



City of Peoria 2021 Annual Action Plan

City Hall
419 Fulton Street, Suit
Peoria, IL 61602



Executive Summary

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

1. Introduction

The purpose of the City of Peoria's 2021 Annual Action Plan is to continue building off the 2020-2024 Consolidated Plan to develop a viable urban community by providing decent housing, a suitable living environment, expanded economic opportunities principally for low- and moderate-income persons, and programs that will address the needs of persons experiencing homelessness. The plan sets forth how three Housing and Urban Development (HUD) grants: Community Development Block Grant, HOME Investment Partnership and Emergency Solution Grant, will be used as investment priorities to achieve specific HUD objectives and outcome performance measures.

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 Annual Action Plan consists of the following sections:

Process: Describes the consultation and citizen participation process undertaken to collect information from residents and stakeholders on community needs, as well as listing the lead and responsible agencies.

Annual Action Plan: Describes the planned investment of resources to implement specific programs that meet the City's strategic goals for 2021. Provides an overview of expected resources and the projects that will be implemented as a result, as well as the City's efforts to overcome various impediments and the City's coordination with local organizations in meeting goals.

3. Evaluation of past performance

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

According to the 2018 Program Year End Review Letter, HUD determined that the City has the continuing capacity to administer HUD Community Planning and Development (CPD) programs. The City

has no current findings, and its expenditure level on HUD funded grants meets the requirements of each program.

4. Summary of Citizen Participation Process and consultation process

Summary from citizen participation section of plan.

For the creation of the 2021 Annual Action Plan, the citizen participation process was based on direction received from HUD Notice 21-02. The results of the citizen participation process can be viewed in sections AP-10: Consultation and AP-12: Participation of this Annual Action Plan.

5. Summary of public comments

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

The public comments received during the citizen participation process can be viewed in section AP-12: Participation of this Annual Action Plan.

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

The City accepted all comments received throughout the citizen participation and consultation process of the 2021 Annual Action Plan. The detailed results of the citizen participation process can be viewed in section AP-12: Participation of this Annual Action Plan.

7. Summary

PR-05 Lead & Responsible Agencies – 91.200(b)

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

Describe the agency/entity responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source.

Agency Role	Name	Department/Agency
Lead Agency	PEORIA	
CDBG Administrator	PEORIA	COMMUNITY DEVELOPMENT
HOPWA Administrator		
HOME Administrator	PEORIA	COMMUNITY DEVELOPMENT
ESG Administrator	PEORIA	COMMUNITY DEVELOPMENT
HOPWA-C Administrator		COMMUNITY DEVELOPMENT

Table 1 – Responsible Agencies

Narrative (optional)

The lead agency responsible for the 2021 Annual Action Plan is the City of Peoria, a State of Illinois municipality. The City's Community Development Department, Grants Management Division is responsible for administering the Annual Action Plan. The City is not a member of a Consortium utilizing HUD funds.

The primary public and private agencies that may be utilized in implementing the Annual Action Plan activities include, but are not limited to, the City's Community Housing Development Organizations (CHDOs), the Heart of Illinois Homeless Continuum of Care, neighborhood associations, faith-based organizations, governmental entities, private contractors, and non-profit service and housing providers.

Consolidated Plan Public Contact Information

For more information about the 2021 Annual Action Plan, please contact Kathryn Murphy, Grants Division Manager, at the City of Peoria, 419 Fulton Street, Room 203, Peoria, Illinois, 61602-1217; via phone at (309) 494-8607; or via email at kmurphy@peoriagov.org.

AP-10 Consultation – 91.100, 91.200(b), 91.215(I)

1. Introduction

The City of Peoria has adopted a Citizen Participation Plan for its Consolidated Plan and Annual Action Plans to identify when public hearings and other consultations are to take place. The Citizens Participation Plan was used in preparing the 2021 Annual Action Plan, as well as HUD Notice 21-02 due to the ongoing COVID-19 pandemic. The Annual Action Plan was also prepared to comply with all the consultation requirements of the CDBG, HOME, and ESG programs, including consultation with the local homeless Continuum of Care.

Provide a concise summary of the jurisdiction’s activities to enhance coordination between public and assisted housing providers and private and governmental health, mental health and service agencies (91.215(I))

The City of Peoria has a good working relationship with the Peoria Housing Authority (PHA) and other assisted housing providers. The City of Peoria was in frequent contact via email regarding data for this Consolidated Plan. In addition, City leaders have been supportive of the efforts to rebuild Taft Homes, one of the older housing units in Peoria. An application for tax credits for this project was preliminarily approved by Illinois Housing Development Authority (IHDA) in January 2020. In addition, the City has used its CDBG funds to provide a match for the Peoria City/County Health Department's Lead Hazard Control and Healthy Homes grant funding. In 2018, we expanded this partnership to include CDBG funds for additional repairs such as roof replacements and major system repairs that were not eligible under the health department's grant. The City also has a close working relationship with other housing providers in the City such as Habitat for Humanity, Peoria Opportunities Foundation, Peoria Citizens Committee for Economic Opportunity (PCCEO), Southside Office of Concern, and others.Â

In recent years, the City has expanded its coordination with government health, mental health, and services agencies. A member of the grants staff has served as co-chair for the Reproductive Health Workgroup sponsored by the City/County Health Department as the department sought someone with housing experiences rather than health experience to assist in the meeting leadership. Through participation in this workgroup, the City has raised awareness of its homeowner rehab programs. In addition, members of the health community also sit on the City's Advisory Commission on Human Resources (HRC). With this additional representation, this led to Health Services being selected as a priority and four new health focused programs being funded through CDBG public service. City staff will continue involvement in these health workgroups, as it has been shown that housing and health are intertwined in the lives of low-income individuals in our community.

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.

The City continues to coordinate efforts with the Heart of Illinois Continuum of Care (CoC). About four years ago, an Executive Director position was created and is imbedded in the Heart of Illinois United Way. This position oversees the CoC Governing Board and is charged with the strategic planning of the CoC in order to improve outcomes for the homeless population. The City is an advisory member on the CoC Governing Board and attends meetings regularly. The City also attends the General Membership meetings and relevant taskforce meetings. Finally, the City coordinates the selection of subrecipients for ESG funding with the CoC Governing Board ranking and rating applications. These recommendations are presented to City Council for approval.

The CoC has developed a robust coordinated entry system for homeless persons in order to evaluate each person and family. This evaluation system takes into consideration chronically homeless individuals and families, families with children, veterans, and unaccompanied youth as key criteria for evaluation and placement on the list. Steering and sub-committees of the Continuum ensure that needs at each stage of homelessness are addressed, gaps in facilities in terms of bed capacities and services are filled, and programs addressing housing and supportive needs appropriately serve Peoria's area homeless persons and their families.

Describe consultation with the Continuum(s) of Care that serves the jurisdiction's area 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

The CoC plays a key role in the allocation of ESG funds. The application process for ESG funding is run through the CoC Executive Director with the Governing Board making funding recommendations for ESG funding. These funding recommendations go to City Council for final approval. Through this process, the outcomes that the City tracks for ESG has been updated. Previously, the City only tracked the number of people served in the shelter. With the guidance of the CoC, the City also tracks the exits to permanent housing as part of the grant tracking process. The CoC has also been instrumental in the funding decisions for ESG-CV funding following a similar process for almost all of the funding.

2. Describe Agencies, groups, organizations and others who participated in the process and describe the jurisdiction's consultations with housing, social service agencies and other entities

Table 2 – Agencies, groups, organizations who participated

1	Agency/Group/Organization	HEART OF ILLINOIS CONTINUUM OF CARE
	Agency/Group/Organization Type	Housing Services - Housing Services-Victims of Domestic Violence
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Non-Homeless Special Needs 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?	The Heart of Illinois Continuum of Care was made aware of the Annual Action Plan at its monthly meeting. City staff discussed the 2021 Annual Action Plan and its role in carrying out grant activities. City Staff invited the CoC members to review and make comments on the plan during the public comment period and directed members to the City website for reference to the plan.

2	Agency/Group/Organization	PEORIA CITY / COUNTY HEALTH DEPARTMENT
	Agency/Group/Organization Type	Services - Housing Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Persons with HIV/AIDS Services-Victims of Domestic Violence Services-homeless Services-Health Services-Education Health Agency Other government - Local Planning organization
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Non-Homeless Special Needs HOPWA Strategy Economic Development Anti-poverty Strategy Lead-based Paint Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	This organization was contacted via email for the overall 2021 Annual Action Plan goals, objectives, and activities. Additional consultation was held to discuss the Health Department's CDBG-funded match program activity identified in the 2021 Annual Action Plan.

3	Agency/Group/Organization	Peoria Housing Authority
	Agency/Group/Organization Type	Housing PHA Services - Housing Services-homeless Services-Employment Service-Fair Housing Other government - Local Housing Authority
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Homelessness Strategy Non-Homeless Special Needs Market Analysis 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?	This organization was contacted via email. The City anticipates that those consulted will provide comments regarding their own areas of expertise which will improve coordination and cooperation between the City and the PHA to improve the programming and outcomes of the 2021 Annual Action Plan.
4	Agency/Group/Organization	Village of Creve Coeur
	Agency/Group/Organization Type	Other government - Local

	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Non-Homeless Special Needs Market Analysis Economic Development Anti-poverty Strategy Lead-based Paint Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	This organization was contacted via email. The City anticipates that those consulted will provide comments regarding their own areas of expertise, which will improve coordination and cooperation among local governments to improve the programming and outcomes of the 2021 Annual Action Plan.
5	Agency/Group/Organization	EAST PEORIA
	Agency/Group/Organization Type	Other government - Local

	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Non-Homeless Special Needs Market Analysis Economic Development Anti-poverty Strategy Lead-based Paint Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	This organization was contacted via email. The City anticipates that those consulted will provide comments regarding their own areas of expertise, which will improve coordination and cooperation among local governments to improve the programming and outcomes of the 2021 Annual Action Plan.
6	Agency/Group/Organization	COUNTY OF PEORIA
	Agency/Group/Organization Type	Other government - County Major Employer

	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Non-Homeless Special Needs Market Analysis Economic Development Anti-poverty Strategy Lead-based Paint Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	This organization was contacted via email. The City anticipates that those consulted will provide comments regarding their own areas of expertise, which will improve coordination and cooperation among local governments to improve the programming and outcomes of the 2021 Annual Action Plan.
7	Agency/Group/Organization	Village of Peoria Heights
	Agency/Group/Organization Type	Other government - Local

	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Non-Homeless Special Needs Market Analysis Economic Development Anti-poverty Strategy Lead-based Paint Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	This organization was contacted via email. The City anticipates that those consulted will provide comments regarding their own areas of expertise, which will improve coordination and cooperation among local governments to improve the programming and outcomes of the 2021 Annual Action Plan.
8	Agency/Group/Organization	PEORIA PUBLIC SCHOOLS DISTRICT 150
	Agency/Group/Organization Type	Services-Children Services-homeless Services-Education Other government - Local Local School District Major Employer
	What section of the Plan was addressed by Consultation?	Homeless Needs - Families with children 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?	This organization was contacted via email. The City anticipates that those consulted will provide comments regarding their own areas of expertise, which will improve coordination and cooperation among local governments to improve the programming and outcomes of the 2021 Annual Action Plan.
9	Agency/Group/Organization	Peoria Park District
	Agency/Group/Organization Type	Services-Health Other government - Local Recreational Services
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs Market Analysis 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?	This organization was contacted via email. The City anticipates that those consulted will provide comments regarding their own areas of expertise, which will improve coordination and cooperation among local governments to improve the programming and outcomes of the 2021 Annual Action Plan.
10	Agency/Group/Organization	Tri-County Regional Planning Commission
	Agency/Group/Organization Type	Service-Fair Housing Regional organization Planning organization Business Leaders Civic Leaders Business and Civic Leaders
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy Economic Development

	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	This organization was contacted via email. The City anticipates that those consulted will provide comments regarding their own areas of expertise to improve the programming and outcomes of the 2021 Annual Action Plan.
11	Agency/Group/Organization	ADVOCATES FOR ACCESS
	Agency/Group/Organization Type	Housing Services-Elderly Persons Services-Persons with Disabilities Services-Persons with HIV/AIDS Services-Health
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Non-Homeless Special Needs Market Analysis Anti-poverty Strategy Lead-based Paint Strategy Accessibility Services
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	This organization was contacted via email. The City anticipates that those consulted will provide comments regarding their own areas of expertise to improve the programming and outcomes of the 2021 Annual Action Plan.

12	Agency/Group/Organization	THE CENTER FOR PREVENTION OF ABUSE
	Agency/Group/Organization Type	Housing Services - Housing Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Persons with HIV/AIDS Services-Victims of Domestic Violence Services-homeless Services-Health Service-Fair Housing Services - Victims
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Non-Homeless Special Needs Market Analysis Economic Development Anti-poverty Strategy Lead-based Paint Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	This organization was contacted via email. The City anticipates that those consulted will provide comments regarding their own areas of expertise to improve the programming and outcomes of the 2021 Annual Action Plan.

13	Agency/Group/Organization	VILLAGE OF BARTONVILLE
	Agency/Group/Organization Type	Other government - Local
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Non-Homeless Special Needs Market Analysis Economic Development Anti-poverty Strategy Lead-based Paint Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	This organization was contacted via email. The City anticipates that those consulted will provide comments regarding their own areas of expertise, which will improve coordination and cooperation among local governments to improve the programming and outcomes of the 2021 Annual Action Plan.
14	Agency/Group/Organization	City of West Peoria
	Agency/Group/Organization Type	Other government - Local

	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Non-Homeless Special Needs Market Analysis Economic Development Anti-poverty Strategy Lead-based Paint Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	This organization was contacted via email. The City anticipates that those consulted will provide comments regarding their own areas of expertise and this will improve coordination and cooperation among local governments to improve the programming and outcomes of the 2021 Annual Action Plan.
15	Agency/Group/Organization	Illinois Department of Public Health
	Agency/Group/Organization Type	Other government - State

	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Non-Homeless Special Needs Market Analysis Economic Development Anti-poverty Strategy Lead-based Paint Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	This organization was contacted via email. The City anticipates that those consulted will provide comments regarding their own areas of expertise and this will improve coordination and cooperation among governments to improve the programming and outcomes of the 2021 Annual Action Plan.
16	Agency/Group/Organization	Illinois Department of Commerce and Economic Opportunity
	Agency/Group/Organization Type	Other government - State
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Non-Homeless Special Needs Market Analysis Economic Development 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?	This organization was contacted via email. The City anticipates that those consulted will provide comments regarding their own expertise and this will improve coordination and cooperation among governments to improve the programming and outcomes of the 2021 Annual Action Plan.

17	Agency/Group/Organization	Illinois Housing Development Authority
	Agency/Group/Organization Type	Housing Services - Housing Service-Fair Housing Other government - State
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Non-Homeless Special Needs Market Analysis Economic Development 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?	This organization was contacted via email. The City anticipates that those consulted will provide comments regarding their own areas of expertise, which will improve coordination and cooperation among local governments to improve the programming and outcomes of the 2021 Annual Action Plan.
18	Agency/Group/Organization	Greater Peoria Airport
	Agency/Group/Organization Type	Regional organization
	What section of the Plan was addressed by Consultation?	Market Analysis Economic Development 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?	This organization was contacted via email. The City anticipates that those consulted will provide comments regarding their own areas of expertise to improve the programming and outcomes of the 2021 Annual Action Plan.

19	Agency/Group/Organization	Central Illinois Agency on Aging, Inc.
	Agency/Group/Organization Type	Services - Housing Services-Elderly Persons Services-Persons with Disabilities Services-Health Other government - State
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Market Analysis Economic Development Anti-poverty Strategy Lead-based Paint Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	This organization was contacted via email. The City anticipates that those consulted will provide comments regarding their own areas of expertise to improve the programming and outcomes of the 2021 Annual Action Plan.
20	Agency/Group/Organization	Illinois Historic Preservation Agency
	Agency/Group/Organization Type	Other government - State
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	This organization was contacted via email. The City anticipates that those consulted will provide comments regarding their own areas of expertise and this will improve coordination and cooperation among governments to improve the programming and outcomes of the 2021 Annual Action Plan.

