



City of Peoria 2019 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 City of Peoria is pleased to present its 2019 Annual Action Plan. The Plan sets forth the investment priorities and activities of the City during its 2019 program year (January 1, 2019 to December 31, 2019). The City receives funding for these activities from the United States Department of Housing and Urban Development (HUD). The City is an entitlement community with HUD and receives annual allocations from three formula grants – Community Development Block Grant (CDBG), HOME Investment Partnership Grant (HOME) and Emergency Solutions Grant (ESG). A total of over \$2.5 million, comprised of the CDBG allocation (\$1,766,783), HOME allocation (\$655,929) and ESG allocation (\$145,529), will be received for program year 2019.

The 2019 Annual Action Plan is the sixth year of the City's 2014-2019 Consolidated Plan. In 2017, the City received a one year extension of its consolidated plan to include 2019. The Consolidated Plan is designed to help the City assess affordable housing and community development needs in order to make data-driven, place-based investment decisions. The consolidated planning process serves as the framework for a community-wide dialogue to identify housing and community development priorities that align and focus HUD funding from the CDBG, HOME and ESG programs. The Consolidated Plan is carried out through Annual Action Plans, which provide a concise summary of the actions, activities and the specific federal and non-federal resources that will be used each year to address the priority needs and specific goals identified by the Consolidated Plan. The City will report on accomplishments and progress toward Consolidated Plan goals and Annual Action Plan activities in the Consolidated Annual Performance and Evaluation Report (CAPER).

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 objectives and outcomes of this Annual Action Plan are from the 2014-2019 Consolidated Plan and are attached below. The attachment demonstrates the link between these objectives and outcomes and the planned 2019 projects. Throughout the Plan, the investment of funds and planned activities refer to the CDBG Target Area, which are low-income areas in the city, where 51% or more of the resident

households have reported incomes at 80% or less than the area median income for Peoria County. Attached below is a map of the CDBG Target Area.

3. Evaluation of past performance

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

The overall performance and progress for the City is good. The City has not received the end of year program letter for 2018 yet. For program year 2017, HUD requested an additional copy of the response to the 2016 end of year letter and a revised PR 26 for 2016 and 2017. No other outstanding issues were identified by the end of year letter. As of November 2018, the City's CDBG expenditure rate is at 1.49, which meets the CDBG requirements.

The City is in compliance with ESG fund commitments (180 days after the date that HUD signs the grant agreement), fund expenditures (24 months after the date that HUD signs the grant agreement) and grant percentage restrictions (7.5% for administration and 60% for shelter costs) for its 2018 ESG grant allocation.

Specific activity and project accomplishments for the City's 2018 HUD grant allocations can be found in the 2018 Consolidated Annual Performance and Evaluation Report (CAPER). In 2019, the City will continue to explore additional funding opportunities and efficiencies in programming and services, with the goal of providing a better product to our citizens. The City will work to address barriers to affordable housing as well as obstacles to meeting the housing and non-housing needs of the community. The City will also continue to develop and create partnerships with other organizations and community stakeholders to better serve the low-income population.

4. Summary of Citizen Participation Process and consultation process

Summary from citizen participation section of plan.

For the creation of the 2019 Annual Action Plan, the citizen participation process was based on the City's adopted Citizen Participation Plan. 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 2019 Annual Action Plan. The detailed results of the citizen participation process can be viewed in section AP-12: Participation of this Annual Action Plan and in the attachments section under Citizen Participation.

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		COMMUNITY DEVELOPMENT
HOPWA Administrator		
HOME Administrator		COMMUNITY DEVELOPMENT
ESG Administrator		COMMUNITY DEVELOPMENT
HOPWA-C Administrator		COMMUNITY DEVELOPMENT

Table 1 – Responsible Agencies

Narrative (optional)

