Department will review the ongoing project needs utilizing HUD's Uniform Physical Condition Standards to ensure HTF-assisted projects and units will be decent, safe, sanitary and in good repair as described in 24 CFR 5.703.

9. Resale or Recapture Guidelines. Below, the grantee must enter (or attach) a description of the guidelines that will be used for resale or recapture of HTF funds when used to assist first-time homebuyers. If the grantee will not use HTF funds to assist first-time homebuyers, enter "N/A".

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

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

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 a national HTF project is also allocated LIHTC's as part of its project financing.

12. **Refinancing of Existing Debt.** Enter or attach the grantee’s refinancing guidelines below. The guidelines describe the conditions under which the grantee will refinance existing debt. The grantee’s refinancing guidelines must, at minimum, demonstrate that rehabilitation is the primary eligible activity and ensure that this requirement is met by establishing a minimum level of rehabilitation per unit or a required ratio between rehabilitation and refinancing. If the grantee will not refinance existing debt, enter “N/A.”

Not Applicable: 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:

- New investment is being made to create additional affordable units:
- 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
- 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.
- The review of the management practices of the applicant must demonstrate that any proposed rehabilitation is not a result of disinvestment in the property

**Discussion:**
Attachments
Citizen Participation Comments – Public Notice

STATE OF ILLINOIS PUBLIC NOTICE
Public Hearing
on the Draft 2018 Consolidated Plan-Action Plan
and
a Substantial Amendment to HOPWA eligible activities for the 2010-2014 Consolidated 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 2018 Action Plan. This draft document will be available to the public electronically by Tuesday, May 29, 2018, 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 HUD formula grant programs: the Community Development Block Grant (CDBG); HOME Investment Partnerships; Emergency Solutions Grant (ESG); Housing Opportunities for Persons with AIDS (HOPWA); and the (National) Housing Trust Fund. 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 Thursday, June 21, 2018 in Springfield at 10:00 A.M. It will be held at the Illinois State library, 300 South 2nd Street, Springfield. Confirm IHDA’s website, www.ihda.org. 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 Tuesday, May 29, 2018, and all written public comments must be received at IHDA by close of business on Thursday, June 28, 2018. For further information, contact:

Illinois Housing Development Authority
Strategic Planning and Research Department
Office of Housing Coordination Services (OHCS)
Attention: Consolidated Plan
111 E. Wacker Drive, Suite 1000
Chicago, Illinois 60601
312/836-5364

Dated: May 23, 2018
Joint Public Hearing
For the State of Illinois’
State Consolidated Plan-Draft 2018 Action Plan/
and the HOPWA Substantial Amendment to the 2010 – 2014 Five-Year Plan

Thursday, June 21, 2018 @ 10:00 A.M.
Illinois Authors Room
Illinois State Library
300 South Second Street
Springfield, Illinois

Agenda

- Welcome and Introductions/Overview of Agenda – Office of Housing Coordination Services, Strategic Planning and Reporting (SPAR-OHCS) Illinois Housing Development Authority (IHDA)
- Historical Overview of the State Consolidated Plan; Citizen Participation Process; State Priorities – IHDA
  - The Comprehensive Housing Plan Act (P.A. 94-965) and the Annual Comprehensive Housing Plan
  - State’s Draft 2018 Action Plan and the Major HUD Formula Funding Programs:
    - Community Development Block Grant (CDBG) and the Non-Housing Community Development Plan - Illinois Department of Commerce and Economic Opportunity (DCEO)
    - HOME Investment Partnerships Program – Illinois Housing Development Authority (IHDA)
    - National Housing Trust Fund (NHTF)-Illinois Housing Development Authority (IHDA)
    - Emergency Solutions Grant (ESG) – Illinois Department of Human Services (IDHS)
    - Housing Opportunities for Persons With AIDS (HOPWA) – Illinois Department of Public Health
- Housing Opportunities for Persons with AIDS (HOPWA)-Substantial Amendment (2010 -2014)
- Other Funding and Other Actions– IHDA
- Public Comments and Testimony/Question and Answer Period
- Adjournment
Mr. Bill Pluta began the meeting, welcoming attendees and giving a brief history of the State’s role in developing both the HUD-required Consolidated Plan and the State-required Annual Comprehensive Housing Plan (ACHP). He stated that all Consolidated Plan and ACHP documents are available for review and download on the IHDA website. He also gave a brief description of the Citizen Participation Plan, and the State’s housing priorities addressed in both of the plans.

Mr. Burton Hughes then reviewed the public consultation process for the Consolidated Plan. Since there was no federal budget until March 23, and HUD allocations were only released May 1, 2018, the Public Comments process has been delayed. Since 2014, Formula Grant recipients can no longer submit Action Plans until HUD has formulated and published the exact allocations. These actual amounts must be included in the draft Action Plan distributed to the public as part of the Consolidated Plan-Citizen Participation component. The 2018 Consolidated Plan-Action Plan is the fourth annual Action Plan under the State’s Five-Year 2015-2019 Consolidated Plan using HUD’s E-conplanning system, and is the third plan containing information on the national Housing Trust Fund (HTF), which is now fully integrated into the E-conplanning system. There will no longer be a separate public comments/approval process for the HTF. The 30-day Public Comments period began Tuesday, May 29, 2018 and will end Thursday, June 28. The 2018 Action Plan will be submitted to HUD on June 29, 2018. The State will have one day to respond to any public comments and may need to request an extension on its public comment responses from HUD, depending on the amount and specificity of comments received.

Federal 2018 Allocations for the five formula grant allocations are:

<table>
<thead>
<tr>
<th>Formula Grant</th>
<th>Amount</th>
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<tr>
<td>CDBG</td>
<td>$28,944,705</td>
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<tr>
<td>HOME</td>
<td>$16,288,968</td>
</tr>
<tr>
<td>ESG</td>
<td>$4,612,743</td>
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<tr>
<td>HOPWA</td>
<td>$1,535,465</td>
</tr>
<tr>
<td>HTF</td>
<td>$9,812,230</td>
</tr>
</tbody>
</table>

There is $61,194,111 in total 2018 Consolidated Plan Formula Grant funding for the State of Illinois, with significantly increased funding for both HOME and HTF over the previous years of the current Five-Year Plan.
The Illinois Department of Public Health is also making a substantial amendment to the 2010-2014 Action Plan in order to use pre-2015 HOPWA funding for HOPWA housing facilities rehabilitation. The 30-day public comments period for the HOPWA amendment is running concurrently with the 2018 Action Plan public comments period. The HOPWA substantial amendment will also be submitted to HUD on June 29. See below for the HOPWA information Ms. Deborah Grant shared with attendees.