21	Agency/Group/Organization	University of Illinois College of Medicine
	Agency/Group/Organization Type	Services-Health Services-Education Health Agency
	What section of the Plan was addressed by Consultation?	Homeless Needs - Families with children Homelessness Needs - Unaccompanied youth
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	This organization was contacted via email. The City anticipates that those consulted will provide comments regarding their own areas of expertise to improve the programming and outcomes of the 2021 Annual Action Plan.
22	Agency/Group/Organization	AMERICAN RED CROSS
	Agency/Group/Organization Type	Services-Health Services-Education Health Agency Regional organization
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Market Analysis 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?	This organization was contacted via email. The City anticipates that those consulted will provide comments regarding their own areas of expertise to improve the programming and outcomes of the 2021 Annual Action Plan.
23	Agency/Group/Organization	BOYS & GIRLS CLUB
	Agency/Group/Organization Type	Services-Children Services-Education Regional organization

	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homeless Needs - Families with children Homelessness Needs - Unaccompanied youth 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?	This organization was contacted via email. The City anticipates that those consulted will provide comments regarding their own areas of expertise to improve the programming and outcomes of the 2021 Annual Action Plan.
24	Agency/Group/Organization	CATHOLIC CHARITIES
	Agency/Group/Organization Type	Services - Housing Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Victims of Domestic Violence Services-homeless Services-Health Services - Victims Regional organization Religious Organization
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Non-Homeless Special Needs 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?	This organization was contacted via email. The City anticipates that those consulted will provide comments regarding their own areas of expertise to improve the programming and outcomes of the 2021 Annual Action Plan.
25	Agency/Group/Organization	Children's Home Association of Illinois
	Agency/Group/Organization Type	Services-Children Child Welfare Agency
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homeless Needs - Families with children Homelessness Needs - Unaccompanied youth 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?	This organization was contacted via email. The City anticipates that those consulted will provide comments regarding their own areas of expertise to improve the programming and outcomes of the 2021 Annual Action Plan.
26	Agency/Group/Organization	COMMUNITY WORKSHOP & TRAINING CENTER, INC.
	Agency/Group/Organization Type	Services - Housing Services-Children Services-Persons with Disabilities Services-Education Services-Employment

	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Non-Homeless Special Needs Market Analysis Economic Development 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?	This organization was contacted via email. The City anticipates that those consulted will provide comments regarding their own areas of expertise to improve the programming and outcomes of the 2021 Annual Action Plan.
27	Agency/Group/Organization	CRITTENTON CENTERS
	Agency/Group/Organization Type	Services-Children Services-Persons with Disabilities Services-Victims of Domestic Violence Services-Health Services-Education Services - Victims Child Welfare Agency

	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Unaccompanied youth Homelessness Strategy Market Analysis Economic Development 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?	This organization was contacted via email. The City anticipates that those consulted will provide comments regarding their own areas of expertise to improve the programming and outcomes of the 2021 Annual Action Plan.
28	Agency/Group/Organization	Dream Center Peoria
	Agency/Group/Organization Type	Services - Housing Services-Children Services-Persons with Disabilities Services-homeless Services-Education Religious Organization
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Non-Homeless Special Needs 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?	This organization was contacted via email. The City anticipates that those consulted will provide comments regarding their own areas of expertise to improve the programming and outcomes of the 2021 Annual Action Plan.
29	Agency/Group/Organization	EAST BLUFF NEIGHBORHOOD HOUSING SER
	Agency/Group/Organization Type	Housing Services - Housing Services-Persons with Disabilities Services-homeless Service-Fair Housing Planning organization
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Non-Homeless Special Needs Market Analysis Economic Development 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?	This organization was contacted via email. The City anticipates that those consulted will provide comments regarding their own areas of expertise to improve the programming and outcomes of the 2021 Annual Action Plan.

30	Agency/Group/Organization	COUNSELING & FAMILY SERVICES dba: Family Core
	Agency/Group/Organization Type	Services-Children Services-homeless Services-Education Child Welfare Agency
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Unaccompanied youth Homelessness Strategy Non-Homeless Special Needs 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?	This organization was contacted via email. The City anticipates that those consulted will provide comments regarding their own areas of expertise to improve the programming and outcomes of the 2021 Annual Action Plan.
31	Agency/Group/Organization	GLEN OAK CHRISTIAN CHURCH
	Agency/Group/Organization Type	Services - Housing Services-Children Services-Education Religious Organization

	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Non-Homeless Special Needs Economic Development 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?	This organization was contacted via email. The City anticipates that those consulted will provide comments regarding their own areas of expertise to improve the programming and outcomes of the 2021 Annual Action Plan.
32	Agency/Group/Organization	GOODWILL
	Agency/Group/Organization Type	Services-Persons with Disabilities Services-homeless Services-Education Services-Employment

	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Non-Homeless Special Needs Market Analysis Economic Development 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?	This organization was contacted via email. The City anticipates that those consulted will provide comments regarding their own areas of expertise to improve the programming and outcomes of the 2021 Annual Action Plan.
33	Agency/Group/Organization	GREATER PEORIA FAMILY YMCA
	Agency/Group/Organization Type	Services-Children Services-Health Services-Education Regional organization

	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Non-Homeless Special Needs Economic Development 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?	This organization was contacted via email. The City anticipates that those consulted will provide comments regarding their own areas of expertise to improve the programming and outcomes of the 2021 Annual Action Plan.
34	Agency/Group/Organization	HABITAT FOR HUMANITY GREATER PEORIA AREA
	Agency/Group/Organization Type	Housing Services - Housing Services-homeless Service-Fair Housing Community Housing Development Organization

	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Non-Homeless Special Needs Market Analysis Economic Development 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?	This organization was contacted via email. The City anticipates that those consulted will provide comments regarding their own areas of expertise to improve the programming and outcomes of the 2021 Annual Action Plan.
35	Agency/Group/Organization	HAND UP DEVELOPMENT CORP
	Agency/Group/Organization Type	Services-Children Services-Health
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Non-Homeless Special Needs Economic Development 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?	This organization was contacted via email. The City anticipates that those consulted will provide comments regarding their own areas of expertise to improve the programming and outcomes of the 2021 Annual Action Plan.
36	Agency/Group/Organization	Heartland Health Services
	Agency/Group/Organization Type	Services-Health Health Agency
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Non-Homeless Special Needs Market Analysis Economic Development 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?	This organization was contacted via email. The City anticipates that those consulted will provide comments regarding their own areas of expertise to improve the programming and outcomes of the 2021 Annual Action Plan.
37	Agency/Group/Organization	Hult Center for Healthy Living
	Agency/Group/Organization Type	Services-Children Services-Elderly Persons Services-Health Services-Education Health Agency

	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Non-Homeless Special Needs Market Analysis Economic Development 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?	This organization was contacted via email. The City anticipates that those consulted will provide comments regarding their own areas of expertise to improve the programming and outcomes of the 2021 Annual Action Plan.
38	Agency/Group/Organization	Human Service Center
	Agency/Group/Organization Type	Services-Elderly Persons Services-Persons with Disabilities Services-homeless Services-Health Health Agency

	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Non-Homeless Special Needs Economic Development 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?	This organization was contacted via email. The City anticipates that those consulted will provide comments regarding their own areas of expertise to improve the programming and outcomes of the 2021 Annual Action Plan.
39	Agency/Group/Organization	METEC
	Agency/Group/Organization Type	Services - Housing Services-homeless Service-Fair Housing

	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Non-Homeless Special Needs Market Analysis Economic Development 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?	This organization was contacted via email. The City anticipates that those consulted will provide comments regarding their own areas of expertise to improve the programming and outcomes of the 2021 Annual Action Plan.
40	Agency/Group/Organization	NEIGHBORHOOD HOUSE
	Agency/Group/Organization Type	Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-homeless Services-Health Services-Education Services-Employment

	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Non-Homeless Special Needs Economic Development 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?	This organization was contacted via email. The City anticipates that those consulted will provide comments regarding their own areas of expertise to improve the programming and outcomes of the 2021 Annual Action Plan.
41	Agency/Group/Organization	PCCEO
	Agency/Group/Organization Type	Services - Housing Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-homeless Services-Health Services-Education

	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Non-Homeless Special Needs Market Analysis Economic Development 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?	This organization was contacted via email. The City anticipates that those consulted will provide comments regarding their own areas of expertise to improve the programming and outcomes of the 2021 Annual Action Plan.
42	Agency/Group/Organization	U OF I PEDIATRIC RESOURCE CENTER
	Agency/Group/Organization Type	Services-Children Services-Victims of Domestic Violence Services - Victims Health Agency
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Unaccompanied youth Homelessness Strategy Non-Homeless Special Needs 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?	This organization was contacted via email. The City anticipates that those consulted will provide comments regarding their own areas of expertise to improve the programming and outcomes of the 2021 Annual Action Plan.
43	Agency/Group/Organization	PEORIA FRIENDSHIP HOUSE OF CHRISTIAN SERVICE
	Agency/Group/Organization Type	Services-Children Services-Persons with Disabilities Services-homeless Services-Health Services-Education Services-Employment Religious Organization
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Non-Homeless Special Needs Economic Development 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?	This organization was contacted via email. The City anticipates that those consulted will provide comments regarding their own areas of expertise to improve the programming and outcomes of the 2021 Annual Action Plan.

44	Agency/Group/Organization	South Side Office of Concern
	Agency/Group/Organization Type	Housing Services - Housing Services-Persons with Disabilities Services-homeless Service-Fair Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Non-Homeless Special Needs Market Analysis Economic Development 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?	Now known as Phoenix Community Development Services. This organization was contacted via email. The City anticipates that those consulted will provide comments regarding their own areas of expertise to improve the programming and outcomes of the 2021 Annual Action Plan.

45	Agency/Group/Organization	PLANNED PARENTHOOD HEART OF ILLINOIS
	Agency/Group/Organization Type	Services-Children Services-Persons with Disabilities Services-Persons with HIV/AIDS Services-Victims of Domestic Violence Services-Health Services-Education Services - Victims Health Agency
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Non-Homeless Special Needs Economic Development 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?	This organization was contacted via email. The City anticipates that those consulted will provide comments regarding their own areas of expertise to improve the programming and outcomes of the 2021 Annual Action Plan.

46	Agency/Group/Organization	PRAIRIE STATE LEGAL SERVICES
	Agency/Group/Organization Type	Services - Housing Services-Persons with Disabilities Services-Victims of Domestic Violence Service-Fair Housing Services - Victims Business Leaders Civic Leaders Business and Civic Leaders
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Non-Homeless Special Needs Market Analysis Economic Development 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?	This organization was contacted via email. The City anticipates that those consulted will provide comments regarding their own areas of expertise to improve the programming and outcomes of the 2021 Annual Action Plan.

47	Agency/Group/Organization	THE SALVATION ARMY - PEORIA
	Agency/Group/Organization Type	Services - Housing Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Victims of Domestic Violence Services-homeless Services-Health Services-Education Services - Victims Regional organization Religious Organization
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Non-Homeless Special Needs Market Analysis Economic Development 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?	This organization was contacted via email. The City anticipates that those consulted will provide comments regarding their own areas of expertise to improve the programming and outcomes of the 2021 Annual Action Plan.

48	Agency/Group/Organization	Heart of IL United Way
	Agency/Group/Organization Type	Services - Housing Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Persons with HIV/AIDS Services-Victims of Domestic Violence Services-homeless Services-Health Services-Education Services-Employment Service-Fair Housing Services - Victims Regional organization Planning organization Civic Leaders
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Non-Homeless Special Needs Market Analysis Economic Development Anti-poverty 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?</p>	<p>This organization was contacted via email. The City anticipates that those consulted will provide comments regarding their own areas of expertise to improve the programming and outcomes of the 2021 Annual Action Plan.</p>
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Identify any Agency Types not consulted and provide rationale for not consulting

There were not any agency types that were not consulted.

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

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Continuum of Care	Heart of Illinois United Way	The goal of the Heart of Illinois Continuum of Care is to end homelessness by ensuring access to permanent, safe, and affordable housing. This overlaps with the goals of the City's HESG program funding.
City of Peoria Comprehensive Plan	City of Peoria	The goals of the Strategic Plan have been developed in concert with those contained in the City of Peoria Comprehensive Plan in order to address critical issues.

Table 3 – Other local / regional / federal planning efforts

Narrative (optional)

AP-12 Participation – 91.105, 91.200(c)

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

For the creation of the 2021 Annual Action Plan, the City of Peoria conducted a robust citizen participation outreach strategy.

After the development of the plan, the 30-day comment period included virtual public hearings and consultation with local organizations. The virtual public hearings were held in accordance with HUD Notice CPD 21-02 due to the ongoing COVID-19 pandemic. These hearings were held virtually since in-person meetings are restricted by health authorities to ensure citizens are given the opportunity to register their comments. The first virtual hearing was held on Wednesday, March 10, 2021 at 5:30 PM. The second virtual hearing was held on Tuesday, March 16, 2021 at 10:00 AM. These hearings were held to obtain citizen comments on issues related to the housing, non-housing, and community development needs in the City and for the public to comment on the development of the 2021 Annual Action Plan. Public notices for the hearings were published in the Peoria Journal Star newspaper.

Emails were also used to gain input from entities with specific expertise, including but not limited to, those in the areas of housing, non-housing, community development, homelessness, and the near homeless. This effort met and exceeded the requirements of the City's Citizen Participation Plan and provided meaningful input for the creation of the 2021 Annual Action Plan.

A draft copy of the 2021 Annual Action Plan was made available for public review and comment. Public notice of the 30-day comment period was published in the Peoria Journal Star newspaper. Copies of the 2021 Annual Action Plan were available for review at the following locations: City of Peoria Community Development Department's office, City of Peoria website. The public comment period ran from Wednesday, March 3, 2021 to Saturday, April 3, 2021 at 5:00 PM.

There are no Colonias (unregulated housing settlements) in the City, and therefore, no related consultation was required.

Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
1	Newspaper Ad	Non-targeted/broad community	Published Legal Notice in Peoria Journal Star regarding open public comment period of the City's 2021 Annual Action Plan.	No emailed comments were received.	No comments received.	
2	Public Hearing	Non-targeted/broad community	Two virtual public hearings were held for public comment on the draft 2021 Annual Action Plan. The first hearing was held on Wednesday, March 10, 2021 at 5:30 PM, and the second was held on Tuesday, March 16, 2021 at 10:00 AM. Legal Notice of the virtual public hearings were published on March 3, 2021 in the Peoria Journal Star.	Questions were received regarding the public service funding process and timeline.	All comments were accepted and responses provided to questions. Please see the attachments sections for full minutes of the public hearings.	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (if applicable)
3	Emails	Non-targeted/broad community	Emails were sent to state and local agencies as well as area non-profit organizations soliciting comments on the draft 2021 Annual Action Plan. A list of agencies and organizations contacted are included in section AP-10: Consultation.	No emailed comments were received.	No comments received.	

Table 4 – Citizen Participation Outreach

Expected Resources

AP-15 Expected Resources – 91.220(c)(1,2)

Introduction

On February 25, 2021, the Office of Community Planning and Development for HUD announced the FY 2021 formula allocations for Community Development Block Grant (CDBG), HOME Investment Partnership (HOME) and Emergency Solutions Grant (ESG) programs. Per the announcement, the City anticipates receiving the following amounts for its 2021 program year: \$1,895,739 in CDBG funds; \$663,810 in HOME funds; and \$157,667 in ESG funds. The City's 2021 program year is from January 1, 2021 to December 31, 2021.