The lead agency responsible for the 2019 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 2019 Annual Action Plan, please contact Kathryn Murphy, Senior Grants Coordinator, at the City of Peoria, 419 Fulton Street, Room 300, 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 2019 Annual Action Plan. 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 has a good relationship with the Peoria Housing Authority (PHA) and other assisted housing providers. Since a new executive director took over last year, the City has had regular meetings and updates on the PHA activities and future plans. The City has also used its CDBG funds to provide match funds for the Peoria City/County Health Department's Lead Hazard grant and its residential lead mitigation programs. The City has an established relationship with Habitat for Humanity, Peoria Citizens Committee for Economic Opportunity and the Peoria Opportunities Foundation, all of which are certified CHDOs. The City has strong relationships and coordination with private and government health, mental health and service agencies. The City was an active participant in the first regional community health improvement plan, which includes behavioral health as a priority for the area. A Grants Management staff member also sits on the Reproductive Health workgroup, which aims to reduce racial disparities in birth outcomes in the Peoria-area. The Community Development Department is also involved in a cross-sector project called Invest Health, funded by the Robert Wood Johnson Foundation, to address the social determinants of health in the community. In addition, through the CoC and ESG, City staff collaborate regularly in program delivery and planning with the South Side Office of Concern, a private non-profit housing and mental health provider.

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 is pleased with the direction and strength of the Continuum of Care. Successful board member recruitment has drawn individuals from across sectors, widening its reach, while the hiring of a Continuum Director has increased its capacity. In all efforts to address the needs of homeless persons and persons at risk of homelessness, City staff collaborate with the CoC director and key CoC members and service providers. City staff participate in strategic planning and policy discussions as well as sit on the Governing Board of the CoC as a non-voting advisory member. City staff and CoC staff or CoC members are in weekly conversation regarding planning and program delivery.

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

A City staff member serves as a non-voting member of the Governing Board of the CoC and participates in General Membership meetings. As a governing board member and active participant in CoC task groups, the City is an instrumental participant in the development of policies, procedures and performance measures for ESG and the Continuum.

To better align the consultation related to ESG funding allocations, the City Council approved the reassignment of funding recommendations to the HOIHCOC from the Advisory Commission on Human Resources (HRC), a standing City Commission. Historically, the HRC Commissioners would review, rank and make funding recommendations to the City Council for approval. Since 2014, that process is 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 and provider capabilities to comply with ESG regulations and opportunities to leverage other funding. ESG subgrantee grants are awarded on two-year terms. 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, requiring communication among service providers regarding how to best allocate funds for the most needed services.

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	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 letter. 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 PHA to improve the programming and outcomes of the 2019 Annual Action Plan.

2	Agency/Group/Organization	HEART OF ILLINOIS CONTINUUM OF CARE
	Agency/Group/Organization Type	Housing PHA 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 Health Agency 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 HOPWA Strategy 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 Homeless Continuum of Care was made aware of the Annual Action Plan at monthly meeting. City staff discussed the 2019 Annual Action Plan and its role in carrying out grant activities. City Staff invited 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.
3	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 letter. 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 2019 Annual Action Plan.
4	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 letter. 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 2019 Annual Action Plan.
5	Agency/Group/Organization	COUNTY OF PEORIA
	Agency/Group/Organization Type	Other government - County Major Employer

	<p>What section of the Plan was addressed by Consultation?</p>	<p>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>
	<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 letter. 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 2019 Annual Action Plan.</p>

6	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 letter for the overall 2019 Annual Action Plan goals, objectives and activities. Additional consultation through staff meetings were held to discuss the Health Department's CDBG funded match program activity identified in the 2019 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 letter. 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 2019 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 letter. 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 2019 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 letter. 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 2019 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 letter. The City anticipates that those consulted will provide comments regarding their own areas of expertise to improve the programming and outcomes of the 2019 Annual Action Plan.
12	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 letter. The City anticipates that those consulted will provide comments regarding their own areas of expertise to improve the programming and outcomes of the 2019 Annual Action Plan.

13	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 letter. The City anticipates that those consulted will provide comments regarding their own areas of expertise to improve the programming and outcomes of the 2019 Annual Action Plan.