Mr. Pluta and Mr. Hughes then reviewed for attendees all relevant sections and information from the 2018 Action Plan, including the Executive Summary, Citizen Participation, Public Consultation, Expected Resources, Annual Goals, Allocation Priorities, Method of Distribution, Public Housing, Homeless/Other Special Needs, Affirmatively Furthering Fair Housingupdate, Barriers, and Other Actions sections of the document. IHDA also discussed its activities with Public Housing Authorities (single-family rental, new construction, RAD projects, mixed-financing) as well as troubled PHAs. Ms. Anne Smith, of Menard County Housing Authority (MCHA), mentioned its successful funding previously under IHDA’s programs. MCHA is also assuming the Tenant Protection Vouchers (TPVs) for the Alexander County Housing Authority, which is currently in receivership.

Individual program reports then followed:

Ms. Wendy Bell of the Department of Commerce and Economic Opportunity (DCEO) reviewed the various components and projected funding levels for the 2018 Community Development Block Grant Program (CDBG). The State’s total CDBG allocation for 2018 is $28,944,705. For 2018, CDBG Public Infrastructure is funded at $15,000,000. The Grant Ceiling is $500,000 per grant. Funding is estimated to benefit 12,000 individuals. Housing Rehabilitation is funded at $6,500,000, with the goal of providing single-family owner occupied housing rehabilitation assistance to 130 low-income households. Economic Development is funded at $4,000,000, estimated to assist 4 businesses, and create and/or retain 114 jobs across the State of Illinois. DCEO has scheduled the CDBG Grant Application and Administrative Workshop for 2018 are for July 17-19 in Springfield.

In additional information, the new Disaster Response Program for 2019 will provide interim assistance (clean-up) for areas designated by the Governor as State Disaster Areas. Individual grants are capped at $200,000 per grant. The CDBG set-aside is $2 million. In case of emergency, DCEO reserves the right to change CDBG allocations to address specific needs in the communities affected. Program Year 2017 Public Infrastructure awards were announced May 10, 2018, with $14.5M in CDBG funding for 36 communities in 29 counties across the State. 2017 CDBG Housing Rehabilitation awards totaling $6M for work in fourteen communities, and providing for the rehabilitation of owner-occupied single-family homes, were announced May 11. Prior Disaster Recovery (DR) efforts are now complete and undergoing final closeouts. DR’s last draw was made in April of 2018. The Help Eliminate Lead Program (HELP) is underway in Galesburg. DCEO is working with the University of Illinois-Chicago on a study of this pilot program.

Ms. Lila Robinson of the Illinois Department of Human Services (IDHS) reported on the 2018 Emergency Solutions Grants Program, funded at $4.6 Million. The ESG Program has a 24-Month grant deadline after the date HUD signs the grant agreement to expend program funds. Under the State’s Priorities, ESG serves low-income households, homeless and at-risk homeless. ESG program funding is dispersed geographically to 19 local Illinois Continuums of Care that coordinate 93 agencies contracted with IDHS to provide the ESG program services to the homeless. Apart from Program Administration (7.5%) and the Housing Management Information System (HMIS, at 4%), the State expects to commit ESG funds for the following activities.

<table>
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<tr>
<th>2018 Activity</th>
<th>Estimated Funding</th>
</tr>
</thead>
<tbody>
<tr>
<td>Street Outreach</td>
<td>$69,190 (2%)</td>
</tr>
<tr>
<td>Emergency Shelter</td>
<td>$2,352,490 (52%)</td>
</tr>
<tr>
<td>Rapid Re-Housing</td>
<td>$1,614,460 (35%)</td>
</tr>
</tbody>
</table>

Mr. Hughes reviewed goals for both the HOME Program and Housing Trust Fund for 2018. The 2018 HOME allocation is $16,288,968. For the 2018 HOME program, the Illinois Housing Development Authority has projected an estimate for the construction of HOME rental units consisting of the construction of 42 new units through HOME Multi-family funding. IHDA estimates the rehabilitation of 29 existing units through HOME Multi-family for 2018, resulting in 71 HOME units for 2018. No Single-family programs are funded under HOME. IHDA does fund these types of programs through the Illinois Affordable Housing Trust Fund.
The 2018 national Housing Trust Fund (HTF) allocation for 2018 is $9,812,230. For the national HTF IHDA estimates the construction of 25 new units through the national HTF program, and the rehabilitation of 18 existing units through the national HTF program, for an estimated 43 units of multi-family affordable housing for households at or below 30% of Area Median Income. Mr. Hughes also noted that previous year, 2017 HTF Funds, in the amount of $7,163,487 will be distributed in tandem with IHDA’s Round V PSH Development Program award, once that process is completed. Applications for Round V of the PSH Development Program award are due by COB July 20, 2018 via the PSH-RFA.

Ms. Deborah Grant of the Illinois Department of Public Health spoke on the HOPWA Program for 2018 (allocated at $1,535,465), and the substantial amendment to the previous 2010-2014 Five-Year Consolidated Plan, in order to transfer approximately $1 Million in pre-2015, unexpended HOPWA funds for use under the current, 2015-2019 Five-Year Consolidated Plan for rehabilitation of AIDS housing facilities. IDPH also proposed expansion statewide of its tenant-based rental assistance program. Grant recipient persons/households receiving assistance must be housed as a pre-requisite to eligibility under the program. IDPH also is establishing its environmental review process, which is needed in order to release funds for any construction/rehabilitation activities.

There were no additional comments received at the Public Hearing.
State of Illinois HOPWA Program

Background


The Substantial Amendment will place in effect an additional eligible activity into that previous Consolidated Plan, enabling the shift of federal project year funding from ILH13F999 and ILH14F999 to those same activities already eligible under the current 2015-2019 Consolidated Plan.

The total amount affected is $2,664,285.00. Upon completion of this substantial amendment, all allocated ILH13F999 and ILH14F999 funds will correctly reflect their transfer to the HIV Care Connect Lead Agents and housing facilities, via the HUD E-conplanning/Integrated Disbursement Information System (IDIS). This will ensure funds from 2013 and 2014 under the 2010-2014 Consolidated Plan are accurately tracked under the new grant based accounting system, reflecting the funding of needed housing services including Short Term Rent, Mortgage (STRMU), and Utility Assistance/Tenant Based Rental Assistance (TBRA), and housing facilities rehabilitation that are currently eligible for Annual Action Plans under the current 2015-2019 Consolidated Plan.