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	1,895,739	0	0	1,895,739	5,304,261	Prior year resources are being reallocated to Public Facilities and Improvements.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	663,810	0	0	663,810	1,976,190	There are no prior year resources that are to be reallocated.
ESG	public - federal	Conversion and rehab for transitional housing Financial Assistance Overnight shelter Rapid re-housing (rental assistance) Rental Assistance Services Transitional housing	157,667	0	0	157,667	422,333	There are no prior year resources that are to be reallocated.
Other	public - federal	Other	0	0	0	0	0	

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

The federal funds identified above will be leveraged with additional private, state, and local funds.

The City allocates approximately \$200,000 in corporate funds annually for supportive neighborhood development activities, including but not limited to, crime prevention, public safety initiatives, housing rehabilitation, and capacity building of organizations. The combined investment of corporate, state, and federal funds into Peoria neighborhoods yields holistic and sustainable results.

Match Requirements:

The CDBG program has no regulatory match requirement. However, for most activities, CDBG is not the sole funding source. For example, CDBG-funded public service activities require that CDBG funds be no more than 50% of the program's total budget. Therefore, an organization's other financial sources are additional contributions to the CDBG-funded public service programs. Additionally, the 2021 match provided for Peoria City/County Health Department lead hazard control program will leverage an anticipated grant award of over \$3.5 million for the \$150,000 of CDBG invested for match.

The HOME regulatory match is 25% of the total grant expenditures in a program year, excluding administrative costs. On an annual basis, HUD publishes the HOME match reduction list, which includes match reductions granted to certain communities due to fiscal distress, severe fiscal distress, and Presidential disaster declarations. Fiscal distress of a community is based upon the percentage of families in poverty. For program year 2020, the City was included on the FY 2020 HOME Match Reduction List at a match reduction of 50%, resulting in a total match requirement of 12.5% for the 2019 program year. The City has received this match reduction since the 2003 program year. FY 2021 HOME match reductions have not been released. HOME match is achieved through cash contributions from non-Federal sources from HOME-funded organizations. Match may also be achieved from prior year match balances.

The ESG regulatory match requirement is 100% of the total grant expenditures in a program year. This match is achieved through cash contributions of other non-ESG HUD funds, other Federal funds, State government funds, and private funds provided by the City and ESG subrecipient organizations. Match funds from previous years have included funds from the State of Illinois Department of Commerce and Economic Opportunity (DCEO), the City of Peoria, the Illinois Department of Human Services (IDHS), the Federal Emergency Management Agency (FEMA), the local United Way and private funds of a subrecipient organization.

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

The City's Community Development Department manages the real estate function of City-owned land and property. In discussions with the City's certified CHDOs, lack of site control has been cited as a potential barrier to project development. For CHDO activities, the City may donate property to a CHDO for in-fill, new construction of single-family homes. In areas with neighborhood planning efforts, no land will be transferred until neighborhood planning efforts are completed. As organizations approach the City for applications for state or federal tax credits, the City works with the developers to identify potential City-owned lots that could be donated to the project. In addition to CHDO projects, the City operates a rehabilitation program for City-owned properties the City acquires through the abandoned property process via demolition court. The program allows qualified individuals, neighborhood associations, nonprofits, and development firms to submit proposals for rehab as an alternative to demolition. These properties are now listed with a realtor to gain more interest in rehabilitating them, many of which are located in low-income areas.

Discussion

No additional discussion.

Annual Goals and Objectives

AP-20 Annual Goals and Objectives

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Housing Rehabilitation	2020	2024	Affordable Housing		Housing Rehabilitation	CDBG: \$1,181,837	Homeowner Housing Rehabilitated: 35 Household Housing Unit Housing Code Enforcement/Foreclosed Property Care: 2100 Household Housing Unit
2	Focus Area Housing Leverage	2020	2024	Affordable Housing		Affordable Housing Public Facilities and Improvements	CDBG: \$380,002 HOME: \$603,810	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 1000 Persons Assisted Rental units constructed: 4 Household Housing Unit Rental units rehabilitated: 2 Household Housing Unit Homeowner Housing Added: 1 Household Housing Unit
3	Public Service	2020	2024	Non-Housing Community Development		Public Service	CDBG: \$283,900	Public service activities other than Low/Moderate Income Housing Benefit: 1000 Persons Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
4	Homeless Services	2020	2024	Homeless		Homeless Services	ESG: \$157,667	Tenant-based rental assistance / Rapid Rehousing: 15 Households Assisted Homeless Person Overnight Shelter: 1000 Persons Assisted
5	Demolition	2020	2024	Affordable Housing		Demolition	CDBG: \$50,000	Buildings Demolished: 5 Buildings

Table 6 – Goals Summary

Goal Descriptions

1	Goal Name	Housing Rehabilitation
	Goal Description	This goal will address the need for housing rehabilitation for owner-occupied homes within the City of Peoria in order to create decent, affordable housing. Code enforcement activities will also help the rehabilitation of rental units. This goal includes project delivery and administrative funds.
2	Goal Name	Focus Area Housing Leverage
	Goal Description	This goal is to focus funds in specific areas of town to concentrate funding to create larger impact projects. In addition, the projects and activities in this goal will seek to leverage funds in addition to HOME and CDBG funds in order to make a greater impact on the City of Peoria residents. Finally, this goal will also include funding for Community Housing Development Organizations (CHDO).
3	Goal Name	Public Service
	Goal Description	The goal is to provide public service activities to support low-income persons within the City of Peoria

4	Goal Name	Homeless Services
	Goal Description	This goal is to provide services to homeless individuals and families and connect them with permanent housing.
5	Goal Name	Demolition
	Goal Description	This goal is to eliminate deteriorated and blighted structures within the City of Peoria. The program will eliminate substandard housing in order to create a more suitable living environment for neighbors around the blighted structure

Projects

AP-35 Projects – 91.220(d)

Introduction

The projects listed below will address the high priority needs in 2021.

Projects

#	Project Name
1	Housing Rehabilitation
2	PCCHD Lead Match Program
3	Competitive Grant Program
4	CHDO
5	Parkwood Commons
6	Public Service
7	ESG21 Peoria
8	Demolition
9	Code Enforcement
10	Planning/General Administration
11	Housing Rehabilitation Delivery

Table 7 - Project Information

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

These allocation priorities address the identified needs from the 2020 Consolidated Plan. The Plan included a robust citizen participation process and included stakeholder input. These priorities are reflective of that input.

A known obstacle in addressing these needs is the extremely large gap between resources and demonstrated need. As funding from previous grant allocations remains the same or slightly increases, the community's request for services continues to increase. This is a common issue with the City's housing rehab programs, as there is often a greater number of individuals in need of assistance compared to the amount of funds expendable. To overcome this, the City has established a double dipping policy, which mandates that a household can receive assistance through its various programming once every five years. Further, although housing rehab programs can assist households earning up to 80% of area median income, the City restricts some of its housing rehab programs to serving households at or below 50% of the area median income. The double dipping policy aims to ensure that resources are evenly spread out among residents in greatest need of assistance. In addition,

the City seeks to leverage its funding with other funding sources as much as possible. For example, the partnership with the Health Department seeks to leverage Lead Hazard Control grant funding with CDBG funding to leave a house completely up to code once all the work is completed.

AP-38 Project Summary
Project Summary Information

1	Project Name	Housing Rehabilitation
	Target Area	
	Goals Supported	Housing Rehabilitation
	Needs Addressed	Housing Rehabilitation
	Funding	CDBG: \$361,837
	Description	This project needs will address the need for housing rehabilitation for owner-occupied homes within the City of Peoria in order to create decent, affordable housing. Rehabilitation activities such as roof replacement, water heater replacement, lead abatement, ramp installations, energy efficiency, and others will be offered to low-income households throughout the City. Funds may also be used to help leverage other rehab programs for City of Peoria residents.
	Target Date	10/31/2023
	Estimate the number and type of families that will benefit from the proposed activities	Approximately 14 low income families will be assisted through this project.
	Location Description	These programs will be available City wide to income qualifying households.
	Planned Activities	Activities will address the need for housing rehabilitation for owner-occupied homes within the City of Peoria in order to create decent, affordable housing. Rehabilitation activities such as roof replacement, water heater replacement, lead abatement, ramp installations, energy efficiency, and other rehabilitation improvements will be offered to low-income households throughout the City
2	Project Name	PCCHD Lead Match Program
	Target Area	
	Goals Supported	Housing Rehabilitation
	Needs Addressed	Housing Rehabilitation
	Funding	CDBG: \$150,000

	Description	This project will provide matching funds to the Peoria City/County Health Department's (PCCHD) Lead Hazard Control grant and the lead abatement activity serving low-income homeowners. The activity is city-wide but will primarily serve the zip codes 61606 and 61603 which have the highest number of reported child lead poisoning in Peoria County. All households must be at or below 80% AMI.
	Target Date	12/31/2022
	Estimate the number and type of families that will benefit from the proposed activities	Approximately 12 low-income households will be assisted with this project.
	Location Description	The activity is city-wide but will primarily serve the zip codes 61606 and 61603 which have the highest number of reported child lead poisoning in Peoria County.
	Planned Activities	Matching funds provided to eligible participants in the health department's lead hazard control grant program.
3	Project Name	Competitive Grant Program
	Target Area	
	Goals Supported	Focus Area Housing Leverage
	Needs Addressed	Affordable Housing Public Facilities and Improvements
	Funding	CDBG: \$380,002 HOME: \$343,810
	Description	The Competitive Grant program for 2021 provides HOME and CDBG funding in a targeted funding release. The program will utilize neighborhood planning efforts or other coordinated investment strategies to provide funding for eligible projects.
	Target Date	10/31/2023
	Estimate the number and type of families that will benefit from the proposed activities	Over one hundred fifty individuals will benefit from this activity.
	Location Description	The program will utilize neighborhood planning efforts or other coordinated investment strategies to provide funding for eligible projects.

	Planned Activities	The Competitive Grant program for 2021 provides HOME and CDBG funding in a targeted funding release. The program will utilize neighborhood planning efforts or other coordinated investment strategies to provide funding for eligible projects.
4	Project Name	CHDO
	Target Area	
	Goals Supported	Focus Area Housing Leverage
	Needs Addressed	Affordable Housing
	Funding	HOME: \$110,000
	Description	This project will provide funding to local Community Housing Development Organizations to create to retain affordable housing. CHDOs must meet all federal requirements in order to meet the CHDO definition to be eligible for funding.
	Target Date	12/31/2022
	Estimate the number and type of families that will benefit from the proposed activities	Approximately one family will benefit from this project.
	Location Description	
Planned Activities	This project will provide funding to local Community Housing Development Organizations to create to retain affordable housing. CHDOs must meet all federal requirements in order to meet the CHDO definition to be eligible for funding.	
5	Project Name	Parkwood Commons
	Target Area	
	Goals Supported	Focus Area Housing Leverage
	Needs Addressed	Affordable Housing
	Funding	HOME: \$150,000
	Description	This project is a rehabilitation of an affordable housing complex located at 1617 North Great Oak Road. Due to unexpected rehabilitation costs of sewer line replacements, plumbing line replacements, mold remediation, and asbestos removal additional funding is being provided to this project.
	Target Date	12/31/2021

	Estimate the number and type of families that will benefit from the proposed activities	Two low-low income families will benefit from this project.
	Location Description	The project will take place at the apartment complex located near 1617 North Great Oak Road.
	Planned Activities	This project is a rehabilitation of an affordable housing complex located at 1617 North Great Oak Road. Due to unexpected rehabilitation costs of sewer line replacements, plumbing line replacements, mold remediation, and asbestos removal additional funding is being provided to this project.
6	Project Name	Public Service
	Target Area	
	Goals Supported	Public Service
	Needs Addressed	Public Service
	Funding	CDBG: \$283,900
	Description	This project will provide public service activities to support low-income persons within the City of Peoria. The applications for public service funding are reviewed by a City Commission and their funding recommendations approved by City Council.
	Target Date	12/31/2021
	Estimate the number and type of families that will benefit from the proposed activities	Approximately 1100 individuals will be benefit from this project.
	Location Description	Services are available City-wide to income eligible individuals.
Planned Activities	This project will provide public service activities to support low-income persons within the City of Peoria. The applications for public service funding are reviewed by a City Commission and their funding recommendations approved by City Council.	
7	Project Name	ESG21 Peoria
	Target Area	
	Goals Supported	Homeless Services
	Needs Addressed	Homeless Services

	Funding	ESG: \$157,667
	Description	This project will provide services to homeless individuals and families and connect them with permanent housing. Applications will be reviewed by the CoC Governing Board and funding recommendations approved by City Council. These funds will be used for programs and City administration under the 7.5% cap. For 202114, \$10,500 is budgeted for administration which is under the 7.5% cap of \$11,037. The shelter operations and street outreach component will also be under the 60% cap of \$88,300.
	Target Date	12/31/2022
	Estimate the number and type of families that will benefit from the proposed activities	Approximately 15 very low-income households will be assisted through Rapid Rehousing and 1100 individuals through homeless shelter.
	Location Description	
	Planned Activities	This project will provide services to homeless individuals and families and connect them with permanent housing. Applications will be reviewed by the CoC Governing Board and funding recommendations approved by City Council. These funds will be used for programs and City administration.
8	Project Name	Demolition
	Target Area	
	Goals Supported	Demolition
	Needs Addressed	Demolition
	Funding	CDBG: \$50,000
	Description	This project will eliminate deteriorated and blighted structures within the City of Peoria. The program will eliminate substandard housing in order to create a more suitable living environment for neighbors around the blighted structure.
	Target Date	12/31/2022
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	Demolition will be conducted on a spot basis where needed.

	Planned Activities	This project will eliminate deteriorated and blighted structures within the City of Peoria. The program will eliminate substandard housing in order to create a more suitable living environment for neighbors around the blighted structure.
9	Project Name	Code Enforcement
	Target Area	
	Goals Supported	Housing Rehabilitation
	Needs Addressed	Housing Rehabilitation
	Funding	CDBG: \$300,000

<p>Description</p>	<p>This activity will include code enforcement inspections and staff related costs. This activity will only occur in the CDBG Target Area (low-income area, where 51% or more of the resident households have reported incomes at 80% or below area median income; see attached area map in section AP05: Executive Summary of this Annual Action Plan) of the City that would be considered deteriorated or deteriorating. To document other public and private improvements, rehabilitation or services that were provided to arrest the decline of the area, in addition to code enforcement, staff will compile, to the greatest extent possible, the following information: 1) Number of building permits issued and value of permits in the eligible CDBG Code Enforcement Area. 2) Number of demolitions and costs in the eligible CDBG Code Enforcement Area. 3) Rehabilitation/new construction projects funded with CDBG or HOME funds in the eligible CDBG Code Enforcement Area. 4) Number of Police Services (based on dispatched calls or offered programs) in the eligible CDBG Code Enforcement Area. 5) Number of Fire/EMT Services (based on dispatched calls) in the eligible CDBG Code Enforcement Area. 6) Project descriptions and monetary value of other neighborhood stabilization efforts conducted by the City and/or its community partners in the eligible CDBG Code Enforcement Area. 7) Project descriptions and monetary value of infrastructure improvements conducted by City Public Works or State of Illinois Department of Transportation in the eligible CDBG Code Enforcement Area. 8) Economic Development activities (job creation, new businesses, facade improvements, etc.) in the eligible CDBG Code Enforcement Area. 9) other code enforcement activities (number of inspections, vacant lot maintenance, code sweeps, zoning enforcement, etc.) conducted by the City that was funded with non-CDBG funds in the eligible CDBG Code Enforcement Area. This information will be compiled annually and recorded in the Code Enforcement IDIS activity and project file</p>
<p>Target Date</p>	<p>12/31/2022</p>
<p>Estimate the number and type of families that will benefit from the proposed activities</p>	
<p>Location Description</p>	<p>The project will take place with the low-income neighborhoods of the City of Peoria.</p>

	Planned Activities	This activity will include staff related costs for code enforcement actions. This activity will only occur in the CDBG Target Area (low income area - where 51% or more of the resident households have reported incomes at 80% or less than the area median income for Peoria County) of the City that would be considered deteriorated or deteriorating.
10	Project Name	Planning/General Administration
	Target Area	
	Goals Supported	Housing Rehabilitation
	Needs Addressed	Housing Rehabilitation
	Funding	CDBG: \$310,000 HOME: \$60,000
	Description	This activity is to ensure the CDBG and HOME grants and their associated activities are properly planned and administered. Please note that ESG planning/general administration is included under the HESG Strategic Plan Goal and the ESG21 activity. The total amount of administration allocated to ESG is \$10,500 for program year 2021.
	Target Date	12/31/2022
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	This activity is to ensure the CDBG and HOME grants and their associated activities are properly planned and administered. Please note that ESG planning/general administration is included under the HESG Strategic Plan Goal and the ESG21 activity. The total amount of administration allocated to ESG is \$10,500 for program year 2021.
11	Project Name	Housing Rehabilitation Delivery
	Target Area	
	Goals Supported	Housing Rehabilitation
	Needs Addressed	Housing Rehabilitation
	Funding	CDBG: \$60,000

	Description	This activity is for City staff costs associated with the housing rehab programs funded with CDBG. It is designed to ensure that the housing rehabilitation activities are properly inspected and administered.
	Target Date	12/31/2022
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	This activity is for City staff costs associated with the housing rehab programs funded with CDBG. It is designed to ensure that the housing rehabilitation activities are properly inspected and administered.