14	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 letter. 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 2019 Annual Action Plan.
15	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 letter. 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 2019 Annual Action Plan.
16	Agency/Group/Organization	Illinois Department of Public Health
	Agency/Group/Organization Type	Other government - State

	<p>What section of the Plan was addressed by Consultation?</p>	<p>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>
	<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 letter. 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 2018 Annual Action Plan.</p>
18	<p>Agency/Group/Organization</p>	<p>Illinois Department of Commerce and Economic Opportunity</p>
	<p>Agency/Group/Organization Type</p>	<p>Other government - State</p>
	<p>What section of the Plan was addressed by Consultation?</p>	<p>Housing Need Assessment Non-Homeless Special Needs Market Analysis Economic Development Anti-poverty Strategy</p>
	<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 letter. 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 2018 Annual Action Plan.</p>

19	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 letter. 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 2019 Annual Action Plan.
20	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 letter. The City anticipates that those consulted will provide comments regarding their own areas of expertise to improve the programming and outcomes of the 2019 Annual Action Plan.

21	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 letter. The City anticipates that those consulted will provide comments regarding their own areas of expertise to improve the programming and outcomes of the 2019 Annual Action Plan.
23	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 letter. 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 2019 Annual Action Plan.

24	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 letter. The City anticipates that those consulted will provide comments regarding their own areas of expertise to improve the programming and outcomes of the 2019 Annual Action Plan.

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 Homelessness Continuum of Care	Both the City and the HOIHCO work to end homelessness, following HUD regulations and key initiatives. The goals of the Strategic Plan have been coordinated with those of the Heart of Illinois Homeless Continuum of Care to make sure that areas of need are addressed.
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 2019 Annual Action Plan, the City followed the City Council adopted Citizen Participation Plan. The 30-day comment period included public hearings and consultation with local organizations. Mailings 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 2019 Annual Action Plan.

Public hearings were held to obtain citizen comments on issues related to the housing, non-housing and community development needs in the City. Two public hearings will be held on Tuesday, April 30. Public notices for each hearing were published in the Peoria Journal Star newspaper. These public hearings allowed the public to comment on the development of the 2019 Annual Action Plan.

A draft copy of the 2019 Annual Action Plan was made available for public review and comment from April 24 to May 23. Public notice of the 30-day comment period was published in the Peoria Journal Star newspaper. Copies of 2019 draft Annual Action Plan were available for review at the following locations:

- City of Peoria City Clerk's Office
- City of Peoria Community Development Department's office
- Posted on City of Peoria website
- Peoria Public Library, Downtown Branch

The plan will go before the City Council on June 11 and is subject to any changes requested by the Council during the meeting fitting federal regulations.

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	Public Meeting	Non-targeted/broad community homeless	One General Membership Meeting of the Heart of Illinois Homeless Continuum of Care regarding the open public comment period of the City's 2019 Annual Action Plan.	No comments received during the meeting regarding the plan.		

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)
2	Newspaper Ad	Non-targeted/broad community	<p>Published Legal Notice in Peoria Journal Star regarding open public comment period of the City's 2019 Annual Action Plan.</p> <p>Annual Action Plan 2019</p>	<p>Two comments were received regarding the land policy of the City for CHDO's. The City's current policy is to not transfer any land in the North Valley neighborhood until neighborhood planning efforts are complete. Plan language was altered to clarify this point. Additional comments were received regarding CHDO funds being available City-wide as the developer chooses the location. Comments were received regarding our citizen participation plan and inclusion of neighborhood associations. The citizen participation</p>	27	

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	Public Hearing	Non-targeted/broad community	Two public hearings were held on April 30 at City Hall for public comment on the draft 2019 Annual Action Plan. Legal Notice of the public hearings were published on April 23 in the Peoria Journal Star.	No comments were received at the hearings.		
4	Letter	Non-targeted/broad community	Letters were sent to state and local agencies as well as area non-for profit organizations soliciting comments on the draft 2019 Annual Action Plan. A list of agencies and organizations contacted are included in section AP-10: Consultation.	The Peoria City/County Health Department wrote a letter of support for the Plan highlighting the partnership for the lead match program and the health department partnership program.		

Table 4 – Citizen Participation Outreach

Expected Resources

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

Introduction

On April 12 the Office of Community Planning and Development for HUD announced the FY 2019 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 2019 program year: \$1,877,365.32 in CDBG funds; \$668,471.76 in HOME funds; and \$145,529 in ESG funds. The City's 2019 program year is from January 1, 2019 to December 31, 2019.