Proposed Substantial Amendment:
The Illinois Department of Public Health is proposing the following amendments:

1. In IDIS, to verify the eligible use of Project Year ILH14F999 funds in the amount of $1,174,241.00 (for transfer to the 2015-2019 Consolidated Plan) to provide TBRA, STRMU, and rehabilitation/repairs and supportive services to housing facilities located in the HIV Care Connect Region. In IDIS, funds will reflect their application to grantee’s 2018 grant recipients under the previously approved Spending Plan

Overview of Spending for Illinois HOPWA – Table 1:

<table>
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<tr>
<th>FFY</th>
<th>Award Amount</th>
<th>Expenditures</th>
<th>Balance</th>
<th>Comments</th>
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<tr>
<td>2014</td>
<td>$1,174,241.00</td>
<td>$</td>
<td>$1,174,241.00</td>
<td>Per IDIS these funds will reflect their expending and commitment to Lead Agents for STRMU and facility rehabilitation activities.</td>
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<tr>
<td>Totals</td>
<td>$4,511,108.00</td>
<td>$1,758,233.48</td>
<td>$2,752,874.52</td>
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Table 2: Federal Funding for Rehabilitation /Repairs and Housings Support

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<tr>
<th>Housing Facility</th>
<th>Amount of HOPWA Funding</th>
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<tr>
<td>Alexian Brothers The Harbor</td>
<td>$240,000.00</td>
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<td>Bethany Place</td>
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<td>DeLaCerda House</td>
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<td>Phoenix Center</td>
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<td>Fifth Street Renaissance</td>
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<td>Puerto Rican Cultural Center</td>
<td>$240,000.00</td>
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June 28, 2018

Audra Hamernik  
Executive Director  
Illinois Housing Development Authority  
111 E. Wacker Drive, Suite 1000  
Chicago, Illinois 60601

Dear Ms. Hamernik:

Thank you for the opportunity to comment on the Illinois Housing Development Authority’s (IHDA) Draft 2018 Consolidated Plan - Annual Action Plan, as well as the Draft 2018 Allocation Plan for the National Housing Trust Fund (NHTF). We offer the following comments; Items I to III comment on the Consolidated Plan – Action Plan, and Item IV addresses IHDA’s NHTF Allocation Plan.

I. Require and Promote Greater Levels of Accessible and Integrated Housing

The tremendous need for affordable and accessible housing for people with disabilities is well-documented and long recognized by IHDA. In fact, a January 2017 report from the Illinois Supportive Housing Working Group concluded "the State needs twice as many units as it currently has to have enough physical infrastructure (typically scattered-site and apartment units) to house every eligible individual [with a disability] that is currently in need.” Additionally, here at Access Living we helped 159 people find housing that met their needs in the community over the past year; however, we receive hundreds of requests for help every month. To address that need, we recommend IHDA more aggressively promote accessible and integrated housing for people with disabilities, as outlined below.

Recommendation #1

Currently, IHDA’s Qualified Allocation Plan (QAP) requires that (a) at least 10% of units be accessible for persons with mobility-related disabilities and (b) at least 2% of units be accessible for persons with sensory disabilities (vision/hearing disabilities). However, it is not clear what accessibility standards are to be applied. Because of this lack of clarity, we urge IHDA, through its QAP, to mandate that 10% of units be accessible/adaptable per the demanding new construction requirements of Section 504 of the Rehabilitation Act, which apply to housing that receives federal funding. Our view is that regardless of whether a particular housing project receives federal funds, IHDA should require its developers to comply with the Section 504 standards for physical accessibility in 10% of units, and the 504 standards for sensory accessibility (hearing/vision) in 5% of the units.¹ Of course, to the extent federal financing is involved, the Section 504 standards would be mandatory.

Recommendation #2

¹ Section 504 requires enhanced mobility features in 5% of units and enhanced sensory features in 2% of units. Given the great need for affordable and accessible housing, we urge IHDA to adopt a 10% and 5% requirement.
Furthermore, although we appreciate that IHDA gives scoring bonuses (extra points) to housing proposals that go beyond IHDA’s accessibility benchmarks (i.e. by incorporating universal design into the developments), IDHR should increase these bonuses to further incentivize enhanced accessible design.

Recommendation #3

Because of the state’s obligations under the trio of Olmstead consent decrees in Illinois, the QAP scoring system should award additional points for housing focused on individuals exiting institutions under those decrees. Relatedly, IHDA should establish a Low Income Housing Tax Credit (LIHTC) set-aside or preference for projects that serve these populations, and add consent decree populations to the category of tiebreaker target audiences. Realignment of the QAP with the goals of the Olmstead decrees will provide an unprecedented opportunity for Illinois to house people with disabilities leaving institutions and helps to fulfill the state’s legal obligations.

Recommendation #4

IDHA should support scattered site developments that utilize vacant infill lots. This will address a community problem not typically covered by LIHTC development. Such a model is scalable based on available sources, and does not require zoning changes.

Recommendation #5

In certain ways, IHDA’s current QAP incentivizes a number of choices that work against delivering the maximum number of accessible units at a reasonable cost. For example, the QAP incentivizes rehabilitation of existing housing even though it may be difficult or even impossible to retrofit the housing to make it accessible for people with mobility disabilities. Future QAPs should award points for rehabilitation of existing scattered site developments only when the rehabilitation will result in truly accessible housing. Also, the QAP should not penalize smaller developments.

Recommendation #6

Furthermore, with respect to housing covered by the new construction provisions of the Fair Housing Act, IHDA should require they be built with Type A bathrooms, rather than Type B. Type A bathrooms provide more meaningful access and will greatly expand the accessible housing stock. Aside from bathroom type, all units covered by new construction and design standards should be adaptable at the highest possible standard.

Recommendation #7

In addition, we urge IHDA require that developers provide: (a) general proactive outreach to the public about the accessibility features of their buildings; and (b) targeted outreach to prospective renters with disabilities when units with specific access features (e.g. features for a person with a hearing disability) become available. Such outreach will help ensure units with specific access features are actually filled by tenants who need those features. Relatedly, IHDA should oblige developers to hold open/reserve accessible units for a prescribed period of time in an effort to fill them with tenants who require those units. Only after such time elapsed would developers be authorized to fill the units with tenants who do not require accessibility features. IHDA should require that developer outreach plans are approved by IHDA and that accessible units be held open with similar outreach when rental units turnover and are re-leased. There should be a mechanism for monitoring and penalizing developers and rental agents for noncompliance.

II. Restructure Rental Assistance to Make Housing More Affordable

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2 Under the Fair Housing Act, developers can opt to build Type A bathrooms or Type B bathrooms, which provide different levels of accessibility.
We urge IHDA to restructure rental assistance, a fundamental component of affordable housing for people with disabilities. IHDA should modify the QAP to provide additional points for higher levels of rental assistance. We recognize that at the pre-application stage the creation of partnerships to ensure greater rental assistance is labor intensive; however, the resulting partnerships will ensure a successful project.

III. Increase Funds for Home Accessibility Program

We recommend that IHDA substantially increase its funding for the Home Accessibility Program, which was established to help people with disabilities pay for structural accessibility improvements to their homes or apartments, such as a ramp, wider doorways, the installation of grab bars, and/or lowered kitchen cabinets. The current allotment is insufficient because (a) there are 742,600 Illinois residents with mobility-related disabilities and (b) modification projects are costly. Increasing the funding of modifications is wise and cost-effective because they allow people with disabilities to remain in their homes and avoid institutionalization.

IV. Ensure Disability Inclusion in the 2018 NHTF Allocation Plan

The funds IHDA receives from the National Housing Trust Fund will be a key resource in creating affordable, accessible, integrated housing for people with disabilities. The draft NHTF Allocation Plan contains guidelines for the use of those funds. To ensure disability is a central consideration in the allocation of NHTF funds, Access Living recommends that it be made clear on Page 1 of the Allocation Plan, in item (3) under the heading Eligible Recipients and Eligibility Requirements, that compliance with Federal law includes non-discrimination under the Fair Housing Act, as well as compliance with the design and construction standards of the Fair Housing Act and Section 504 of the Rehabilitation Act.