AP-50 Geographic Distribution – 91.220(f)

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

Currently, the City is not implementing any official HUD designated geographic based priority areas such as NRSAs or Empowerment Zones.

Allocations and program activities are funded City wide in accordance with income eligibility requirements per HUD regulations. Going forward, however, there will be intentional application of the following principles to help address the disparities of access to services, housing and community infrastructure:

1. The City's Community Needs survey in the 2020 Consolidated Plan identified local neighborhoods that the community identified as target areas for federal funding. Over 60% of respondents indicated funding should be focused on the Southside of Peoria with an additional 27% indicating funding should be targeted in the East Bluff neighborhood and 6% identified the Near Northside. To address these needs, the City has focused on creating Notices of Funding Availability based on neighborhood plans in these areas.
2. High cost was identified in the Community Needs survey as the top barrier for being unable to find decent, affordable housing. The City will continue to seek out opportunities to offer gap financing to larger affordable housing development projects in order to increase the number of new affordable housing units available in the community. In addition, rehabilitation programs for homeowners will continue as that was one of the top needs from the survey. Code enforcement for rental properties will continue to seek to improve housing stock in order to remain in current affordable housing based on the survey results and additional feedback question on the survey.

Geographic Distribution

Target Area	Percentage of Funds

Table 8 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

Please see above.

Discussion

No additional discussion.

Affordable Housing

AP-55 Affordable Housing – 91.220(g)

Introduction

The 2021 Annual Action Plan will address affordable housing for homeless, low-income (non-homeless) and special needs households through the creation of new units, rehabilitation of existing units and short-term/intermediate-term rental assistance.

One Year Goals for the Number of Households to be Supported	
Homeless	15
Non-Homeless	19
Special-Needs	0
Total	34

Table 9 - One Year Goals for Affordable Housing by Support Requirement

One Year Goals for the Number of Households Supported Through	
Rental Assistance	15
The Production of New Units	1
Rehab of Existing Units	20
Acquisition of Existing Units	0
Total	36

Table 10 - One Year Goals for Affordable Housing by Support Type

Discussion

The number of households to be supported as identified above include the following 2021 Annual Action Plan Projects:

Rental Assistance: ESG Rapid Rehousing Assistance - 15 homeless households

Production of New Units: CHDO activities - 1 unit

Rehab of Existing Units: Housing Rehabilitation Program - 14; PCCHD Lead Grant Match Program - 12; HOME Parkwood Commons units - 2

AP-60 Public Housing – 91.220(h)

Introduction

In its Five-Year Action Plan, the Peoria Housing Authority outlines a variety of goals. Among them are the redevelopment of Taft Homes, improvements to the interior and exterior of its extant structures, and deepening community partnerships and leveraging collective impact. PHA will continue to administer its Homeownership Program which assists families and households through the home-buying and ownership process. In addition, PHA will work to reestablish resident councils at asset management property.

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

The Peoria Housing Authority has a variety of actions planned for the next year. The redevelopment of Taft Homes remains a key goal, as PHA will look to conduct environmental reviews for the site, explore demolition and reconstruction feasibility, and explore Rental Assistance Demonstration as a vehicle to further drive this work. Another action item is improving security administration and improving and upgrading the interior and exterior of its structures. PHA also looks to deepen its engagement with the local Continuum of Care and leverage partnerships with community and social service agencies.

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

The Peoria Housing Authority currently administers a Homeownership Program as part of its Housing Choice Voucher Program, which assists families through the home-buying and ownership process. PHA also offers the Family Self Sufficiency Program; has resource centers at Taft and Harrison Homes to connect residents with counseling, health, education, and job assistance; and is working to reestablish resident councils at each PHA site.

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

The Peoria Housing Authority currently has a troubled designation. With the appointment of PHA's Executive Director Jackie Newman, communications between PHA and the City of Peoria have greatly improved. Combined funding and resources from both PHA and the City are slated for East Bluff Housing, a thirty-unit project in Peoria's East Bluff neighborhood. PHA staff, including Director Newman, attended meetings on the Consolidated Plan that provided an overview of HUD funding, which were hosted and led by City staff in Peoria neighborhoods. Moving forward, the City and PHA aim to

strengthen this relationship by deepening inter-agency collaboration.

Discussion

No additional discussion.

AP-65 Homeless and Other Special Needs Activities – 91.220(i)

Introduction

The City of Peoria is a dedicated partner with the Heart of Illinois Continuum of Care in seeking to end homelessness in our community.

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

The City actively participates in the local Continuum of Care Point-in-Time Count. Additionally, the City requires a formerly homeless or currently homeless individual to participate on the board or subcommittee of all organizations funded through City ESG funds. Finally, all funded ESG subrecipients are required to document marketing of their programs and have a client intake form that determines individual or family self-sufficiency needs.

City grants staff have integrated City Code Inspectors into the homeless outreach effort, as Code Inspectors work most frequently on the ground in neighborhoods. Code Inspectors make referrals to grants staff or the coordinated entry system when they come into contact with an unsheltered person or a person living in a place not meant for human habitation, such as a car or shed. Sharing this kind of information and utilizing this internal network leads to better service delivery in the community, particularly to persons experiencing homelessness.

Addressing the emergency shelter and transitional housing needs of homeless persons

The City is actively involved in the Continuum of Care. The HUD funded shelters agreed on the need of an interim shelter model in which the shelters are open low barrier and are open 24/7. Case management services are provided to assist homeless individuals. Prior to this model, the shelters would only be open evening to morning leaving individuals having to find a place to go during the daytime hours.

Due to a shift in HUD priorities, the Continuum of Care ceased operation of almost all of the transitional housing units and converted them to permanent housing.

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

The City recognizes HUDs efforts to dedicate resources to rapid rehousing initiatives and has prioritized rapid rehousing activities to assist individuals and families from residing in emergency or transitional shelters for an extend period of time through ESG funding. Over the last few years, the Continuum implemented a coordinated entry system to ensure chronically homeless and other special needs are taken into account prioritization on the coordinated entry list.

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.

Due to declining HUD funding, the Continuum of Care and the City of Peoria agreed to not use City ESG funds for homeless prevention going forward. It was agreed that there are other funding sources available in the community for this such as state and private funds. Although there is never enough funding for this type of activity, the agreement was that the federal resources for the City should be used to assist those currently homeless.

The City seeks to remediate situations that, if not addressed properly, would lead to situations of homelessness for low-income families and individuals or households with other challenges to housing stability. The City uses the enforcement of its property maintenance code to ensure that private landlords don't let housing deteriorate into a situation that could lead to homelessness. In 2017, a new policy, collaboratively developed between grants and code inspection staff, clarifies procedures for managing landlords who have allowed a property to deteriorate to an uninhabitable condition. The procedure requires clearer communication between inspectors and landlords, uniform application of enforcement mechanisms and intensive monitoring of past cases. The goal of this policy is to prevent homelessness before it occurs, as well as to ensure that if a property is designated uninhabitable and is not remediated, that it be monitored so that it does not return to the rental market before necessary changes have been made to the unit(s). The City also partners with Prairie State Legal services to ensure that tenants have a resource for legal advice. This organization also receives funding for homeless prevention from other grant funding.

When the emergency shelters shifted to an interim model, another partnership was formed with a local hospital to provide funding for case managers from a nonprofit that is also a licensed mental health provider. Through this partnership, the hospital has a better working relationship with homeless providers for those in the emergency room. The additional case management has reduced the usage of the emergency department by some formerly homeless individuals by connecting them with stable housing and primary care providers. Although the data is small to date, the partnership hopes to

continue to improve outcomes for both the hospital and the homeless shelter.

Discussion

The following question is missing from the above questions.

Describe housing and supportive service actions for non-homeless special needs persons: elderly, frail elderly, persons with disabilities, person with HIV/AIDS and their families, and public housing residents.

As part of our rehabilitation programs, the City operates a ramp installation program and will continue this in 2021. This program is targeted towards individuals with disabilities, elderly, and frail elderly in order to ensure access to the home. The goal is to try to keep more individuals in their home if accessibility improvements makes that possible. This was on the City's top requested programs by the public and was brought back in 2017 in order to address this need.

In addition, these populations are the target of many of our 2021 public service programs. Public service funds are providing support for after school programs and tutoring programs available to low income families in which many public housing residents participate. In 2020, we welcomed a new public service subrecipient in Central Illinois Friends of People with AIDS. The program provides additional STI testing and treatment to residents in the community. A mobile food pantry program is proving fresh produce to WIC participants, many of whom are public housing residents.

In the above ways, the City, alongside its many partners, seeks to reduce homelessness and provide services to nonhomeless special populations. It does so through sound property management enforcement, housing rehabilitation for individuals with low-incomes or individuals with disabilities and a well-connected, cross-sector network of providers. The City is committed to these sorts of activities and networks, which are necessary in navigating the complexities of homelessness and other issues that can contribute to various levels of housing vulnerability across various sectors of the population. The City funds, supports and increases the capacity of rapid rehousing program providers and emergency shelter operations, while participating in strategic planning to enhance the implementation of these services. The City will continue these activities, policies and practices through 2021.

AP-75 Barriers to affordable housing – 91.220(j)

Introduction:

There are multiple barriers that can be challenging for the development of affordable housing. The Community Development Department keeps a close watch on its functions and fees to ensure local policy does not act as a barrier to affordable housing development. See below for specific examples of actions.

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

The City sees a healthy balance of large multifamily development as well as smaller scale, typically homeowner, affordable housing development. Fines and fees can be a barrier to development, particularly for smaller developers. The City plans to waive all permitting and associated development fees on a case-by-case basis for smaller developments. The City has done this with previous developments by local CHDO's, PCCEO, and Habitat for Humanity. In turn, this allows limited funds to more directly serve families with low incomes, rather than paying down fees. In addition, the City does not charge any fees for environmental reviews or monitoring, instead absorbing the cost in order to support the financial capacity of affordable housing developers. Regarding land use, Peoria City Council approved a special use for a 2017 HOME and CDBG-funded Pierson Hills, a multifamily affordable housing project. This special use was approved both by the City's Planning and Zoning Commission and by City Council. Community Development staff are aware that land use issues can cause barriers to affordable housing.

Discussion:

Additional information regarding the City's planned activities to foster and maintain affordable housing can be found in section AP-85: Other Actions.

AP-85 Other Actions – 91.220(k)

Introduction:

The City's planned actions in this section promote the coordination of services among providers, seek and support the pursuit of additional funding to address underserved needs and reduce the number of households in poverty through various services.

Actions planned to address obstacles to meeting underserved needs

Obstacles include insufficient funding to meet a variety of community needs, available land throughout the City for in-fill, new construction and a need for enhanced coordination of services. To resolve these issues, the City will continue to investigate new funding opportunities and engage the public and other community stakeholders to identify and prioritize needs. Through this public engagement, the City will also assist in identifying if a service is being offered by another community organization and how best to collaborate among agencies. The City will continue to obtain property through the abandoned property process associated with the demolition court. A court order deed, accompanying the demo order, is issued to the City when a property is declared by the courts as abandoned. The City will work with developers to identify a plan to best use the acquired property.

The Community Development Department will undertake neighborhood planning efforts in order to achieve better engagement from residents around desired goals and outcomes of investment. This will allow the Department to strategically allocate grant investment, according to community need.

The City employs a Neighborhood Enhancement Coordinator, who serves as a liaison between the City and neighborhood residents. This employee works to improve neighborhood conditions through management of neighborhood activities, assessing quality and efficiency of current Community Development programs and providing customer service to neighborhood residents. The Neighborhood Enhancement Coordinator, along with the City's 311 system called Peoria Cares, works to provide residents with a direct connection to the City, ensuring that the needs of residents are met.

Actions planned to foster and maintain affordable housing

The City's housing rehabilitation programs serve to maintain and foster affordable housing. Details of the housing rehabilitation programs can be found in the Plan under section AP-20: Annual Goals as well as section AP-35: Projects Summary Information.

Multi-family rental developments that have been funded with the City's HOME allocation are monitored annually to ensure that the developments are following ongoing affordability requirements and are maintained. The summary of each year's monitoring results is reported in the City's Consolidated Annual Performance Evaluation Report (CAPER).

The City will also support the following actions in 2021 to foster and maintain affordable housing:

- Allocate funding to Community Housing Development Organizations to develop affordable housing
- Allocate CDBG funding to code enforcement activities and staffing costs for increased inspections/enforcement in order to preserve existing housing and prevent situations of homelessness from occurring
- Allocate CDBG and HOME funding to a competitive housing development program
- Allocate ESG funding to provide housing assistance for homeless individuals and families
- Continue the partnership with Peoria Housing Authority
- Continue the partnership with the Heart of Illinois Homeless Continuum of Care
- Continue the sponsorship of annual Landlord Training as a part of the City's Rental Registration Program (ordinance requirement)
- Partner with IHDA to promote down payment assistance programs available in Peoria area through certified IHDA lenders
- Continue collaboration with the Peoria City/County Health Department on incorporating health in all polices

Through these actions, the City will continue to strengthen community interest and support affordable housing development.

Actions planned to reduce lead-based paint hazards

Lead based paint hazards and child lead poisoning have been well-documented in the City of Peoria. Since 2015, the City has partnered with the Peoria City/County Department of Health (PCCHD) to provide matching funds for the most recent PCCHD lead abatement/removal grant for a total of \$350,000 over three years. Through this partnership, the City is also implementing a program to expand repairs on houses selected for lead abatement by the Health Department to include other needed rehabilitation not allowed under the grant. Through the use of CDBG funds, the City hopes to leverage even more funding to increase the impact of removing lead and providing additional rehabilitation to ensure quality housing for children in the City of Peoria.

In addition, the Health Department and the City have created a process for health department staff to refer cases to the City for landlords that refuse to complete required lead abatement in rental properties. The cases go through the City's housing court process in order to enforce the code for lead paint in housing. This partnership will help to improve the quality of housing stock in Peoria and reduce lead-based paint hazards.