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	1,877,365	0	112,886	1,990,251	0	\$112,885.58 in prior year funds are being reallocated from projects that were under budget. This is the last year of the City's Consolidated Plan. Please see below regarding how these funds will be leveraged.

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	668,472	0	12,543	681,015	0	\$12,542.76 in prior year resources are being reallocated. This is the last year of the City's Consolidated Plan. Please see below regarding match requirements and how these funds will be leveraged.
ESG	public - federal	Conversion and rehab for transitional housing Financial Assistance Overnight shelter Rapid re-housing (rental assistance) Rental Assistance Services Transitional housing	145,529	0	0	145,529	0	There are no prior year resources that are to be reallocated. This is the last year of the City's Consolidated Plan. Please see below regarding the match requirements and how these funds will be leveraged.

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

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 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 in program year 2019, 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 conducts a rehab program for City-owned properties the abandoned property process via demolition court. The program allows qualified individuals, neighborhood association, nonprofits or 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

None.

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	Focus Area Housing Program Leverage	2014	2018	Affordable Housing		Affordable Housing - New construction Affordable housing - Rehab of existing units Public Improvements and Infrastructure	CDBG: \$600,000 HOME: \$508,472	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 200 Persons Assisted Rental units constructed: 3 Household Housing Unit Housing Code Enforcement/Foreclosed Property Care: 2000 Household Housing Unit
2	PCCDH Lead Match Program	2014	2018	Affordable Housing		Affordable housing - Rehab of existing units	CDBG: \$150,000	Homeowner Housing Rehabilitated: 10 Household Housing Unit
3	Roof Housing Rehabilitation Program	2014	2018	Affordable Housing		Affordable housing - Rehab of existing units	CDBG: \$539,669	Rental units rehabilitated: 10 Household Housing Unit Homeowner Housing Rehabilitated: 20 Household Housing Unit

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
4	CHDO Set Aside	2014	2018	Affordable Housing		Affordable Housing - New construction Affordable housing - Rehab of existing units	HOME: \$110,000	Homeowner Housing Added: 2 Household Housing Unit
5	Public Service Set Aside	2014	2018	Non-Housing Community Development		Public Services	CDBG: \$265,000	Public service activities other than Low/Moderate Income Housing Benefit: 1500 Persons Assisted
6	Emergency Solutions Grant	2014	2018	Homeless		Homeless- Emergency Shelter Homelessness - Rapid Re-housing	ESG: \$145,529	Tenant-based rental assistance / Rapid Rehousing: 10 Households Assisted Homeless Person Overnight Shelter: 500 Persons Assisted
7	Planning / General Administration	2014	2018	Planning / General Administration			CDBG: \$265,000 HOME: \$50,000 ESG: \$0	
8	Housing Rehabilitation Delivery	2014	2018	Affordable Housing		Affordable housing - Rehab of existing units	CDBG: \$60,000	

Table 6 – Goals Summary

Goal Descriptions

1	Goal Name	Focus Area Housing Program Leverage
	Goal Description	<p>This goal will focus on housing related activities in specific eligible area(s) with additional outside investment.</p> <p>HOME funded housing activities related to this goal could include rehab of owner occupied units, rehab of rental units, new construction of rental units, new construction and rehab of homebuyer units and/or homebuyer direct assistance. CDBG funding related to this goal could include public facilities, economic development, public improvements and infrastructure, or rehabilitation. This goal will be accomplished through either identified City subreipients or City administered programs. The allocated funding will be used to support targeted neighborhood strategies in an identified geographic area. Prioritization of funding will be given to activities that are also located 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).</p> <p>Other CDBG funded activities related to this goal will include code enforcement activities. Specific activities will include code enforcement inspections and staff related costs. This activity will only occur in the CDBG Target Area that is considered deteriorated or deteriorating by the City.</p>
2	Goal Name	PCCDH Lead Match Program
	Goal Description	<p>This goal 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 61602 and 61603 which have the highest number of reported child lead poisoning in Peoria County. The zip codes 61602 and 61603 are located 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).</p>
3	Goal Name	Roof Housing Rehabilitation Program
	Goal Description	<p>This goal is to install new roofing, associated materials, and provide other rehabilitation services to ensure a property is habitable and code compliant on eligible single family homes including accessibility modifications. The activity is city-wide, but will be prioritized for 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).</p>