***

Again, thank you for the opportunity to offer our input into the Draft Con Plan – Action Plan and the NHTF Allocation Plan. The aforementioned recommendations will lead to greater housing choice for people with all kinds of disabilities. Hence, we urge your serious consideration of them. If you need further information or have any questions, please do not hesitate to contact me.

Regards,

Marca Bristo
President and CEO
July 2, 2018

Marca Bristo
President and CEO
Access Living
115 W. Chicago Ave
Chicago, IL 60654

Re: Draft 2018 Annual Action Plan/Housing Trust Fund (HTF) Public Comments Letter

Dear Ms. Bristo,

Thank you for your public comments letter submitted on June 28, 2018 on the State Consolidated Plan-draft 2018 Action Plan and Housing Trust Fund (HTF). As was observed in my response to your similar public comments letter submitted last year, most of these recommendations focused on suggestions for improving and increasing accessibility in affordable housing, but most (8 of the 10) of these recommendations were directly concerning the Low Income Housing Tax Credit (LIHTC) Program and its 2018-2019 Qualified Allocation Plan (QAP).

As was stated last year in my response letter, the State Consolidated Plan covers the funding applications under the CDBG, HOME, ESG, HOPWA, and NHTF programs. While IHDA includes reference and information on the LIHTC Program within this draft Action Plan, the LIHTC Program is actually covered under a separate “application” and public participation process. IHDA completed this process for the current (2018-2019) QAP last fall (2017), and published it on October 26, 2017, after holding a series of “QAP Summits” prior to its drafting and publishing of the draft QAP for public comment, and holding a public hearing.

As this QAP process is completed for the 2018-2019 calendar years, your LIHTC-related comments will be forwarded to IHDA’s Multi-Family Financing Department for further consideration under the next QAP. This process will likely begin in late spring/early summer of 2019. You are certainly welcome and encouraged to resubmit and/or revise your comments after the next draft QAP is posted, especially if you feel that your concerns have not been adequately addressed in the current QAP. Please note that all of your current recommendations were in fact addressed in finalizing the current QAP.

The recommendations concerning the 2018 Annual Action Plan are addressed as follows:

**Increase Funds for Home Accessibility Program**

As was stated in my last response letter, IHDA has maintained a multi-year commitment for funding home modifications under its Home Accessibility Program (HAP), targeted to assist persons with disabilities to remain in their homes, but has done so through the more flexible funding of the Illinois Affordable Housing Trust Fund. Depending on funding availability, IHDA may make a new round of funding available later this fall/winter to further assist current and new project sponsors in meeting this critical need.
Given major funding reductions and more restrictive requirements under the HOME Program, IHDA no longer funds single-family rehabilitation programs under it. All limited funding is allocated to multi-family affordable housing, which also includes enhanced accessibility requirements for all projects. Illinois Affordable Housing Trust Fund is also one of HDA’s major resources for also doing affordable rental housing (generally with LIHTCs) as well as permanent supportive housing. IHDA appreciates this ongoing support for increased funding for this program.

IHDA also funds a significant amount of accessible housing (both new construction and rehabilitation) under its affordable rental housing programs. As was referenced in your letter, IHDA mandates a 10% accessible units requirement, which is twice the federal/HUD requirement, so this is adding significantly to available, accessible housing units assisted by IHDA.

Finally, IHDA has worked with its other State partner agencies through the Illinois Housing Search (housing locator) and Statewide Referral Network (SRN) to establish a statewide waiting list for handicapped-accessible housing units. This will increase the use/occupancy of such units by persons/households needing accessible housing.

**Ensuring Disability Inclusion in the National HTF Allocation Plan**

The major Congressional intent of the national Housing Trust Fund (HTF) was to provide additional housing resources to assist extremely low-income households (30% of area median income or below), especially with rental housing. Please note that the reference to “Eligible Recipients” in the HTF Allocation Plan is regarding eligible applicants, or project sponsors, not individuals or households. As such, otherwise qualifying organizations which focus on developing housing for persons with disabilities (e.g., centers for independent living) are included in that definition.

Please also note that given the deep income-targeting of HTF, IHDA utilizes this funding through its Permanent Supportive Housing Development (PSHD) Program, which combines a number of IHDA resources to provide this assistance, including NHTF, Illinois Affordable Housing Trust Fund, HOME, and State donation tax credits. There is currently a Request For Applications (RFA) for Round V of this PSHD funding posted on IHDA’s website, with a July 20, 2018 submittal deadline. This RFA very directly cites fair housing compliance requirements (Fair housing Act, Section 504, ADA, Illinois Human Rights Act) on pages 40-42, as well as accessibility and universal design standards (pages 19-20). In addition, it includes: scattered-site, integrated PSH, and single-site PSH projects as all being eligible; requires smaller-sized projects (25 units or less)-page 7; it includes exceeding the minimum level of accessibility and includes universal design under “Priority Activities” (page 9); includes the same accessibility standards used under the LIHTC Program (pages 19-20); and also incentivizes rental/operating assistance and Statewide referral Units (pages 34-35).

Thank you for continued supported of IHDA’s programs and your pro-active response to our Draft 2018 Annual Action Plan. We look forward to continued collaboration efforts.

Sincerely,

Bill Pluta
Director
Strategic Planning and Reporting Department
Illinois Housing Development Authority

Cc: Audra Hamernick, Executive Director, IHDA
    Alan Quick, Managing Director, SPAR
Grantee Unique Appendices

Grantee SF-424's and Certification(s)

Application for Federal Assistance SF-424

1. Type of Submission:
   - Preapplication
   - Application
   - Change/Correction Application

2. Type of Application:
   - New
   - Continuation
   - Revision
   - Other Specify:

2. Date Received:

4. Applicant Identifier:

St. Federal Entity Identifier:

5. State Award Identifier:

Grantee SF-424's and Certification(s):

Applicant:

d. Applicant Information:

* a. Legal Name: State of Illinois

* b. Employer/Taxpayer Identification Number/TIN:

* c. Organization Name:

* d. Address:

   * Street: 846 East Monroe Street
   * City:
   * County:
   * State: IL Illinois
   * Zip/Postal Code: 62201-1083

* e. Organizational Unit:

Department Name:

Illinois Department of Commerce and Economic Opportunity

F. Names and contact information of person to be contacted on matters involving this application:

* First Name: David

Middle Name: Wettman

Last Name: Wettman

Title: Community Development Specialist

Telephone Number: 217-636-4866

Fax Number: 217-520-4167

Email: david.wettman@illinois.gov
Application for Federal Assistance SF-424

**9. Type of Applicant & Select Applicant Type:**
- Local Government

**10. Name of Federal Agency:**
[Name]

**14. Catalog of Federal Domestic Assistance Number:**
[Catalog Number]

**15. Title:**
The Community Development Block Grant Program

**16. Funding Opportunity Number:**
Not Applicable

**17. Demonstration Identification Number:**
Not Applicable

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

**19. Descriptive Title of Applicant's Project:**
Submit all required documentation related to the recipient of FY 2018 Allocation of State Community Development Block Grant Funds
# Final State of Illinois - Annual Action Plan 2018