Actions planned to reduce the number of poverty-level families

Many of the City's programs find ways to reduce the high cost burden on poverty-level families. The City understands this function as an attempt to make progress toward reducing the number of families living in poverty and takes a multi-faceted approach in its work. Direct rehabilitation services, whether through roof or emergency repair, minimize the high cost of necessary housing repairs, which allows

poverty-level families to save money and move toward financial sufficiency regarding other necessary expenses. The City will continue both of these programs in 2021. New construction and rehabilitation of affordable homes and rentals are other facets of this approach. Activities that allow a low-income individual or family to purchase a home with a low-cost mortgage provide a clear way of establishing a line out of poverty and building equity. Rental activities for developments with subsidized units provide relief from the high and rising costs of rent by reducing rent costs to 30% of residents' income, which encourages stability and allows renters to save or put money toward other expenses. The City will fund both homeowner and rental developments in 2021. The City's rapid rehousing program stabilizes families and individuals experiencing homelessness, who are typically also experiencing the correlate of deep poverty and minimal income. Establishing this housing stability and providing the opportunity for case management toward gains in income, health services and other benefits sets a foundation for progress out of poverty. The City will fund rapid rehousing in 2021. CDBG-funded public service activities provide a variety of services and programs that directly assist low-income persons and households from slipping into poverty and/or help them move out of poverty. For example, after-school programs provide youth with a safe space to receive homework assistance and engage in learning opportunities, during hours in which their parents or guardians may still be at work and unable to provide care for them. This effort provides direct benefit to youth and guardian alike, by way of furthering educational outcomes and reducing childcare costs. Although emergency shelters do not necessarily provide a direct path out of poverty, the shelters do provide an interstice in the deep poverty that street-level homelessness can be, and often is. In turn, these shelters may act as the connecting link between homeless individuals/families and the services or support system that could provide incremental or major development toward a life outside of poverty. The City will fund emergency shelters in 2021.

Actions planned to develop institutional structure

The City has an extensive institutional structure in place for the implementation of the Annual Action Plan. The Grants Management Division of the Community Development Department is charged with the responsibility of managing all HUD funds received by the City and taking the lead role in coordinating activities with outside agencies. In 2021, the Grants Management Division will continue to participate in collaborative groups such as the Behavioral Health Workgroup, the Reproductive Health Workgroup and Invest Health in order to build community relationships and create new methods of collaboration and possible leverage of HUD funds to make a larger impact in the community. Through the sharing of resources and information, the City can continue to develop institutional communication mechanisms to better serve its residents. In addition, the Grants Division has increased participation in community groups to understand other services available to residents and more effectively market the City's current programs.

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

In 2016, City staff participated in the creation of a regional Community Health Improvement Plan, the

first regional plan in Illinois. As a member of the steering committee, staff guided and participated in the Mobilizing for Action through Planning and Partnerships (MAPP) process to select priority areas. Once the areas were selected, goals and strategies were developed. City Staff will continue a role in the steering committees to help reduce health disparities in the community in 2021.

In addition, the City is a co-lead with the Peoria City/County Health Department in a Collective Impact Initiative focused on Maternal Child Health, which brings organizations across the City together to define an agenda and work toward co-created solutions with shared measurement tools. In 2016, a group of nontraditional stakeholders such as the Library, Children's Museum and housing providers decided to address the issue of preterm birth in the community. In 2017, community partners began a program called Centering Pregnancy at the Federally Qualified Health Center in Peoria. This evidence-based program has a demonstrated history of reducing racial disparities in birth outcomes and leading to better health for both mothers and newborns. This work continued in 2020 with expansion to a second location and to implement additional strategies, which may include housing and other environmental solutions, with the ultimate goal of decreasing preterm birth disparities, especially among African American women in low-income areas of the City.

Discussion:

No additional discussion.

Program Specific Requirements

AP-90 Program Specific Requirements – 91.220(I)(1,2,4)

Introduction:

The below information documents the City's compliance with specific program requirements of its CDBG, HOME and ESG grants in program year 2020.

The City must select a consecutive period of one, two or three years that will be used to determine that a minimum overall benefit of 70% of CDBG funds were used to directly benefit low income households. The City has selected a three-year benefit period, which currently includes program years 2020, 2021 and 2022. The 2021 Annual Action Plan covers the second year of this three-year period.

The CDBG program has no program income available at the start of the 2021 program year. The City's HOME program will utilize both resale and recapture provisions further described below. The City hereby declares that it may utilize CDBG entitlement funds for urgent needs activities if an eligible emergency occurs and the City Council approves such use of CDBG funds.

Community Development Block Grant Program (CDBG) Reference 24 CFR 91.220(I)(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	0
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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 91.220(I)(2)

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

There are no other forms of investment being used. HOME Investment Partnership funds will be used as a grant to its Community Housing Development Organizations (CHDO) and a forgivable loan or grant to its Focused Area Housing Program recipients.

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

The City has adopted a Resale/Recapture Policy based on the guidance found at 24 CFR 92.254. Please refer to attachment. Also, refer to question number #3 listed below for additional narrative.

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

The City has adopted a Resale/Recapture Policy based on the guidance found at 24 CFR 92.254. For HOME funded homebuyer activities, in order to secure the required HOME Affordability Period, the Homebuyer and City will execute a written agreement that includes all the terms and conditions of the HOME assistance. Additionally, a Notice of Use Restriction (Deed Restriction) will be recorded against the property to further secure the HOME Affordability Period and requirements contained within the written agreement. The City will continue monitoring of the HOME Affordability Period by annual certification of residence and ownership mailed to the property address. The letter will contain a certification of compliance with the HOME Affordability Period detailed in the written agreement and Notice of Use Restriction (Deed Restriction) with a "Do Not Forward" label on the mailing address envelope. The City will select a random sample of previous activities within an active HOME Affordability Period to conduct further monitoring compliance. Within the sample, City staff will investigate property tax information, utility billing information and field inspections to determine residency and ownership compliance. For additional information regarding the resale

and recapture guidelines, please refer to attachment labeled HOME Resale and Recapture Policy.

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:

There are no plans to use HOME funds to refinance any existing debt.

Emergency Solutions Grant (ESG) Reference 91.220(l)(4)

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

In conjunction with the City and the Heart of Illinois Homeless Continuum of Care (HOIHCOC), the development of ESG written standards were created to provide an agreed-upon procedural guideline for program implementation in the City and through HOIHCOC member agencies. The written standards should not be seen as an alternative to or replacement of HUD rules and guidance. Instead, the standards provide a framework through which ESG funds will be used in the City. Specifically, ESG providers agree to follow procedures for screening, assessment, application and service provision to make certain that households meet the eligibility criteria of the program, to eliminate duplication and appropriate services are being provided. All ESG providers must enter client and service level data into the HOIHCOC Homeless Management Information System (HMIS) in accordance with HUD rules, operating standards set by the HOIHCOC and confidentiality laws. ESG written standards for providing assistance are included with the 2021 Annual Action Plan. Please refer to attachment. In addition to the above standards, the City in conjunction with the HOIHCOC developed a Rapid Rehousing-specific policy covering both CoC-funded and ESG-funded RRH programs within the CoC. These are attached.

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 CoC's Coordinated Entry System went live in 2017. Provisions in the Continuum of Care (CoC) Program interim rule at 24 CFR 578.7(a)(8) require that CoC's establish and operate a Centralized or Coordinated Entry System, that provides an initial, comprehensive assessment of the needs of individuals and families for housing services. HUD's primary goals for coordinated entry processes are that assistance be allocated as effectively as possible and that it be easily accessible no matter where or how people present. Our coordinated entry service provision model covering Peoria, Tazewell, Woodford and Fulton Counties (CoC service area) is designed to fulfill three primary purposes: To consolidate and streamline the community wide process by which individuals experiencing homelessness can request assistance in regaining permanent housing; To create a system that identifies a pathway to permanent housing for ALL individuals experiencing

homelessness, including creating one where it does not yet exist; and To ensure that, whenever a program has insufficient capacity to serve all consumers in their potential service population, the most vulnerable individuals experiencing homelessness are served first. A system overview and workflow are attached. The CoC has CE policies and procedures consistent with HUD requirements and a task group dedicated to administrative monitoring of the system that regularly reports to the CoC board and general membership.

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).

ESG regulations require the City to collaborate with the HOIHCOC to conduct needs assessment, develop policies and procedures for service delivery and discuss funding allocation in order to provide the most comprehensive system for the homeless and at-risk population. The City recognizes that its ESG program is closely linked to the HOIHCOC. Therefore, to better align the consultation related to ESG funding allocations, the City Council approved the reassignment of funding recommendations to the HOIHCOC from the CDBG Public Service Commission (formerly known as the Advisory Commission on Human Resources) – a standing City Commission. Historically, the CDBG PS Commissioners would review, rank and make funding recommendations to the City Council for approval. Beginning in 2014, this process is now the responsibility of the HOIHCOC. To facilitate the funding recommendation process, the HOIHCOC assembles all ESG applications and submits them to the City directly, with a cover letter outlining the CoC’s funding allocation recommendation to the City Council. The HOIHCOC Governing Board works with its member agencies to identify service priorities, program performance measures, provider capabilities to comply with ESG regulations and opportunities to leverage other funding. ESG subrecipients are awarded grants for a two-year term. This extended grant term allows for a partnership between the awarded service provider, the City and the HOIHCOC to shift the focus from an application/funding cycle to program performance. This process is collaborative and requires communication between service providers on how to best allocate funds for the most needed services.

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 HOIHCOC Governing Board meets the homeless participation requirements in 24 CFR 576.405 (a) by holding a Board Member position for a current or formerly homeless individual.

5. Describe performance standards for evaluating ESG.

In support of a robust, community wide effort to end homelessness the City has adapted its performance standards to more closely align with that goal. Rather than allowing program participants define their own performance measures as has been done in the past, the City has

unified performance measurement across providers. Previously, most subrecipients reported primarily on persons served. Beginning in 2019, the City has required that providers set and meet goals for how many clients they will connect to permanent housing (measured by exits to permanent housing). This goal is set both for emergency shelter programs and rapid re-housing programs. It re-emphasizes that the goal is to end homelessness and ensures that providers are orienting their existing resources and energies around this goal.

Performance is tracked quarterly. Subrecipients are sent reports on the status of their grant drawdown/remaining funds and their goal performance to date.

No additional discussion.



Official Certificate of Publication as Required by State Law and IPA By-Laws

Certificate of the Publisher

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

A notice, a true copy of which is attached, was published 1 time in Peoria Journal Star. The publication of the notice was made in the newspaper, dated and published on March 2nd, 2021. The notice was also placed on a statewide public notice website as required by 715 ILCS 5/2.1.

In witness, the Peoria Journal Star has signed this certificate by Gannett, its publisher, at Peoria, Illinois, on March 11th, 2021.

City of Peoria
Ad # 4720329

By:

Ashley Anderson
Legal Notice Representative
Gannett
Publisher

(Note: Unless otherwise ordered, notarization of this document is **not** required.)

NOTICE OF PUBLIC HEARINGS AND PUBLIC COMMENT PERIOD**City of Peoria, Illinois
2021 Annual Action Plan**

NOTICE IS HEREBY GIVEN that the City of Peoria will hold two virtual public hearings, on Wednesday, March 10th, 2021 at 5:30 PM and on Tuesday, March 16th, 2021 at 10:00 AM:

The first virtual public hearing will be held on Wednesday, March 10th at 5:30 PM and can be accessed the following ways:

- Phone: (877) 309-2073 (toll free) or (571) 317-3129; Access Code: 441-706-469
- Internet: <https://global.gotomeeting.com/join/441706469>

The second virtual public hearing will be held on Tuesday, March 16th at 10:00 AM and can be accessed the following ways:

- Phone: (877) 309-2073 (toll free) or (571) 317-3129; Access Code: 238-520-909
- Internet: <https://global.gotomeeting.com/join/238520909>

The purpose of these hearings is to obtain views and opinions from the public on the draft 2021 Annual Action Plan. The Annual Action Plan provides a concise summary of the activities that will be conducted with 2021 grant funding through the Community Development Block Grant (CDBG) program, the HOME Investment Partnerships program, and Emergency Solutions Grant (ESG).

A 30 day public comment period must be held for comment on the Annual Action Plan. This comment period is from Wednesday, March 3rd to Saturday, April 3rd at 5:00 PM. A copy of the draft Annual Action Plan will be available at the City of Peoria Community Development Department, City Hall Room 203, from 8:00 AM to 12:00 PM.

A copy is also available on the City of Peoria website at <http://www.peoriagov.org/community-development/neighborhood-development-division/> under "Publications".

Written comments should be sent to the Community Development Department, Attn: Kathryn Murphy, at 419 Fulton Street, Room 307, Peoria, IL 61602 or via email to kmurphy@peoriagov.org.

The virtual public hearings are open to the public, and residents are encouraged to attend. Please call (309) 494-8607 if you need an interpreter or any additional accommodations to participate in the virtual public hearings. The Annual Action Plan is subject to amendment or approval by the City Council.

A summary of the comments, including comments not accepted and the reasons for such, will be included in the plan submitted to HUD. For questions regarding this Notice, please contact Kathryn Murphy at (309) 494-8607 or via e-mail at kmurphy@peoriagov.org.

: OFFICIAL PROCEEDINGS :
: OF THE CITY OF PEORIA, ILLINOIS:

A public hearing to discuss the content of the City of Peoria 2021 Annual Action Plan was held on Wednesday, March 10, 2021 at 5:30 p.m., via Remote Video Conference, with Grants Manager Kathryn Murphy presiding and with proper notice having been posted.

CITY STAFF

Present: Kathryn Murphy, Bahader Singh

PRESENTATION

Kathryn Murphy, Grants Manager, City of Peoria Community Development Department, provided an overview of the 2021 Annual Action Plan and its purpose. She also stated that this was the first public hearing of two that was being held as an opportunity for citizens in the community to provide input and feedback on the plan, as well as to address questions to City Staff.

CITIZENS' COMMENTS

Pam Perrilles, Executive Director at CASA of the Tenth Judicial Circuit, stated that her organization has not applied for Community Development Block Grant (CDBG) funding in recent times and that her organization's funding had been cut. She asked if her organization could apply for funds, as well as the priorities the City makes in selecting organizations for funding. Ms. Murphy stated that CDBG funding for public service activities is still an available program and that the 2021 period is now closed. She also stated the next application should open in summer or fall of 2021 for funding in 2022, as well as the process for selecting organizations. Ms. Murphy stated she could provide information about the City's priorities to Ms. Perrilles via email.


Ms. Perrilles asked the average grant size received by public service organizations. Ms. Murphy stated she did not have that information readily available but that she would communicate that via email, as well. Ms. Murphy also stated the minimum request for public service grants is \$15,000, with the maximum request for 2021 being set at \$30,000.

Ms. Perrilles asked about funding made available due to the COVID-19 pandemic. Ms. Murphy stated that the City of Peoria had received a round of CDBG funding to address the impact of the COVID-19 pandemic (CDBG-CV) and its related expenses in 2020 and that funds had been expended as of December 2020. Ms. Perrilles asked if CDBG-CV funds would be made available again. Ms. Murphy stated that she was uncertain, as the City has another round of such funding available, but that the use of the funds is pending City Council action.

There being no further citizens' comments, the public hearing was closed at 5:49 PM.

ADJOURNMENT

The public hearing was closed at 5:49 PM.



Bahader Singh, Junior Grants Coordinator

: OFFICIAL PROCEEDINGS :

: OF THE CITY OF PEORIA, ILLINOIS:

A public hearing to discuss the content of the City of Peoria 2021 Annual Action Plan was held on Tuesday, March 16, 2021 at 10:00 a.m., via Remote Video Conference, with Grants Manager Kathryn Murphy presiding and with proper notice having been posted.

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Present: Kathryn Murphy, Bahader Singh

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Kathryn Murphy, Grants Manager, City of Peoria Community Development Department, provided an overview of the 2021 Annual Action Plan and its purpose. She also stated that this was the second public hearing of two that was being held as an opportunity for citizens in the community to provide input and feedback on the plan, as well as to address questions to City Staff.

CITIZENS' COMMENTS

Present citizens included: Lee Anne Schmidgall, Executive Director at Habitat for Humanity Greater Peoria Area; Marissa Bainter, Family Services Coordinator at Habitat for Humanity Greater Peoria Area; Denise Conklin, Managing Attorney at Prairie State Legal Services Peoria Office; and Rilla Adcock, Administrative Manager at Prairie State Legal Services Peoria Office.