4	Goal Name	CHDO Set Aside
	Goal Description	This goal is to create housing units for low income eligible households using no less than 15% of HOME funds from the 2018 allocation. This goal will be associated with activities completed only by certified Community Housing Development Organizations (CHDO). The City will certify an organization's CHDO status prior to committing any HOME funds under this goal/activity. The activity is city-wide, but will be prioritized for 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).
5	Goal Name	Public Service Set Aside
	Goal Description	This goal is to provide a variety of public services to be utilized by low income residents. This goal will be accomplished through the City's subgrantee agreements with local service providers.
6	Goal Name	Emergency Solutions Grant
	Goal Description	This goal will provide rapid re-housing assistance and emergency shelter to eligible individuals who are homeless. Additionally, this goal will include funds for grant administration and HMIS (Homeless Management Information System) activities. The City will partner with the Heart of Illinois Homeless Continuum of Care for funding allocation and goal performance. Goals are increasingly focused on maximizing exits to permanent housing and minimizing returns to homelessness. ESG grantees are now required to set goals for how many of their participants will exit to permanent locations regardless of whether it is an emergency shelter program or rapid rehousing program.
7	Goal Name	Planning / General Administration
	Goal Description	This goal 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 Strategic Plan Goal for ESG. The total amount of administration allocated in ESG is \$9,700 for program year 2018.
8	Goal Name	Housing Rehabilitation Delivery
	Goal Description	This goal is for 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. This goal's outcome indicators will be reported in the PCCDH Lead Match Program and the Roof Housing Rehabilitation Program.

Projects

AP-35 Projects – 91.220(d)

Introduction

The projects listed below will address the high priority needs in 2019.

Projects

#	Project Name
1	Competitive Grant Program
2	PCCHD Lead Match Program
3	Housing Rehab Programs
4	CHDO
5	Public Service
6	ESG19 Peoria
7	Code Enforcement
8	Planning/General Administration
9	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 contained in the City's 2014-2019 Consolidated Plan. Funding priorities have not changed from those outlined in the Consolidated Plan. A known obstacle in addressing these needs is the yawning gap between resources and demonstrated need. That is, as funding from previous grant allocations continues to decrease, 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 ten 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.

AP-38 Project Summary
Project Summary Information

1	Project Name	Competitive Grant Program
	Target Area	
	Goals Supported	Focus Area Housing Program Leverage
	Needs Addressed	Affordable Housing - New construction
	Funding	CDBG: \$350,000 HOME: \$508,471
	Description	Consistent with HUD Field Office Guidance at Grantee Meetings and in pursuit of the most effective project outcomes for Peoria neighborhoods, the City is adopting a high impact project approach to CDBG and HOME funds. In order to pursue high impact projects the City is aggregating HOME and CDBG funds toward a single competitive grant program on an annual basis. The program will utilize the City's neighborhood planning and outreach efforts as groundwork to establish goals and desired outcomes for neighborhoods and corridors based on research and community input. Planning and outreach efforts will be followed with the release of a funding availability notice soliciting proposals for high impact projects that meet goals established via neighborhood planning and outreach. The release process will outline eligible projects based on grant requirements and evaluate proposals based on how well they meet the goals established by neighborhood planning and outreach. Projects will be underwritten in accordance with CDBG and HOME underwriting standards and monitored long-term consistent with activities conducted. \$12,542.76 in prior year HOME funds will be reallocated to this project.
	Target Date	12/31/2021
	Estimate the number and type of families that will benefit from the proposed activities	Approximately 20 low income families will be assisted with this project.
	Location Description	This project will take place in the South Village neighborhood of the City of Peoria based on existing neighborhood plans.
	Planned Activities	HOME funded housing activities related to this project could include rehab of owner occupied units, rehab of rental units, new construction of rental units, new construction of homebuyer units and/or homebuyer direct assistance. CDBG funding related to this project could include public facilities, economic development, public improvements and infrastructure, or rehabilitation. Activities will be based on the responses to the NOFA for this project.