## Application for Federal Assistance SF-424

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<td>g. TOTAL</td>
<td>20,941,705.00</td>
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a. Application Subject to Review by State Under Executive Order 12372 Process?
   a. This application was made available to the State under the Executive Order 12372 Process for review on [ ]
   b. Program is subject to E.O. 12372 but has not been selected by the State for review [ ]
   c. Program is not covered by E.O. 12372 [ ]

b. Is the Applicant Deleguant to Any Federal Debt? (If "Yes," provide explanation & attachment.)
   a. Yes [ ]
   b. No [ ]

21. By signing this application, I certify (1) that the statements contained in the list of certifications " and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances" and agree to comply with any resulting requirements. (U.S. Code, Title 21, Section 1001)

   a. " I AGREE "

   b. The list of certifications and assurances, or an internet site where you may obtain the list, is contained in the announcement or agency specific instructions.

### Author/Representative:

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OMB Control No: 2506-0117 (exp. 06/30/2018)
### Application for Federal Assistance SF-424

#### Part 1: General Information
- **Type of Application:**
  - New
  - Continuation
  - Revision

#### Part 2: Applicant Information
- **Legal Name:** State of Illinois
- **Employee/Employee Identifier Number:** 1234567890
- **Title:** Managing Director, Multi-Family Financing
- **Organization:** Illinois Housing Development Authority
- **Telephone:** 312-123-4567
- **Fax:** 312-123-4567
- **Email:** info@ihda.org

#### Part 3: Address
- **Street:** 111 East Market Drive
- **City:** Chicago
- **State:** Illinois
- **Zip Code:** 60601-1366

#### Part 4: Financial Information
- **Federal Award Number:** 1234567890
- **Federal Award Amount:** $1,000,000

#### Part 5: Other Information
- **Project Description:**

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Final State of Illinois - Annual Action Plan 2018

OMB Control No: 2506-0117 (exp. 06/30/2018)
**Application for Federal Assistance SF-424**

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<td>Not Applicable</td>
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<td>14. Areas Affected by Project (Cities, Counties, States, etc.)</td>
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<td>The SF424 Program is designed to encourage public agencies, for-profit and non-profit agencies to apply for SF424 funding through IDEA in order to expand the supply of safe, affordable housing.</td>
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*Please attach supporting documents as specified in agency instructions.*
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**OMB Control No: 2506-0117 (exp. 06/30/2018)**
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<td>4. Federal Award Number</td>
<td>189</td>
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<tr>
<td>5a. State/County</td>
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<tr>
<td>5b. Federal Award Identifier</td>
<td>1032584650076</td>
</tr>
<tr>
<td>6. Address</td>
<td>111 N. MICHIGAN AVE</td>
</tr>
<tr>
<td>7a. City</td>
<td>Chicago</td>
</tr>
<tr>
<td>7b. State</td>
<td>Illinois</td>
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<tr>
<td>8a. Telephone Number</td>
<td>312-832-3070</td>
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<tr>
<td>8b. Fax Number</td>
<td>312-832-3176</td>
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**Organizational Unit:**
- Department Name: Illinois Housing Development Authority
- Subunit Name: Multi-Family Financing

**Individual:**
- First Name: 123
- Middle Name: 
- Last Name: 456
- Title: Managing Director, Multi-Family Financing
<table>
<thead>
<tr>
<th>Application for Federal Assistance SF-424</th>
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<tr>
<td>&quot;9. Type of Applicant/Select Applicant Type:</td>
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<tr>
<td>a. State Government</td>
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<td>Type of Applicant 3: School District Type:</td>
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<tr>
<td>Type of Applicant 2: Small Applicant Type:</td>
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<tr>
<td>&quot;Other (specify):</td>
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<tr>
<td>&quot;11. Name of Federal Agency:</td>
<td></td>
</tr>
<tr>
<td>b. U. S. Department of Housing and Urban Development (HUD)</td>
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<td>13. Catalog of Federal Domestic Assistance Number:</td>
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<tr>
<td>---571</td>
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<tr>
<td>15. Program Title:</td>
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<tr>
<td>Federal Housing Youth Fund</td>
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<tr>
<td>&quot;16. Funding Opportunity Number:</td>
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<tr>
<td>Not Applicable</td>
<td></td>
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<tr>
<td>&quot;Title:</td>
<td></td>
</tr>
<tr>
<td>Not Applicable. The Funding Youth Fund is a formula grant program</td>
<td></td>
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<tr>
<td>17. Competition Identification Number:</td>
<td></td>
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<tr>
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<td>&quot;18. Assumptions Affected By Project (Cities, Counties, States, etc.):</td>
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<tr>
<td>Add Attachment</td>
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<tr>
<td>Date Attachment</td>
<td></td>
</tr>
<tr>
<td>View Attachment</td>
<td></td>
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<tr>
<td>&quot;19. Descriptive Title of Applicant's Project:</td>
<td></td>
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<tr>
<td>The Federal Housing Youth Fund expands and preserves the supply of affordable housing, particularly rental housing, for extremely low-income and very low income households</td>
<td></td>
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<tr>
<td>#Applying agencies as specified in agency regulations</td>
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<tr>
<td>Add Attachment</td>
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<tr>
<td>View Attachment</td>
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</tbody>
</table>

Final State of Illinois - Annual Action Plan

2018

OMB Control No: 2506-0117 (exp. 06/30/2018)
Application for Federal Assistance SF-424

1. Type of Application:
   - New
   - Continuation
   - Other (Specify)

2. Description of Federal Program:

3. Applicant Name:

4. Federal Group Identifier:

5. State Use Only:
   - Date Received by State
   - Other Application Identifier

6. Applicant Information:
   - Legal Name: State of Illinois
   - Employer Identification Number (EIN/TIN):
     16-1315847
   - Organizational DUNS:
     601070020

7. Address:
   - Street: 115 E. Monroe Street
   - City: Springfield
   - State: IL
   - Province: IL
   - Zip Code: 62701

8. Organizational Unit:
   - Department Name: IL Dept. of Human Services
   - Position: Director, Community Assistance

9. Name and contact information of person to be contacted on non-Federal issues:
   - First Name: Lili
   - Last Name: Robinson
   - Telephone Number: 810-123-4567
   - Fax Number: 217-987-6543
   - Email: lili.robinson@illinois.gov

Final State of Illinois - Annual Action Plan 2018

OMB Control No: 2506-0117 (exp. 06/30/2018)
## Application for Federal Assistance SP-424