There being no comments, the comments session was closed at 10:06 a.m.

ADJOURNMENT

The public hearing was closed at 10:06 a.m.



Bahader Singh, Junior Grants Coordinator

Annual HOME Funding Cycle

Pursuant to HUD regulations regarding the Citizen Participation Process, an annual public hearing regarding needs in the community is publicly noticed and usually held prior to the creation of the Annual Action Plan in the fall. The Consolidated Plan, Annual Action Plan, and CAPER can all be found on the Community Development Department's Grants Management website.

Eligible applicants for HOME funds are for-profit and non-profit affordable housing developers with documented experience, capacity, and financial resources to complete projects in a timely manner and in compliance with all applicable regulations. Grants Management staff oversees the application, construction, and compliance process for HOME funds. HOME funds are awarded to affordable housing activities on a project by project basis. Final approval for all projects is determined by the City Council. Developers interested in receiving information about the HOME program can call 309-494-8600 or grants@peoriagov.org.

Project proposals for HOME funds are accepted at any time during the year on a first come first served basis. These project proposals are reviewed internally based on funding availability. If selected to move forward, a full application will be provided to the applicant and the whole project will be evaluated by staff. Funding is not guaranteed until approved by the City Council.

The City may also release specific Notice of Funding Availability (NOFA) for certain programs contained in the Annual Action Plan such as the Competitive Grant Program. These NOFAs are available on the City of Peoria website on the Community Development Department's Grants Management page as well as the purchasing department's website.

CHDO funds are made available through a Notice of Funding Availability that includes a certification process to ensure the organization meets the CHDO requirements as outlined at 24 CFR § 92.2 and 24 CFR 92 subpart G. These NOFAs are available on the City of Peoria website on the Community Development Department's Grants Management page.

Any questions regarding the process for HOME funding can be addressed by calling 309-494-8600 or emailing grants@peoriagov.org.

**City of Peoria
Resale and Recapture Guidelines for
HOME Program Activities**

The City of Peoria Grants Management Division of the Community Development Department will use HOME Investment Partnerships Program funds to provide housing for low-income persons. The forms of funding used to assist homebuyers and/or developers include: down payment assistance, development subsidies, or some combination of these methods. The City of Peoria Grants Management Division will use the Recapture method of insuring affordability for all homebuyer activities in which direct HOME funds assistance is provided. The City of Peoria Grants Management Division will use the Resale provision of insuring affordability when direct HOME funds assistance is not provided. Only one method shall be utilized for each project, the Recapture method is only allowed when there is direct HOME funds assistance provided.

Recapture Provisions

Subject to recapture are the HOME funds that are invested in a HOME assisted unit, as a direct subsidy to the homebuyer. The subsidy could include down payment assistance and the amount of each subsidy would be a minimum of \$1,000 and differ per each homebuyer. The minimum length of affordability is based on the total direct HOME funds assistance provided:

Affordability Requirements for the HOME Program

Total direct HOME subsidy to the buyer, per unit	Minimum period of Affordability
Less than \$15,000	5 Years
\$15,000 to \$40,000	10 Years
More than \$40,000	15 Years

The period of affordability shall commence from the date the activity is identified as “completed” in HUD’s Integrated Disbursement Information System (IDIS).

The Recapture Provisions are as follows:

- The Affordability Period shall be based on the total direct HOME subsidy to the homebuyer and does not take into account a development subsidy provided on the unit.
- The buyer must be purchasing the home to use as a principal residence. In other words, the buyer must intend to live in the home for the entire affordability period and not be buying the home for any other purpose, such as investment or rental property.
- Enforcement Mechanisms – Recapture provisions shall be detailed within each program written agreement between the homebuyer and the City of Peoria and enforced through a Notice of Use Restriction filed with the Peoria County Recorder’s Office.
- The requirements within shall be triggered upon sale or transfer of the HOME assisted property. As listed below:
 - In the event of a sale, conveyance or other transfer of the property, excluding any one or more of the following (each, a “Permitted Transfer”): any sale, conveyance or transfer

(A) to a spouse upon a dissolution of marriage, (B) to the surviving spouse upon the death of a joint tenant Owner, (C) by will, or (D) upon foreclosure or deed in lieu of foreclosure, provided however that there are no Net Proceeds from the foreclosure or deed in lieu of foreclosure or that the City has received all or a portion of the funds from the Net Proceeds from the foreclosure or deed in lieu of foreclosure, then the City shall receive a portion of the funds from the Net Proceeds.

- The City will reduce the HOME investment amount to be recaptured from the Net Proceeds on a prorated basis for the time the Homeowner has owned and occupied the housing measured against the remaining years in the required Affordability Period. The prorated basis is as follows:
 - First Year - 90% of HOME investment from available Net Proceeds
 - Second Year - 70% of HOME investment from available Net Proceeds
 - Third Year - 50% of HOME investment from available Net Proceeds
 - Fourth Year - 30% of HOME investment from available Net Proceeds
 - Fifth Year - 10% of HOME investment from available Net Proceeds
- The amount of recapture funds are subject to the availability of Net Proceeds available from the resale of the property. The term “Net Proceeds” shall mean the proceeds as indicated upon a closing settlement statement of the net amount to be paid to the seller. In the event that no such statement exists, “Net Proceeds” shall mean the amount equal to the sales price (X) minus any superior private debt (Y) and minus any reasonable closing costs (Z), as determined by the City, including, but not limited to, title insurance, recording fees, Realtor’s commissions or property taxes.
- Additionally, the assisted Homebuyer will agree within the Affordability Period, to not vacate and then lease the property. In the event that the Homebuyer should vacate and then lease the property within the Affordability Period, the Homebuyer agrees, upon written demand from the City sent to the Homebuyer’s last known address, to re-occupy the property within a reasonable time as determined by the City and remain in the property until the expiration of the Affordability Period. If re-occupancy does not occur the Homebuyer agrees to repay the total amount of the HOME subsidy assistance to the City. The repayment shall become due and payable upon the City’s demand.

Resale Provisions

Subject to Resale Provisions are the total HOME funds that are invested in a HOME-assisted unit in which no direct subsidy assistance is provided. The minimum length of affordability is based on the total HOME funds assistance provided:

Affordability Requirements for the HOME Program	
Total HOME Subsidy per unit	Minimum period of Affordability
Under \$15,000	5 Years
\$15,000 to \$40,000	10 Years
Over \$40,000	15 Years

The period of affordability shall commence from the date the activity is identified as “completed” in HUD’s Integrated Disbursement Information System (IDIS).

The Resale Provisions are as follows:

- The Affordability Period is based on the total amount of HOME funds invested in a property.
- The buyer must be purchasing the home to use as a principal residence. In other words, the buyer must intend to live in the home for the entire affordability period and not be buying the home for any other purpose, such as investment or rental property.
- Enforcement Mechanisms – Recapture provisions shall be detailed within each program written agreement between the homebuyer and the City of Peoria and enforced through a Notice of Use Restriction filed with the Peoria County Recorder’s Office.
- Methods – The Resale option ensures that the HOME assisted unit remains affordable over the entire period of affordability. Resale Provisions must be used where there is no direct HOME funds assistance provided.
- The requirements within shall be triggered upon sale or transfer of the HOME assisted property. As listed below:
 - Within the Affordability Period, the Owner agrees to only sell, convey or otherwise transfer the property to a low-income buyer for a sales price that is affordable and provides a fair return on owner investment, excluding any one or more of the following (each, a “Permitted Transfer”): any sale, conveyance or transfer (A) to a spouse upon a dissolution of marriage, (B) to the surviving spouse upon the death of a joint tenant Owner, (C) by will to a low-income buyer, or (D) upon foreclosure or deed in lieu of foreclosure, provided however the Affordability Period has not expired and any resale of the property is to a low-income buyer who will occupy the property for the remainder of the Affordability Period.
- The term “low-income buyer” has an annual income, as adjusted for family size, that is less than or equal to eighty percent (80%) of the area median income (as defined by HUD) for the Peoria County area.
- The sales price must be “affordable” to low-income buyers. In this instance, the affordable price results in a monthly housing cost for principal, interest, taxes and insurance of not more than 30% of the gross monthly income for a household below 80% of the area median income for the Peoria County Area.
- Net proceeds from the sale must provide the original homebuyer, now the home seller, a “fair return” on his/her investment (including any down payment and capital improvement investment made by the seller since purchase). The sales price may encompass the following in its formula:
 - The cost of any capital improvements, documented with receipts including but not limited to the following:
 - Any additions to the home such as a bedroom, bathroom, or garage;
 - Replacement of heating, ventilation, and air conditioning systems;
 - Accessibility improvements such as bathroom modifications for disabled or elderly which were not installed through a federal, state, or locally-funded grant program; and

- Outdoor improvements such as a new driveway, walkway, retaining wall, or fence.
 - The increase in the value of owner equity and investment as calculated by the cumulative percentage of change which is calculated by the Housing Price Index (HPI) calculator of the Federal Housing Finance Agency (X) plus 1.00 times the total owner investment at time of purchase (Y) plus the documented improvements as described above (Z).
 - (Example - Home purchased in 2000 for \$50,000. The HPI for 2000-2004 stayed the same at +.03 for each year, which calculates to a cumulative percentage of .12. To calculate "fair return" one must multiply $\$50,000 \times 1.12 = \$56,000$, plus the documented improvements of \$4,000 would total \$60,000. The "fair return" to the seller would be the increase in value of \$60,000, minus the original investment of \$50,000 to equal a \$10,000 fair return.)
- Additionally, the assisted Homebuyer will agree within the Affordability Period, to not vacate and then lease the property. In the event that the Homebuyer should vacate and then lease the property within the Affordability Period, the Homebuyer agrees, upon written demand from the City sent to the Homebuyer's last known address, to re-occupy the property within a reasonable time as determined by the City and remain in the property until the expiration of the Affordability Period. If re-occupancy does not occur the Homebuyer agrees to repay the total amount of the HOME subsidy assistance to the City. The repayment shall become due and payable upon the City's demand.



Emergency Solutions Grant (ESG)
Policies and Procedures

The intent of this document is to provide a framework through which ESG funds will be used in the City of Peoria. This document provides a summary of HUD ESG rules and agreed upon procedural guidelines for program implementation in the City and provided by member agencies of the Heart of Illinois Homeless Continuum of Care (HOIHCO).

This document, in no manner, should be seen as an alternative to or replacement of HUD rules and guidance. More information can be found at www.hudhre.info

I. CONSISTENT PROCEDURES AND PRACTICES:

ESG providers agree to follow procedures for screening, assessment, application and service provision to make certain that households meet the eligibility criteria of the program, to eliminate duplication, and to ensure seamless homeless prevention coverage in the county. All ESG providers must enter client and service level data into the Heart of Illinois Homeless Continuum of Care (HOIHCO) HMIS system in accordance with HUD rules, operating standards set by the HOIHCO and confidentiality laws.

The ESG Interim Rule provided four possible categories under which individuals and families may qualify as homeless, corresponding to the broad categories established by the statutory language of the definition in section 103 of the McKinney-Vento Act, as amended by the HEARTH Act.

Projects must serve clients that qualify as Homeless (HUD definition at 24 CFR Part 91 or At-Risk of Homelessness (HUD definition at 24 CFR Part 576). The categories are:

- (1) Literally Homeless;
- (2) Imminent Risk of Homelessness;
- (3) Homeless under other Federal statutes; and
- (4) Individuals and families who are fleeing, or are attempting to flee domestic violence.

II. COORDINATION OF SERVICES:

ESG Providers will work with member agencies of the HOIHCO to utilize a universal brief screening tool to be used to identify consumers who are appropriate to access funds and supportive services through ESG.

Other available resources will be used before ESG funds are used in homeless prevention. In addition, the ESG providers will collaborate with other agencies to ensure that all households at risk will have full access to homeless prevention and intervention resources, including area shelters, transitional housing programs, townships and other human service entities.

Eligible applicants must live within the City of Peoria, meet income guidelines, and be homeless but for the ESG assistance.

III. PREVENTION OF HOMELESSNESS THROUGH THE ESG PROGRAM:

Prevention assistance to households under the ESG Program is intended to have a meaningful impact on homelessness and housing stability for participating households.

ESG provides a variety of supports (*See Eligible Supports*) to achieve the following three assistive elements: preventing people from homelessness; diverting people who are applying for shelter into other housing; and helping people who become homeless to quickly return to permanent housing. ESG consists of a Rapid Re-housing component for those who are currently homeless and a Homeless Prevention component for those at risk of becoming homeless. Eligible households include people with very low incomes (below 30% of the Area Median Income AMI), who lack resources for housing and who are homeless or would be homeless *but for this assistance*.

Participating households must agree to allow household demographic and service information to be shared through the HOIHCOC Homeless Management Information System (HMIS), (*See Confidentiality & HMIS Standards*), must complete a case management assessment and must develop and participate in case management and life skills support from a provider agency.

The HOIHCOC will target households that have a demonstrated housing crisis, that meet one or more risk factor and that are likely to remain stably housed after this assistance.

Eligibility may be re-assessed every 30 days for all participating households (*See Eligibility Criteria & Risk Factors*). Households receiving any type of rent assistance under this program must reside or plan to reside in an eligible unit (*See Eligible Units*). ESG is not a mortgage assistance program and it is not intended to serve persons who need long-term and or intensive supports.

Maximum forward assistance under this program is 3 months and may be extended with approval of the supervisor.

IV. ELIGIBLE SUPPORT FOR HOMELESS PREVENTION & RAPID RE-HOUSING

Supports provided by provider agencies are intentionally focused on housing – either financial assistance to help pay for housing, or services designed to keep people in housing or to find housing. ESG provider agencies should be prepared to develop a clear process for determining the type, duration and level of assistance available for each participating household.

Financial Assistance

- Rent arrearage (up to 6 months)**
- Short-term rent assistance (up to 3 months)**
- Security Deposits (max 2 months rent)
- Utility Deposits
- Utility Arrearages (up to 6 months)

Housing Relocation and Stabilization Services

- Case Management
- Housing Search and Placement

* The HOIHCOC ESG providers have agreed to limit short-term rent assistance to a maximum of 3 months.

V. PROCEDURAL GUIDELINES FOR ESG ASSISTANCE

- The HOIHCOC ESG provider agencies will only provide assistance to households residing in, homeless within or moving to Peoria, Tazewell, Woodford, and Fulton Counties.
- ESG assistance cannot be provided to eligible individuals or families for the same period of time and for the same cost types that are being provided through another federal, state, or local housing subsidy program.
- There are four cost types: rent payments (client portion or the subsidy), security deposits, utility deposits, and utility payments. So, if a participant is receiving rental assistance under another program, ESG funds may not be used for rental assistance during that same time period.
- Funding could be used to pay for another cost type such as security deposit or utility payments. For example, a homeless veteran entering a HUD-VASH project may receive security deposit assistance through ESG funds.
- For households who have the Section 8 Housing Choice Voucher, assistance should be provided through existing HPP funds such as IDHS before utilizing ESG funds, document rent amount and that the unit has passed inspection before any assistance is approved.
- When providing rental assistance and security deposit, the lease must be in the client's name and signed by the tenant and the landlord. The assistance (voucher and payment) is made to the property owner/property complex only, and is not to exceed the amount owed to the owner for rent and/or security deposit.
- Security Deposits are to be used for permanent housing only. Clients that are moving into a halfway house or need "program fees" are not eligible.
- ESG agencies will only provide the equivalent of 2 months' rent maximum for security deposit to eligible households. Exceptions will only be made for good cause, such as proven bad credit, which prevents the household and the ESG agency from locating an appropriate alternative unit.
- When providing rental arrearage assistance the ESG agency must ensure and document that the payment will enable the eligible household to remain in the housing unit for which the arrears are being paid or enable the household to move to another unit.