2	Project Name	PCCHD Lead Match Program
	Target Area	
	Goals Supported	PCCDH Lead Match Program
	Needs Addressed	Affordable housing - Rehab of existing units
	Funding	CDBG: \$150,000
	Description	This project will provide matching funds to the Peoria/City County Health Department's lead abatement program serving low-income residents. These funds may be used to leverage an anticipated \$3.2 million grant to be applied for by the Health Department. The project is city-wide, but will primarily serve the zip codes of 61605 and 61603 which have the highest number of reported child lead poisoning in Peoria County. The zip codes 61605 and 61603 are located in the CDBG Target Area.
	Target Date	12/31/2020
	Estimate the number and type of families that will benefit from the proposed activities	Approximately 10 low income families will be assisted by this project.
	Location Description	This project will provide matching funds to Peoria City/County Health Department's lead abatement program serving low-income residents. These funds may be used to leverage an anticipated \$3.2 million grant to be applied for by the Health Department. The project is city-wide, but will primarily serve the zip codes of 61605 and 61603 which have the highest number of reported child lead poisonings in Peoria County. The zip codes 61605 and 61603 are located in the CDBG Target Area.
Planned Activities	This rehab activity will conduct lead inspections, risk assessments, mitigation, and clearance activities under the Peoria City/County Health Department's Lead Hazard Control grant to serve low-income residents in the City of Peoria.	
3	Project Name	Housing Rehab Programs
	Target Area	
	Goals Supported	Roof Housing Rehabilitation Program
	Needs Addressed	Affordable housing - Rehab of existing units
	Funding	CDBG: \$539,668

	Description	This project will include rehabilitation of income eligible units within the City of Peoria. Activities could include whole house rehabilitation, lead mitigation, roof replacement, emergency repair, accessibility ramps or other rehabilitation activities. Prior year resources of \$112,885.58 will be reallocated to this project.
	Target Date	12/31/2020
	Estimate the number and type of families that will benefit from the proposed activities	Approximately 30 low income families will be assisted by this project.
	Location Description	City-wide
	Planned Activities	This project will include rehabilitation of income eligible units within the City of Peoria. Activities could include whole house rehabilitation, lead mitigation, roof replacement, emergency repair, accessibility ramps, or other rehabilitation activities.
4	Project Name	CHDO
	Target Area	
	Goals Supported	CHDO Set Aside
	Needs Addressed	Affordable Housing - New construction
	Funding	HOME: \$110,000
	Description	This project is to create housing units for low-income eligible households by certified Community Housing Development Organizations (CHDO).
	Target Date	
	Estimate the number and type of families that will benefit from the proposed activities	Approximately 1 low income family will be assisted through this project.
	Location Description	city-wide
	Planned Activities	This project is to create housing units for low income eligible households by certified Community Housing Development Organizations (CHDO).
5	Project Name	Public Service
	Target Area	
	Goals Supported	Public Service Set Aside
	Needs Addressed	Public Services

	Funding	CDBG: \$265,000
	Description	This activity is to provide a variety of public services to be utilized by low income residents. This will be accomplished through the City's subrecipient agreements with local service providers. The City Council-approved funding priorities for 2018 are: Youth Services, Employment and Training, Child Care Services, Abused and Neglected Children, Health Services, Substance Abuse Services, and Mental Services.
	Target Date	12/31/2019
	Estimate the number and type of families that will benefit from the proposed activities	Approximately 1500 low income families will be assisted.
	Location Description	City-wide.
	Planned Activities	This activity is to provide a variety of public services to be utilized by low income residents. This will be accomplished through the City's subrecipient agreements with local service providers. The City Council approved funding priorities for 2019 are: Youth Services, Employment and Training, Child Care Services, Abused and Neglected Children, Health Services, Substance Abuse Services, and Mental Health Services.
6	Project Name	ESG19 Peoria
	Target Area	
	Goals Supported	Emergency Solutions Grant
	Needs Addressed	Homeless-Emergency Shelter Homelessness - Rapid Re-housing
	Funding	ESG: \$145,529
	Description	This activity will provide rapid rehousing assistance and emergency shelter to individuals who are homeless. Additionally, this activity will include funds for grant administration and HMIS (Homeless Management Information System). The City will partner with the Heart of Illinois Homeless Continuum of Care for funding allocation and goal performance. In addition, administration costs for staff (\$9,700) will be retained by the City for general management, oversight and coordination of the ESG program.
	Target Date	7/1/2021