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<th>Field</th>
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<td>Type of Submission:</td>
<td>Application</td>
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<tr>
<td>Date of Submission:</td>
<td>November 30, 2017</td>
</tr>
<tr>
<td>Date Received:</td>
<td>December 5, 2017</td>
</tr>
<tr>
<td>Federal Entity Identifier:</td>
<td>01-0123456789</td>
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<tr>
<td>Applicant Identifier:</td>
<td>01-0123456789</td>
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<tr>
<td>State Name:</td>
<td>Illinois</td>
</tr>
<tr>
<td>Organization Name:</td>
<td>Illinois Department of Public Health</td>
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<tr>
<td>Telephone Number:</td>
<td>312-512-3456</td>
</tr>
<tr>
<td>Email:</td>
<td>health.state.il.us</td>
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</table>

### Applicant Information:
- **Name:** Final State of Illinois - Annual Action Plan 2018
- **Control No:** 2506-0117
- **Expiration Date:** 06/30/2018
**Application for Federal Assistance SF-424**

* Type of Applicant 1: Select Applicant Type:
  - State Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

* Otherwise:

**Name of Federal Agency:**
- Department of Housing and Urban Development (HUD)

**Grant Code (Federal Awarding Agency Code):**
- 201

**CFDA Title:**
- The HUD Program

**Program Name:**
- Not Applicable, The HOPWA Program is a formula grant program

**Competition Identification Number:**
- Not Applicable

**IA**
- Not applicable, the HOPWA Program is a formula grant program

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

Not Applicable

**Descriptive Title of Application Project:**
- N/A

**Program to provide grants to project sponsors for housing assistance and supportive services for low-income persons with HIV/AIDS and related conditions**

**Attach supporting documents as specified in agency instructions:**
Final State of Illinois - Annual Action Plan 2018

OMB Control No: 2506-0117 (exp. 06/30/2018)
STATE CERTIFICATIONS

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

Affirmatively Further Fair Housing – The State will affirmatively further fair housing.

Uniform Relocation Act and Anti-displacement and Relocation Plan – It will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisitions Policies Act of 1970, as amended, (42 U.S.C. 5001-5026) and implementing regulations at 49 CFR Part 24. It has in effect and is following a residential anti-displacement and relocation assistance plan required under 24 CFR Part 42 in connection with any activity assisted with funding under the Community Development Block Grant 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, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement.

2. If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, it will complete and submit Standard Form 17, “Disclosure Form to Report Lobbying,” in accordance with its instructions, and

3. It will require that the language of paragraphs 1 and 2 of this certification be included in the award documentation for all subawards at all levels (including subgrants, subcontracts, 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 Community Development Block Grant, HOME, Emergency Solutions Grant, and Housing Opportunities for Persons With AIDS funds are consistent with the strategic plan in the State’s consolidated plan.

Section 3 – It will comply with Section 3 of the Housing and Urban Development Act of 1968 (42 U.S.C. 1701u) and implementing regulations at 24 CFR Part 135.

Signature of Authorized official

[Signature]

[Date]

[Title]

Executive Director, IHDA
Specific Community Development Block Grant Certifications

The State certifies that:

1. Citizen Participation -- It is following a detailed citizen participation plan that satisfies the requirements of 24 CFR 491.115 and each unit of general local government that receives assistance from the State is following a detailed citizen participation plan that satisfies the requirements of 24 CFR 570.405.

Consultation with Local Governments --

1. 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;

3. 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 Needs 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 plan identifies community development and housing needs and specifies both short-term and long-term community development objectives that that have been developed in accordance with the primary objective of the CDBG program (i.e., the development of viable urban communities, by providing decent housing and expanding economic opportunities, primarily for persons of low and moderate income) and requirements of 24 CFR Parts 91 and 570.

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

1. Maximum Feasible Priority. With respect to activities expected to be assisted with CDBG funds, 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 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 Benefits. In the aggregate, not less than 70 percent of the CDBG funds, including Section 108 guaranteed loans, received by the State during the following fiscal year(s) 2018 and 2019 (as period designated by the State of one, two, or three specific consecutive fiscal year(s)) will be used for activities that benefit persons of low and moderate income.
1. Special assessments. It will not attempt to recover any capital costs of public improvements associated with CDBG Funds, including Section 108 loan guaranty funds, by assessing any amount against properties owned and occupied by persons of low and moderate income, including any that charged an assessment made in a condition of obtaining access to such public improvements.

However, if CDBG funds are used to pay the proportion of a special assessment that relates to the capital costs of public improvements (as defined in Section 108 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.

In addition, 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 jurisdiction certifies that it has CDBG funds to cover the assessment.

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

1. 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

2. A policy of enforcing applicable State and local laws against physically barring entrance to or exit from a facility or location which is the subject of such non-violent civil rights demonstrations within its jurisdiction.

Compliance with Anti-discrimination laws — The grant will be conducted and administered in conformity with title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d) and the Fair Housing Act (42 U.S.C. 3601-3619) and implementing regulations.

Compliance with Laws — It will comply with applicable laws.

[Signature of Authorized Official] 

July 3, 2018  

Date

[Executive Director, HDA]  

Title
Specific HOME Certifications

The State certifies that:

Tenant-Based Rental Assistance — If it plans to use HOME funds for tenant-based rental assistance, tenant-based rental 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 92.208 through 92.209 and that it is not using and will not use HOME funds for prohibited activities, as described in §92.214.

Subsidy Layering — 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 HOME funds in combination with other Federal assistance that is necessary to provide affordable housing.

Signature of Authorized Official

[Signature]

Date

July 2, 2018

Executive Director, IHDA

Title
Emergency Solutions Grant Certifications

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

Matching Funds - The State will obtain any matching amounts required under 24 CFR 576.201 in a manner so that the expenditures that are fundable under matching amounts receive the benefit of the exemption under 24 CFR 576.301(6)(2).

Discharge Policy - 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 correctional programs and institutions so as to prevent this discharge from immediately resulting in homelessness for these persons.

Confidentiality - The State will develop and implement procedures to ensure the confidentiality of records pertaining to any individual provided family violence prevention or treatment services under any project assisted under the ESAG 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 agreements comply with the following criteria:

Major Rehabilitation/conversion/renovation - 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 ESAG 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.

Essential Services and Operating Costs - If ESAG 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 ESAG 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 ESAG assistance shall be sufficient to ensure 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.
Homeless Persons Involvement – To the maximum extent practicable, the subrecipient will involve, through employment, volunteer services, or otherwise, homeless individuals and families, in constructing, maintaining, and operating facilities assisted under ESG, in providing services allowed 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.

Signature of Authorized Official

Date

Executive Director, IHDA
Title
Housing Opportunities for Persons With AIDS Certification:

The State HOPWA grantees 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 consolidated plan:

1. For a period of not less than 10 years, in the case of any building or structure purchased, leased, rehabilitated, renovated, or converted with HOPWA assistance,

2. For a period of not less than 3 years, in the case of assistance involving conversion or repair of a building or structure.

Signature of Authorized Official

Executive Director, IHEDA

Date: July 2, 2018
APPENDIX TO CERTIFICATIONS

INSTRUCTIONS CONCERNING LOBBYING CERTIFICATION:

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 1323, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than $10,000 and not more than $200,000 for each such failure.
11. Will comply, or has already complied, with the requirements of Titles II and IV of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (PL. 91-146) which provide for fair and equitable treatment of persons displaced or otherwise adversely affected as a result of federal and federally assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.