- ESG agencies will only provide eligible individuals or households with up to 6 months of arrears, provided that the client or a member of his/her household has an account in his/her name with a utility company. ESG funds can only be utilized for provision of gas, electric, water, and sewer services, not phone or cable.
- Financial assistance is provided in voucher form only and no payments are made directly to participating households.
- ESG providers must track ESG services separately from other funds. Likewise, services provided under the components of Homeless Prevention and Rapid Re-housing must be tracked independent of each other. Finally, ESG funds provided via the State of Illinois must be tracked separately from ESG funds provided by the City of Peoria.

VI. ELIGIBILITY CRITERIA

All households must be reassessed for eligibility on a quarterly basis. Households which do not meet all eligibility criteria are not eligible to receive any ESG services - including financial assistance and housing relocation and stabilization services. Households may become ineligible for ESG services if they do not meet the terms of the Recovery Plan at any point as determined by the ESG provider. (*See Separation Guidelines*)

HUD Guidelines:

- Household must be at or below 30% of the HUD Area Median Income (AMI) guidelines (*see www.huduser.org/DATASETS/il.html*);
- Must have no subsequent housing options identified but for this assistance;
- Must lack financial resources or support network to obtain and sustain housing but for this assistance;
- Agrees to allow household information to be shared via the HMIS reporting system, ESG funding recipients must be entered into HMIS for reporting requirements (unless exempted by law);
- Must complete a comprehensive assessment of needs matrix, a goal sheet, and the universal service plan for housing stabilization;
- ESG funding recipients must be willing to create and engage in services, goal-setting, and case management as needed to acquire and maintain stable housing (independent of this assistance within a defined time period not to exceed 12 months);
- If receiving assistance with utility deposit or utility arrearage, household must show valid disconnect notice or proof that utilities will not be connected without assistance. As with all activities under ESG, assistance must be sought first from other resources (LIHEAP);
- If receiving short term rent assistance, the household must be living in or planning to move to a residence which meets HUD's Rent Reasonableness Standard and quality housing standards. (*See Eligible Units*);

- If receiving any services through the Rapid Re-housing component of ESG, household must be homeless according to the following criteria as defined by section 103 of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11302):
- The proposed rule, submitted for public comment, provided four possible categories under which individuals and families may qualify as homeless, corresponding to the broad categories established by the statutory language of the definition in section 103 of the McKinney-Vento Act, as amended by the HEARTH Act. Projects must serve clients that qualify as Homeless (HUD definition at 24 CFR Part 91 or At-Risk of Homelessness (HUD definition at 24 CFR Part 576) The final rule maintains these four categories. The categories are:
 - (1) Individuals and families who lack a fixed, regular, and adequate nighttime residence and includes a subset for an individual who resided in an emergency shelter or a place not meant for human habitation and who is exiting an institution where he or she temporarily resided;
 - (2) individuals and families who will imminently lose their primary nighttime residence;
 - (3) unaccompanied youth and families with children and youth who are defined as homeless under other federal statutes who do not otherwise qualify as homeless under this definition; and
 - (4) individuals and families who are fleeing, or are attempting to flee, domestic violence, dating violence, sexual assault, stalking, or other dangerous or life-threatening conditions that relate to violence against the individual or a family member. Throughout this preamble, all references to a number “category of homeless’ ’refer to this list.

Process Notes:

Upon identification, eligible applicants must complete an intake and assessment process with one of the ESG provider agencies.

As part of the intake process, all applicants will complete an income eligibility review. This is discussed in more detail in a later section of the manual.

Case managers from each agency will meet on a weekly basis to review these assessments and identify those that are selected for assistance. At time of identification, the ESG agencies will also assign participants to the appropriate agency for case management/assistance based upon their specific needs.

A review of client eligibility will be completed every 30 days during participation in the program to ensure ongoing eligibility for assistance.

See the Forms section of this manual for hard copies of all forms used by the program.

VII. TARGETED HOUSEHOLDS

A. RISK FACTORS FOR HOMELESS PREVENTION AND RAPID RE-HOUSING

The HOIHCOC ESG providers will target households to serve those who are most in need of this temporary assistance and most likely to achieve stable housing outside ESG. In addition to meeting all eligibility criteria, households will meet one or more of the risk factors as outlined below and have access to or potential for obtaining resources necessary to gain family self-sufficiency. It is expected that many of the households served will be at risk of homelessness due to the economic crisis.

- The household must be able to document a drop in income, severe housing cost burden, mental or physical illness or disability or other significant life changing event that limits their ability to maintain housing but for this assistance. Examples may include:
 - Experiencing short-term economic crisis due to sudden drop in income/increase in expenses
 - unemployment/ low-income
 - Individuals who are unemployed or underemployed or whose families income is insufficient to meet their housing costs and have already lost their housing
 - Formerly dual income households where one member is unemployed so there is not enough income to meet their housing costs
 - Unemployed persons who receive unemployment benefits but the benefit is insufficient to meet their housing costs
 - Extended medical leave/disability
 - Experiencing severe housing cost burden (greater than 50% of income for housing costs)
 - Extremely low income (less than 30% of AMI)
 - Currently residing in precarious or unsuitable housing
 - Family residing in a hotel
 - Periodic residency in multiple shelters but gainfully employed
 - Unable to reside in current unit for medical or safety reasons, (for example, client has medical documentation from a doctor stating that he/she must move due to a medical condition that cannot be accommodated or which is worsened by the household's current residence).
 - Discharge within 2 weeks from an institution in which the person has been a resident for more than 180 days (including prisons, mental health institutions, and hospitals)
 - Change in family composition
 - Change in household composition which puts the household over occupancy for the unit (the number of persons exceeds health and/or safety standards)
 - Loss of the household's primary financial provider
 - Eviction/foreclosure
 - Pending foreclosure of rental housing

- Persons experiencing eviction within 2 weeks (including housing provided by family or friends if the housing is no longer an option for them)
- Unable to reside in current unit for other reasons outside the client’s control - Client’s landlord has sold the building and it is no longer an option to lease there; Landlord refused to rent to client for any reason;
- Persons with residency in housing that has been condemned or deemed uninhabitable by the appropriate authority
- Personal foreclosure, short-sale
- Victims of violent crime, domestic violence or natural disaster
- Barriers complicating housing
 - Persons experiencing mental health, physical disabilities, & substance abuse issues that are a barrier to household income and housing
 - Persons previously experiencing homelessness within the last 12 months
 - Single expectant mothers
 - Persons experiencing significant life changing event such as past institutional care, trauma, credit problems, or medical debt that limits their ability to maintain housing

B. NON-DUPLICATION

HUD Guidelines

ESG specifies a household previously deemed ineligible, but which becomes eligible may continue to receive assistance but is not to exceed a total of 3 months of assistance. Additional financial supports will be determined at the discretion of the ESG agency using geographic boundaries and criteria for *Non-selection/Non-continuation*.

C. NON-SELECTION/NON-CONTINUATION (INITIAL/CONTINUING ELIGIBILITY)

Procedural Guidelines:

The ESG agency will make decisions regarding non-selection for participation in ESG at initial application or at recertification due to any of the reasons defined below. Criteria apply to both initial application and at time of quarterly reassessment.

Please note: Violent or drug related criminal activity related to a household receiving any type of rental assistance is grounds for immediate termination. Likewise, misrepresentation of eligibility by any household also provides reason for immediate separation from any program assistance.

- Household does not meet all eligibility criteria: Or
- Household does not complete all steps to establish eligibility in a timely manner: Or
- Misuse of program services by any household member; Or
- Household does not complete or refuses to engage in Recovery Plan objectives: Or
- Household non-readiness, as determined by the ESG providing agency, due to:

- Lack of “key” services from service providers in the community or an unwillingness/inability by the household to link to such key services; And/or
- Household’s misuse of resources, including personal resources such as income and benefits

Key resources are those resources or services that are integral to the household’s ability to achieve self-sufficiency.
Self-Sufficiency is defined as the household’s ability to maintain rent and household expenses independent of the ESG within a defined period of time.

- At the discretion of the ESG providing agency, based on the household’s use of current and past agency services - Including but not limited to: a review of the client’s previous participation in similar agency services, such as homeless prevention services, short-term case management or some equivalent data.

The ESG providing agency will make all reasonable efforts to link clients to services or advocate for provision of services before making a decision of non-selection.

VIII. SEPARATION GUIDELINES

Procedural Guidelines-

All assistance provided under ESG is subject to eligibility requirements and program guidelines. Final decisions regarding non-selection/non-continuation will be relayed in writing, to the household, by the ESG providing agency. The ESG agency will provide, when appropriate, information about helpful outside resources and the opportunity to re-apply to the program or to enter the program at a later date.

A formal separation process will, at a minimum, consist of the following:

- Written notice which includes date of termination, reason for termination, opportunity for appeal, and, if appropriate, any helpful resources to assist the participating household to maintain housing stability.
- Opportunity to appeal – Participating households which are selected for non-continuation are entitled to request a review of the decision with the opportunity to present oral or written objections before a person other than the person (or a subordinate of the person) who made or approved the termination decision. Final decisions regarding the appeal will be provided in writing.

IX. ELIGIBLE UNITS

Information regarding conflicts of interest, Nondiscrimination and Equal Opportunity Requirements and Fair Housing and Civil Rights laws are in effect.

A. RENT REASONABLENESS STANDARD

Rental assistance must comply with HUD's rent reasonableness standard, meaning the total rent charged for a unit must be reasonable in relation to the rents being charged during the same time period for comparable units in the private, unassisted market and must not be in excess of rents being charged by the owner for comparable non-luxury unassisted units.

Process Guidelines:

Comparable review can also be checked by:

- Using a market study, or
- Reviewing comparable units advertised for rent
- Written verification from the property owner of comparability of rent charged with other units owned.
-

The ESG providing agency should consider the following when determining rent reasonable:

- The location, quality, age, size, and type of the unit
- Any amenities, services and utilities to be provided by the owner

Visit www.hud.gov/offices/cpd/affordablehousing/library/forms/rentreasonablechecklist.doc for more information.

B. HABITABILITY STANDARD

HUD Guidelines:

ESG agencies will be required to conduct initial and any appropriate follow-up inspections of housing units if the participating household receives security deposit or short-term or medium-term rent assistance. Additional information can be found in Appendix C of the ESG notice dated March 10, 2009.

- For households with children 6 and younger, a visual inspection for lead based paint
- For all household's moving into a unit, a full inspection of a unit and additional annual inspections if assistance exceeds 12 months.

Process Guidelines:

The CoC has determined that it will conduct both a lead-based paint visual assessment (where required based upon age of housing unit and household make-up) and a habitability review for both Prevention and Rapid Rehousing support.

When a unit is determined to be inhabitable under the HUD standards, the agency will identify the unit as ineligible for ESG support and offer assistance to the participant in finding safe, affordable housing.

See the Forms section of this manual for hard copies of all forms used by the program.

C. LEASES

Process Guidelines

The provision of ESG rent assistance and security deposits seeks to ensure permanent housing stabilization.

- The landlord must agree to work with the ESG agency to accept voucher rent payment and to stop eviction proceedings upon receipt of signed voucher.
- Households may be assisted at the end of their lease term, if a move to another housing unit is necessary in order to ensure future housing stabilization.
- Month-to-Month leases – month-to-month leases reflect transience, and should be avoided generally. The landlord needs to be engaged in working on a long term lease arrangement.
- ESG agencies must have a copy of the valid lease to assist with rent. Valid leases must include signatures of both the client and/or a member of the household and the owner, and must be dated.
 - Recipients of ESG funds must have a legal right to reside in the unit and prove responsibility for paying the rent. As a general matter, if the eligible person is not named on a valid lease/rental agreement either as a tenant or an authorized occupant, the person has no legal right to reside in the unit and is therefore not eligible for rental assistance. However, if an applicant is listed as an occupant on a lease agreement and can prove through paid receipts in their name, money orders or cancelled checks that they pay rent or utility bills, even if the accounts are in the name of another household member, it is permissible to assist the applicant. The Grantee and project sponsor have responsibility for ensuring the eligibility of each household assisted with ESG funds. The eligibility assessment would determine if the total household income would be included, or if a shared leased housing arrangement is present, therefore counting only the applicant's income. While an oral lease for less than a year may be valid in some states, most states require a written lease to establish a legal tenancy and HOPWA adopts this clear standard. This position is also consistent with other HUD rental assistance programs, which require such documentation (e.g., HOME, Shelter Plus Care, Housing Choice Vouchers/Section 8). As a practical matter, not requiring a written lease may leave grantees in a vulnerable position in documenting ESG payments during audits and reviews.
 - A sublease is considered a legal lease. However, the grantee should be sure that the relationship between the participant/grantee/sub grantee and the landlord is not in violation of the conflict of interest provisions as stated in the ESG Notice. For example, the sublease agreement should not be between relatives or other parties where there is a potential conflict of interest.

X. DETERMINING TYPE, LEVEL AND DURATION OF ASSISTANCE

HUD advises that ESG assistance should be “need-based”, meaning that providing agencies should determine the amount of assistance based on the minimum amount necessary to prevent the program participant from becoming homeless or returning to homelessness in the near future. Upon approval of supervisor and only in emergency situations can ESG assistance exceed 3 months.

RENTAL ASSISTANCE

Maximum of three months of short term rental assistance will be provided. Amount of assistance will be based on the minimum amount necessary to prevent CL from becoming or returning to homelessness.

Procedural Guidelines - To ensure a consistent application of standards in determining rent amounts to ESG participating households, ESG providers will meet on a regular basis to review compliance with ESG program requirements.

Where Rapid Rehousing assistance is indicated, maximum of three months of short term rental assistance will be provided. Amount of assistance will be based on the minimum amount necessary to prevent CL from becoming or returning to homelessness.

HUD Guideline of eligible ESG services:

Financial assistance

- a) Short-term
 - i) Includes arrearages, rent, and Security deposit
 - ii) Utility arrearages (6 months max) and deposit
 - iii) Up to 3 months of ongoing assistance provided

Housing Relocation & Stabilization

- a) Short-term
 - i) Housing search and placement
 - ii) Housing stability case management
 - iii) Mediation
 - iv) Legal services
 - v) Credit repair

XI. HMIS STANDARDS

A. HMIS STANDARDS

HMIS is locally administered by the HOIHCOC locally referred to as HMIS or Homeless Management Information Systems. HMIS was developed by HUD to gather and analyze data to determine the effectiveness of McKinney-Vento Act Programs. HMIS provides the ability to: develop unduplicated

counts of clients served at the local level; analyze patterns of use of people entering and exiting the homeless system; and evaluate the effectiveness of those systems.

ALL ESG providing agencies must enter client-level data into the HOIHCOC HMIS unless prohibited by law. Baseline requirements include: Data collection; program descriptors; universal data elements; and program specific data elements. These elements are being revised for the implementation of ESG.

All ESG providing agencies must:

- Comply with federal, state and local confidentiality laws
- Comply with limits on data collection (relevant, appropriate, lawful and specified in privacy notice)
- Have a written policy and post it on agency website
- Must post a sign at intake or comparable location with general reasons for data collection and reference to the privacy policy

Information can be found in the following documents: *Homeless Prevention & Rapid Re-Housing Program (ESG) Quarterly Performance Reports: Elements, Response Categories and Justification*; *Homeless Management Information System (HMIS) Data Standards, Revised Draft Notice, April 2009*; and at www.HMIS.info

Process guideline:

ESG agencies should be prepared to promptly enter client and service level data into HMIS and share information within HMIS.

The head of household for each ESG participant unit must complete a release of information agreement related to HMIS data entry.

B. TRACKING SERVICES AND OUTCOMES

Services and program outputs must be tracked according to HMIS standards. See *ESG Performance Measures* for more information on tracking outcomes. To ensure consistency in tracking outcomes, ESG providing agencies must track outcomes for each activity as outlined on the Performance Measurements. Changes may be made to the performance measures, if agreed upon by the ESG providing agencies.

Additional performance outcomes may be proposed by the Continuum of Care HMIS Standards Committee. Consistent HMIS data entry will increase potential for continuum-wide ESG performance.