	Estimate the number and type of families that will benefit from the proposed activities	Approximately 315 homeless families will be assisted with this project.
	Location Description	Activities will take place at area homeless shelters and apartments located city-wide for rapid rehousing.
	Planned Activities	This activity will provide rapid re-housing assistance and emergency shelter to individuals who are homeless. Additionally, this activity will include funds for grant administration and HMIS (Homeless Management Information System). The City will partner with the Heart of Illinois Homeless Continuum of Care for funding allocation and goal performance. In addition, administration costs for staff (9,700) will be retained by the City for general management, oversight, and coordination of ESG funded programs.
7	Project Name	Code Enforcement
	Target Area	CDBG Target Area
	Goals Supported	Focus Area Housing Program Leverage
	Needs Addressed	
	Funding	CDBG: \$250,000

<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>12/31/2020</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.
8	Project Name	Planning/General Administration
	Target Area	
	Goals Supported	Planning / General Administration
	Needs Addressed	
	Funding	CDBG: \$265,000 HOME: \$50,000
	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 ESG18 activity. The total amount of administration allocated to ESG is \$9,700 for program year 2019.
	Target Date	12/31/2021
	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 ESG18 activity. The total amount of administration allocated to ESG is \$9,700 for program year 2019.
9	Project Name	Housing Rehabilitation Delivery
	Target Area	
	Goals Supported	Housing Rehabilitation Delivery
	Needs Addressed	Affordable housing - Rehab of existing units
	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	12/31/2020
Estimate the number and type of families that will benefit from the proposed 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.
Location Description	City-wide
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

The CDBG Target Area includes Census Tracts (CT) and Block Groups (BG) where at least 51% of the resident households have reported incomes that are 80% or below the area median income. In early 2019 new HUD data was released that was effective April 1, 2019. The target areas listed below are from this updated data set. The CDBG Target Area is also referred to as Peoria’s Low Income Area.

The CDBG Target Area includes the following Census Tracts (CT) and Block Groups (BG): CT 1 BG 1; CT 2 BG 1,2,3; CT 3 BG 1,2,3; CT 5 BG 1,2,3; CT 6 BG 1,2,3,4; CT 9 BG 1; CT 12 BG 1; CT 13 BG 1; CT 15 BG 1,2; CT 16 BG 1,2,3; CT 18 BG 1,2,3; CT 19 BG 1; CT 20 BG 1,2; CT 21 BG 1,2,3,4,5,6; CT 22 BG 1,2,3,4,5; CT 23 BG 1,2,3; CT 24 BG 1,2,3,4; CT 25 BG 1,2,3,4; CT 26 BG 1,2; CT 27.01 BG 1,2,3; CT 27.02 BG 1,2,3; CT 28 BG 1,2,3; CT 29 BG 1,2,3; CT 30 BG 1,2,3,4,5; CT 31.01 BG 1,2,3; CT 31.02 BG 1,2,3,4; CT 32 BG 1,2; CT 33 BG 1,2; CT 34.01 BG 1,2,3,4; CT 34.02 BG 1,2; CT 36.01 BG 1; CT 36.02 BG 1,2,3,4,5; CT 37 BG 1,2; CT 38 BG 1,2; CT 39 BG 1,2,3,4; CT 40 BG 1,2,3; CT 41.01 BG 1,2,3; CT 41.02 BG 1,2; CT 42 BG 1,2,3; CT 43 BG 1,2; CT 44 BG 1,2,3,4; CT 45 BG 1,2,3,4; CT 46 BG 1,2,3,4; CT 48.01 BG 1,2,3; CT 48.02 BG 1,2,3; CT 49.01 BG 1,2,3,4; CT 49.02 BG 1,2,3; CT 50 BG 1,2,3;

In order to calculate the percentage of allocation/investment, City staff includes the expenditures from the CDBG and HOME grants that were invested specifically into housing units/real property located in the Target Area, divided by the total amount of CDBG and HOME funds expended in the program year (excluding administrative costs). These expenditures could include activities for demolition/clearance, housing rehab programs, CHDO projects, code enforcement, ADA ramp/public infrastructure, construction of new units, homebuyer assistance, and other affordable housing projects. Allocations for administration, public service, housing delivery and ESG costs will be excluded from the calculation of the percentage, as these expenditures are not specifically invested into real property.