12. Will comply with the provisions of the Hatch Act (5 U.S.C. 631a-22 and 7124-7126) which limit the political activities of employees whose noncritical employment activities are funded in whole or in part with Federal funds.


14. Will comply with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-338) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable flood damage is $18,000 or more.

15. Will comply with environmental standards which may be prescribed pursuant to the following: (a) regulation of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11988, (b) notification of violations addressed pursuant to EO 11988, (c) protection of wetlands pursuant to EO 11988, (d) exclusion of flood insurance in floodplains in accordance with EO 11988, (e) assessment of project sustainability with the approval of management programs developed under the Coastal Zone Management Act of 1972 (40 U.S.C. §4401 et seq.) (f) compliance of Federal agencies to follow (Clean Air Act) implementation plans under Section 7(a) of the Clean Air Act of 1966, as amended (42 U.S.C. §7410 et seq.), (g) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).


18. Will conduct an audit of the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1985 and OMB Circular No. A-133 “Audit of States, Local Governments, and Non-Profit Organizations.”

19. Will comply with all applicable requirements of all other Federal, state, executive order, regulation, and policies governing this program.

20. Will comply with the requirements of Section 1904 of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. §7164) which prohibits grant award recipients or subrecipients from (1) engaging in severe forms of trafficking in persons during the period in time that this award is in effect (2) obstructing a continued transfer of persons in the period of time that this award is in effect; (3) using fraud labor in the performance of the award or subawards under the award.
Final State of Illinois - Annual Action Plan

11. Will comply, or has already complied, with the requirements of Title II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (42 U.S.C. §§4601-4618 and 2450l-2308) which limit the amount of assistance for the purchase, placement, or rental of housing for displaced persons.

12. Will comply with the provisions of the Bank Act (42 U.S.C. §§51501-51518 and 2536-2308) which limit the amount of assistance for the purchase, placement, or rental of housing for displaced persons.


14. Will comply with the requirements of the Flood Disaster Protection Act of 1973 (PL 93-234) which require the insurance of a special flood insurance policy to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is $10,000 or more.

15. Will comply with the requirements of the National Environmental Policy Act of 1969 (PL 91-190) and the Environmental Protection Agency (EPA) regulations (40 CFR 1.11) which prohibit the issuance of permits for any activity that would result in significant environmental effects.

16. Will comply with the requirements of the Safe Drinking Water Act of 1974 (PL 93-523) which prohibit the issuance of permits for any activity that would result in significant environmental effects.

17. Will comply with the requirements of the Endangered Species Act of 1973 (PL 93-205) which prohibit the issuance of permits for any activity that would result in significant environmental effects.

18. Will comply with the requirements of the Safe Drinking Water Act of 1974 (PL 93-523) which prohibit the issuance of permits for any activity that would result in significant environmental effects.

19. Will comply with the requirements of the Clean Air Act of 1970 (PL 91-604) which prohibit the issuance of permits for any activity that would result in significant environmental effects.

20. Will comply with the requirements of the Endangered Species Act of 1973 (PL 93-205) which prohibit the issuance of permits for any activity that would result in significant environmental effects.

Signature: [Signature]
Title: [Title]
Applicant Organization: [Applicant Organization]
Date Submitted: 7/26/2018
NOTE. Details of these assurances may not be applicable to your program or agency. If you have questions, please contact the Agency's grant program officer. You may also apply to additional assistance. If this is the case, you will be notified.

1. I hereby agree to comply with the requirements of public assistance programs and the requirements of this plan, including those relating to the organization, management, and operations of programs described in this plan.

2. I have read the applicable act or acts of the Congress, and the law of the State of Illinois, which relate to my program or agency, and I will comply with the requirements of these acts and laws.

3. I will not receive public assistance from any other Federal, State, or local government agency that provides services similar to those provided under this plan.

4. I will provide the necessary assurances and make the necessary reports as required by law.

5. I will comply with the provisions of the Fair Labor Standards Act of 1938 (29 U.S.C. § 202 et seq.), which prohibits discrimination in employment on the basis of race, color, religion, sex, or national origin.

6. I will comply with the provisions of the Civil Rights Act of 1964 (42 U.S.C. § 2000e et seq.), which prohibits discrimination in employment on the basis of race, color, religion, sex, or national origin.

7. I will provide such assurances as are necessary to ensure compliance with the requirements of this plan.

8. I will comply with the provisions of the Federal Travel Act of 1990 (41 U.S.C. § 271 et seq.), which prohibits discrimination in travel on the basis of race, color, religion, sex, or national origin.


10. I will comply with all Federal laws and regulations relating to Federal assistance that are applicable to your program or agency.

Please return this page to the Agency's grant program officer. You may also apply to additional assistance. If this is the case, you will be notified.

Final State of Illinois - Annual Action Plan 2018

OMB Control No: 2506-0117 (exp. 06/30/2018)
11. Will comply, or has already complied, with the requirements of Title II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (42 U.S.C. §§4601-4621) which provide for the equitable treatment of persons dislocated as a result of Federal assistance programs. These requirements apply to all Federal real property actions for program purposes, regardless of Federal participation in insurance.


13. Will comply with the requirements of the Federal Water Pollution Control Act of 1972 (33 U.S.C. §§1251 to 1292, as amended) regarding the protection of water quality, the Clean Air Act of 1970 (42 U.S.C. §§1857 to 1866, as amended) regarding the protection of the national parks and historic monuments, and the Endangered Species Act of 1973 (16 U.S.C. §§1531 to 1533), regarding the protection of endangered species and wetlands.


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

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

1. Will notify the legal agency to apply for Federal assistance;

2. Will comply with the administrative requirements for the acceptance and awarding agency;

3. Will not dispose of, modify the use of, or change the terms of the original property interest or other interest in the facility or facility equipment without prior written permission from the awarding agency;

4. Will comply with the requirements of the administrative procedures for the awarding agency in the solicitation, review, and approval of construction plans and specifications;

5. Will provide the awarding agency with all information to ensure that the complete work contains the approved plans and specifications and will furnish progressive reports and such other information as may be required by the awarding agency;

6. Will complete and submit the work within the applicable timeframe and be in receipt of a release of the Federal awarding agency or State agency;

7. Will follow all procedures to prevent any person from gaining access to any property that contains or presents the appearance of personal or organizational confidential, critical, or personal information.

Authorized for Local Reproduction

OMB Control No: 2506-0117 (exp. 06/30/2018)
11. Will comply with the provisions of Title 23, Chapter 73 of the Uniform Relocation Assistance and Real Property Acquisition for Planning and Program Purposes Act of 1970 (42 U.S.C. § 4601-4611) and 24 C.F.R. 1.1001 that prohibit discrimination in the administration of Federal programs on the basis of race, color, national origin, sex, handicap or age.

12. Will comply with the provisions of the National Environmental Policy Act of 1969 (42 U.S.C. § 4321 et seq.) that prohibit discrimination in the administration of Federal programs on the basis of race, color, national origin, sex, handicap or age.