XII. CLIENT CONFIDENTIALITY

Each ESG providing agency must implement procedures to ensure the confidentiality of records pertaining to any individual provided with assistance and that the address or location of any assisted housing will not be made public.



Rapid Re-housing Unified Policies and Procedures

CONTENTS

1. Introduction
2. Shared Approach
3. Shared Regulatory Guidance

Appendices:

- Homeless Verification Guide and Form
- Housing Quality Standards Inspection Checklist
- Rent Reasonability Form
- Rental Assistance Agreement Template
- Client MOU Template
- VAWA Lease Addendum Template

1 Introduction

1.1 Intent

The intent of this document is to outline a shared framework for rapid re-housing programs within the jurisdiction of the Heart of Illinois Homeless Continuum of Care. The document is divided into three main sections. The first contains introductory information regarding rapid re-housing. The second outlines a shared framework for conducting rapid re-housing programming within the Continuum. The third section outlines regulatory guidance that applies to both programs. Throughout the policy, irreconcilable differences in regulation and approach between different rapid re-housing funding sources are noted.

1.2 Rapid re-housing Basics

Rapid re-housing is an intervention, informed by a Housing First approach that is a critical part of a community's effective homeless crisis response system. Rapid re-housing rapidly connects families and individuals experiencing homelessness to permanent housing through a tailored package of assistance that may include the use of time-limited financial assistance and targeted supportive services. Rapid re-housing programs help families and individuals living on the streets or in emergency shelters solve the practical and immediate challenges to obtaining permanent housing while reducing the amount of time they experience homelessness, avoiding a near-term return to homelessness, and linking to community resources that enable them to achieve housing stability in the long-term. Rapid re-housing is an important



component of a community's response to homelessness. A fundamental goal of rapid re-housing is to reduce the amount of time a person is homeless.

Target Populations

Rapid re-housing is an effective intervention for many different types of households experiencing homelessness, including those with no income, with disabilities, and with poor rental history. The majority of households experiencing homelessness are good candidates for rapid re-housing. The only exceptions are households that can exit homelessness with little or no assistance, those who experience chronic homelessness and who need permanent supportive housing, and households who are seeking a therapeutic residential environment, including those recovering from addiction.

2 Shared Approach

2.1 Shared Goal

This section discusses the Continuum's approach to homeless services and housing and the importance of this approach for rapid re-housing programs.

2.1.1 Housing First

Housing first is an approach to quickly and successfully connect individuals and families experiencing homelessness to permanent housing without preconditions and barriers to entry, such as sobriety, treatment or service participation requirements. Rapid re-housing programs will be conducted according to a housing first approach and thus will work to connect individuals with the appropriate housing opportunity, as well as any necessary supportive services, as quickly as possible.

The primary measure of the efficiency of a rapid re-housing program is the amount of time it takes to re-house households. Efficient programs typically re-house households in a couple weeks and in most cases in less than 30 days.

2.1.2 Rapid Re Housing First

Rapid re-housing is a flexible program model nimble enough to serve clients in dramatically different circumstances and to do so in a manner tailored to their needs. Any manifestation of the tools and services that rapid re-housing programs provide should be undergirded by the goal of connecting individuals to permanent housing quickly and with the proper assistance and services to ensure long-term housing stability. Housing first and adaptive assistance and services to ensure long-term stability should be the driving logic behind what client assistance packages look like on the ground.

Periodically reassessing the preferences, needs, and abilities of households assisted by rapid re-housing is critical, as this allows for the determination of whether the levels of both financial assistance and services need to be either increased or decreased. Continuum providers will implement a 'progressive engagement' approach, wherein households experiencing homelessness are given a basic level of financial and services supports. Ongoing monitoring and periodic reassessment determines if and when the basic level of assistance should be changed or increased. This allows rapid re-housing programs to be flexible and adapt to changing circumstances.



2.2 Shared Responsibility – Using the Flexibility of RRH to Better Serve Clients

This section describes the framework for case managers and program supervisors when providing services and assembling assistance packages for individual clients. This process, like other permanent housing placement, begins with pulling clients from the coordinated entry waiting list according to the Continuum's Coordinated Entry Policies and Procedures Manual. The process should then proceed to service and financial assistance planning, broken down below into two parts – case management services and financial assistance provisions.

2.2.1 Entry

The Continuum's Coordinated Entry system serves as the access point for rapid re-housing assistance.

The coordinated entry service provision model covering Peoria, Tazewell, Woodford, and Fulton Counties is designed to fulfill three primary purposes:

1. To consolidate and streamline the community wide process by which individuals experiencing homelessness can request assistance in regaining permanent housing;
2. To create a system that identifies a pathway to permanent housing for ALL individuals experiencing homelessness, including creating one where it does not yet exist; and
3. To ensure that, whenever a program has insufficient capacity to serve all consumers in their potential service population, the most vulnerable individuals experiencing homelessness are served first.

2.2.2 The Toolkit pt. 1 – Case Management

In their capacity as case managers for rapid re-housing programs, staff should be providing housing search and placement services as well as housing stability case management services. These kinds of services are necessary in order for clients to locate, obtain and maintain stability in permanent housing situations. These services include assisting the client with:

Placement

- Housing search
- Outreach and negotiation with owners
- Assistance submitting rental applications and understanding leases
- Assessing habitability and rent reasonableness of housing options
- Assistance with obtaining utilities and making moving arrangements
- Tenant counseling or referral to proper team members or service providers for counseling

Stability

- Developing, securing, and coordinating services and obtaining federal, state and local benefits
- Monitoring and evaluating program participant progress



- Providing information and referrals to other providers
- Developing an individualized housing and service plan that secures a path to permanent housing stability
- Providing or connecting clients to workforce development services and employment opportunities

All of the above are tools and areas of expertise that the case management team should be utilizing to ensure client success in quickly obtaining and retaining housing.

2.2.3 The Toolkit pt. 2 – Components of the Assistance Package

This section outlines different types of assistance that are eligible costs for rapid re-housing programs. The types of assistance act as an array of tools that the case manager can utilize in order to tailor an assistance package to the specific needs of the client. Types of assistance are outlined below by funding source. Agencies with rapid re-housing programs should seek contracts with ESG-funders and submit budgets for their CoC grants that allow for all of the below categories of assistance in order to ensure that services can be tailored to client needs.

ELIGIBLE ASSISTANCE TYPES FOR ESG & COC RRH

Rental Assistance

- Short-term rental assistance (up to 3 months)
- Medium-term rental assistance (4 to 24 months)

Financial Assistance Costs

- Rental application fees
- Security deposits (amount up to two months rent)
- Last month's rent
- Moving costs

Utility Costs

- Utility Deposits
- Utility Assistance (the manner in which utility assistance is calculated and administered varies by funding source; program managers should consult with the CoC director or ESG grant administrator to set-up their process)

Client Share Considerations



- The length of assistance is flexible and determined at the program level. It is also appropriate for programs to determine a percentage of rent that the client is required to pay. This can be phased in over time if appropriate.

ELIGIBLE ASSISTANCE TYPES UNIQUE TO ESG

Rental Assistance

- Rental Arrears (one-time payment of up to 6 months of rent in arrears, including any late fees on those arrears; if there are more than 6 months of arrears, ESG will cover most recent 6 months if housing is otherwise able to be secured)

Utility Costs

- Utility arrears (up to 6 months of payments in arrears, including any late fees on those arrears; if there are more than 6 months of arrears, ESG will cover most recent 6 months if housing is otherwise able to be secured)

The above tools (2.2.2 & 2.2.3), including case management for placement and housing stability and the rental, utility and other financial assistance types are at an RRH program's disposal. They should be utilized to put together a plan and package that will ensure permanent housing placement and long term viability of that housing for clients.

2.2.4 Putting the Tools to Work – Determining Length and Amount of Assistance

Case managers must take into consideration client vulnerability, employment, income, benefits, health, existing supports and any other relevant factors to determine a likely path toward housing stability and the most efficient assistance package that will help clients achieve that stability.

Once a case manager has made a determination and put together an assistance package that includes the types and length of assistance as well as any client-share percentages, the program supervisor must sign off on the determination.

At bottom, agencies should conduct intake according to coordinated entry procedures and utilize the above tools and methodology in order to assemble a rapid re-housing assistance package and plan for long term housing stability. The service plan should be recorded in HMIS. How this plan and package look will differ from client to client, but the process should be the same.

2.3 Shared Measures –Tracking and Reporting

An additional benefit to a shared approach and framework for rapid re-housing programs is the ability to track and report on outcomes in a uniform fashion across the Continuum.

2.3.1 Monthly Assessments

For all active clients in a rapid re-housing program. Case managers should be conducting monthly interim assessments in HMIS. Doing so will allow the Continuum to see change in a client’s situation across the time that a client spends in a rapid re-housing program.

2.3.2 Follow-up

Case managers should follow-up with clients insofar as it is necessary to ensure long-term housing stability. Housing stability will be tracked through HUD System Performance Measure 2.a.2 and 2.b which track returns to homelessness at six and twelve months and at two years. This means that the performance data will show when an individual presents at an emergency shelter or in an outreach setting after having participated in a rapid re-housing program within the past two years. Since the goal of rapid re-housing programming is permanent housing with long-term stability, returns to homeless reflect negatively on a program’s effectiveness when it comes to long-term stability.

2.3.3 Program Evaluation

Rapid re-housing programs should maintain complete and timely data in HMIS. Programs will be evaluated by the Continuum according to HUD System Performance Measures with a primary focus on placing clients into permanent housing and the long-term housing stability of those clients.

3 Shared Regulatory Guidance

3.1 Regulatory Guidance on Eligibility, Intake and Exit

There is a different set of regulations for CoCrapid re-housing than for ESG rapid re-housing. The goal of this section is to provide general regulatory guidance that, for the key areas addressed below, will guide compliance under both sets of regulations. Program managers are still responsible for ensuring that their programs are compliant in all areas covered by the regulations specific to their grant.

3.1.1 Homeless Verification

HUD’s definition of homelessness contains four distinct paragraphs. Each paragraph outlines a different scenario that might be designated ‘homelessness’ under that particular paragraph of the definition. Pursuant to 24 CFR 576.104 and the 2015 CoC NOFA § II.B.3.b. individuals and families are eligible to receive RRH assistance if they meet the criteria under paragraph (1) of HUD’s homeless definition. If an individual does not meet the requirements of paragraph (1) but does meet the requirements of paragraph (4) this person may be eligible to receive assistance through only CoC sourced rapid re-housing funds. Program managers should consult with their agency’sCoC grant manager and the CoC director with regard to eligibility and documentation for paragraph (4). No other paragraphs of the homeless definition



are eligible under ESG or CoC RRH programs. Please see the attached homeless definition guide and homeless verification worksheet. This form must be completed at intake for each client in order to establish and verify homeless status.

HOMELESS DEFINITION PARAGRAPHS 1 & 4

(Paragraphs 2&3 are never eligible definitions for Rapid Re-housing; to learn more about paragraphs 2&3 refer to 24 CFR 576.2 accessible at ecfr.gov)

Paragraph 1:

- i. An individual or family with a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings, including a car, park, abandon building, bus or train station, airport, or camping ground; **OR**
- ii. An individual of family living in a supervised publicly or privately operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional housing, and hotels and motels paid for by charitable organizations or by federal, state, or local government programs for low-income individuals); **OR**
- iii. An individual who is exiting an institution where he or she resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution

Paragraph 4:

- i. An individual or family who is fleeing or is attempting to flee, domestic violence, dating violence, sexual assault, stalking or other dangerous or life-threatening conditions that relate to violence against the individual or a family member, including a child, that has either taken place within the individual's or family's primary nighttime residence or has made the individual or family afraid to return to their primary nighttime residence; **AND**
- ii. Has no other residence; **AND**
- iii. Lacks the resources or support networks, e.g. family, friends, faith-based or other social networks, to obtain other permanent housing.

3.1.2 Release of Information

All providers should ensure that clients sign a release of information for personal information that will be shared and/or available to certain parties associated with RRH programming. Providers should execute a release that is consistent with their organization's policies regarding confidentiality and personal information.

3.1.3 HMIS Entry

Provider are required to conduct an HMIS entry assessment for all members of the household at intake.



3.1.4 Service Plan

A detailed plan outlining services, timelines and any other relevant information regarding the client's path to housing stability should be entered into HMIS.

3.1.5 Monthly Assessment

Case managers should conduct a monthly case management meeting with all clients evidenced by a new interim assessment entered into HMIS each month for each client.

3.1.6 Eligibility Re-evaluation

Providers must re-evaluate a client's eligibility and the types and amounts of assistance the client receives prior to exceeding one year of assistance. This evaluation must establish that:

- The program participant does not have an annual income that exceeds 30 percent of median family income for the area, as determined by HUD; and
- The client lacks sufficient resources and support networks necessary to retain housing without assistance

3.1.7 HMIS Exit

Providers are required to conduct an HMIS exit assessment for all members of the household at program exit.

3.2 Regulatory Guidance on Unit Condition and Rent

3.2.1 Housing Quality Standards

All units must meet HUD Housing Quality Standards (HQS) in order to be an eligible RRH Unit. An HQS checklist is attached and must be completed for each unit and retained in each client file.

3.2.2 Lead Safety Disclosure

Housing Quality Standards should be met regarding the conditions of painted surfaces and lead-based paint hazards. In addition, for any unit built before 1978, agencies must provide the most up-to-date, EPA-approved information pamphlet on identifying and controlling lead-based paint hazards ("Protect Your Family from Lead in Your Home").

3.2.3 Rent Reasonability

Units receiving rental assistance through the RRH program must have rents below the Fair Market Rent for the bedroom size established by HUD and be determined as rent reasonable in comparison to rent for other comparable unassisted units. Providers should use the attached Rent Reasonability worksheet in order to make these determinations. The rent will be considered reasonable if it is no more than \$50 higher than the average of three comparable units.

3.3 Regulatory Guidance on Assistance and Funding



3.3.1 Assistance Approvals

Once a case manager has developed a service plan and tailored an appropriate assistance package to client need, all final documentation of the financial assistance to be provided should be signed off on by both the case manager and the program supervisor. If financial assistance is paid by the funder to the landlord or third party, this guidance applies to the request for payment documentation.

3.3.2 Length of Assistance

As outlined above, the length of assistance should be tailored to client need, however, 24 months is the maximum that any client can receive assistance under RRH programming.

3.3.3 Use with Other Public Sources

Financial assistance may not be provided to clients that are receiving the same type of assistance through other public sources or programs (e.g. agencies cannot provide rental assistance to someone who has leased a unit for which there is a project-based rental subsidy).

3.3.4 Rental Assistance Agreement

The agency may make/request rental assistance payments only to/for an owner with whom the agency has entered into a rental assistance agreement. The terms of this agreement are established in the attached template rental assistance agreement.

Agencies are required to execute a memorandum of understanding with program participants receiving rental assistance in order to clarify the length and type of assistance. A template MOU is attached.

3.3.5 Back-up Documentation

Copies of leases, utility account history, and any other relevant backup material must be included with payment records and/or payment request documentation for financial assistance.

3.4 Regulatory Guidance on Fair Housing and VAWA

3.4.1 Fair Housing

Rapid Re-housing programs must comply with all applicable fair housing and civil rights requirements in 24 CFR 5.105(a), including, but not limited to, the Fair Housing Act; Title VI of the Civil Rights Act of 1964; Section 504 of the Rehabilitation Act of 1973; Title II and Title III of the Americans with Disabilities Act of 1990; and Section 109 of the Housing and Community Development Act of 1974.

3.4.2 Violence Against Women Act (VAWA)

Rapid Re-housing providers are considered covered housing providers under VAWA and must be in compliance with 24 CFR part 5 Subpart L as supplemented by ESG or CoC regulations in the HUD VAWA Final Rule. Providers must be in compliance with all CoC policies regarding VAWA.