13. Will comply with the requirements of Title 23, Chapter 73 of the Uniform Relocation Assistance and Real Property Acquisition for Planning and Program Purposes Act of 1970 (42 U.S.C. § 4601-4611) and 24 C.F.R. 1.1001 that prohibit discrimination in the administration of Federal programs on the basis of race, color, national origin, sex, handicap or age.

14. Will comply with the requirements of the Flood Disaster Protection Act of 1973 (42 U.S.C. § 5051 et seq.) that prohibit discrimination in the administration of Federal programs on the basis of race, color, national origin, sex, handicap or age.

15. Will comply with the requirements of Title 23, Chapter 73 of the Uniform Relocation Assistance and Real Property Acquisition for Planning and Program Purposes Act of 1970 (42 U.S.C. § 4601-4611) and 24 C.F.R. 1.1001 that prohibit discrimination in the administration of Federal programs on the basis of race, color, national origin, sex, handicap or age.

16. Will comply with the requirements of Title 23, Chapter 73 of the Uniform Relocation Assistance and Real Property Acquisition for Planning and Program Purposes Act of 1970 (42 U.S.C. § 4601-4611) that prohibit discrimination in the administration of Federal programs on the basis of race, color, national origin, sex, handicap or age.

17. Will comply with the requirements of Title 23, Chapter 73 of the Uniform Relocation Assistance and Real Property Acquisition for Planning and Program Purposes Act of 1970 (42 U.S.C. § 4601-4611) that prohibit discrimination in the administration of Federal programs on the basis of race, color, national origin, sex, handicap or age.

18. Will comply with the requirements of Title 23, Chapter 73 of the Uniform Relocation Assistance and Real Property Acquisition for Planning and Program Purposes Act of 1970 (42 U.S.C. § 4601-4611) that prohibit discrimination in the administration of Federal programs on the basis of race, color, national origin, sex, handicap or age.

19. Will comply with the requirements of Title 23, Chapter 73 of the Uniform Relocation Assistance and Real Property Acquisition for Planning and Program Purposes Act of 1970 (42 U.S.C. § 4601-4611) that prohibit discrimination in the administration of Federal programs on the basis of race, color, national origin, sex, handicap or age.

20. Will comply with the requirements of Title 23, Chapter 73 of the Uniform Relocation Assistance and Real Property Acquisition for Planning and Program Purposes Act of 1970 (42 U.S.C. § 4601-4611) that prohibit discrimination in the administration of Federal programs on the basis of race, color, national origin, sex, handicap or age.
Assurances - Construction Programs

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Submit comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden, to the Office of Management and Budget, Paperwork Reduction Project (3408-0043), Washington, DC 20503.

Please do not return your completed form to the Office of Management and Budget. Send it to the address provided by the sponsoring agency.

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

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

1. Has the legal authority to apply for Federal assistance, and the institutional, managerial, and financial capability (including funds sufficient to pay the non-Federal share of project costs) to ensure proper planning, management, and completion of the project described in this application.

2. Will give the awarding agency, the Comptroller General of the United States, and, as appropriate, the State, the right to examine all records, books, papers, or documents related to the application and will establish a proper accounting system in accordance with generally accepted accounting standards in the event of audit. This assurance does not apply to any portion of a project which is subject to the provisions of the Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (2 C.F.R. 200).

3. Will not dispose of, modify, or use the use of, or change the terms or conditions of the real property title or other interest in the site without prior written permission from the awarding agency. This assurance does not apply to any portion of a project which is subject to the provisions of the Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (2 C.F.R. 200).

4. Will comply with the requirements of the assistance awarding agency with regard to the drafting, review, and approval of construction plans and specifications.

5. Will provide and maintain competent and adequate engineering supervision at the construction site to ensure that the work is performed in accordance with the approved plans and specifications and will furnish progress reports and such other information as may be required by the assistance awarding agency or State.

6. Will complete and closeout the work within the applicable time frames after notice of completion of the awarding agency.

7. Will establish categories to prohibit employees from using tobacco products for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.

8. Will comply with the intergovernmental Personnel Act of 1970 (42 U.S.C. 41721-21763) relating to personnel standards for programs funded under one or the 19 statutes or regulations specified in Appendix A of OPMs Standards for a Merit System of Personnel Administration (5 C.F.R. 200.1, Subpart F).

9. Will comply with the Lead-Based Paint Renovation, Repair, and Painting Protection Act (42 U.S.C. 4851 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.

10. Will comply with all Federal statutes relating to nondiscrimination. These include, but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (28 U.S.C. 2241-2245) which prohibits discrimination on the basis of race, color, or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. 1681 et seq.), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. 794) which prohibits discrimination on the basis of handicap; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. 701 et seq.), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (21 U.S.C. 8401 et seq.), an amended relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Multi-Drug Abuse and Alcoholic Prevention, Treatment, and Rehabilitation Act of 1970 (21 U.S.C. 505), as amended, relating to nondiscrimination on the basis of alcoholic abuse or alcoholism; (g) §5303 and §577 of the Public Health Services Act of 1962 (42 U.S.C. 295a and 295j), as amended, relating to non-discrimination on the basis of mental illness or mental retardation; (h) Title VII of the Civil Rights Act of 1964 (42 U.S.C. 703 et seq.), as amended, relating to non-discrimination in the rental of and financing of housing; and (i) any other nondiscrimination provisions in the specifications under which application for Federal assistance is being made; and (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.
11. Will comply, or has already complied, with the requirements of Title II and III of the Uniform Relocation Assistance and Real Property Acquisition for_primary_uses Act of 1970 (P.L. 91-642) which provide fair and equitable treatment of persons displaced as a result of Federal and federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in the project.

12. Will comply with the provisions of the Clean Air Act (42 U.S.C. §§181-189 and 7704-7727) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.


14. Will comply with flood insurance purchase requirements of Section 103(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires residents in a special flood hazard area to participate in the program and to purchase flood insurance if the local cost of insurable coverage and acquisition is $10,000 or more.

15. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order 11514; (b) notification of pollution facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451-1457 et seq.); (f) conformity of Federal actions to State (Clean Air) implementation plans under Section 108(c) of the Clean Air Act of 1970, as amended (42 U.S.C. §§7541 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).


18. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."

19. Will comply with all applicable requirements of all other Federal, state, local, municipal, and all other applicable laws, regulations, and policies governing this program.

20. Will comply with the requirements of Section 106(c) of the Tidewater Coastal Plain Protection Act (TCPA) of 1983, as amended (22 U.S.C. §1106) which prohibits grant award recipients in a sub-recipient from (1) engaging in several forms of trafficking in persons during the period of time that this award is in effect or (2) using forced labor in the performance of the award or subaward under the award.

Grantee SF-424's and Certification(s)

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL

[Signature]

APPLICANT ORGANIZATION

[Organizational Name]

DATE SUBMITTED

[Date]

OMB Control No: 2506-0117 (exp. 06/30/2018)