Geographic Distribution

Target Area	Percentage of Funds
CDBG Target Area	70

Table 8 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

The basis for giving priority to the allocation of investments geographically to the CDBG Target Area is to utilize available resources that address priority needs that will have a desired, and when possible, measurable positive impact in the area where there is the most need.

Discussion

The 70% investment is a goal of the City for its 2019 Annual Action Plan to allocate available funding in an area of the community where there is the greatest need and where the majority of low-income households reside, thereby encouraging concentrated impact. However, specific to the CDBG program, 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 2017, 2018 and 2019.

Affordable Housing

AP-55 Affordable Housing – 91.220(g)

Introduction

The 2019 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	41
Special-Needs	0
Total	56

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	40
Acquisition of Existing Units	0
Total	56

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 2019 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 30; PCCHD Lead Grant Match Program 10

AP-60 Public Housing – 91.220(h)

Introduction

The Peoria Housing Authority (PHA) is the sole housing authority located in the City of Peoria and primarily serves the Central Illinois region. The PHA provides both tenant-based and project-based Section 8 voucher programs as well as manages four (4) housing developments owned by the Authority. The PHA offers many services to its residents, including but not limited to the following: Access to Resource and Referral Opportunities (ARRO) program, Family Self-Sufficiency (FSS) Program, AmeriCorps service members and the National Association of Housing and Redevelopment Officials (NAHRO) Training Center. PHA is under new management as of 2018. See below for further detail.

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

The City will seek to foster a strong working relationship with PHA leadership to support the needs of public housing in the community. In 2017, staff from both agencies were planning for a collaborative Assessment of Fair Housing. Since HUD has delayed the rule and PHA's management has changed, this process has been put on hold. The City will seek to collaborate in some capacity with the PHA for future fair and affordable housing planning.

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

The PHA has continued its efforts to engage residents in management through resident councils and committees. One asset management property currently has an active resident council: Sterling Towers. Another major public housing property, Taft Homes, is in flux as redevelopment/RAD discussions and planning are in process. The PHA also has various savings and incentive programs for residents to encourage homeownership.

The ARRO program services supplement the FSS program and provide resources for residents to prepare for utility placement. In addition, PHA collaborates with local HUD certified housing organizations to provide financial literacy services and homeownership counseling for households in public housing.

The AmeriCorps service members are focused specifically on employment skills, coaching, training and job referrals to facilitate the outcome of obtaining employment for families who reside at Taft Homes, Harrison Homes and other scattered sites. The ARRO is a resident intern program for public housing residents that provides counseling services and self-sufficiency advocacy. Both of these programs also work with families who need additional resources to improve quality of life and may help with obtaining social security, budgeting, caregiver assistance, etc. The Family Self-Sufficiency (FSS) Coordinator for public housing focuses on developing family training plans with goals related to creating economic

independence and increasing family wealth through employment, education and financial literacy. There are homeownership goals for public housing that are related specifically to providing homeownership education services with purchasing a home as a long-term goal.

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

The Peoria Housing Authority recently entered into an agreement with the Springfield Housing Authority to provide management of Peoria's Public Housing. The PHA board feels that the Springfield Housing Authority's outstanding record in public housing can assist the local authority to improve its status with HUD. The City will continue to provide other assistance as needed to ensure the improvement of the local housing authority.

Discussion

No additional information is needed.

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

Introduction

The City's objectives under the 2019 Annual Action Plan, consistent with Continuum of Care (CoC) priorities, are to continue to fund Rapid Rehousing Assistance as well as Emergency Shelter operations and HMIS activities. The City was an active participant in the launching of a coordinated entry system and will continue to assist in the success of the new system. The City and the CoC are excited about the direction of the CoC, its strengthened capacity and its ability to do the work of ending 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 will continue to support the Heart of Illinois Homeless Continuum of Care (HOIHCOC) annual Point-in-Time Count and Housing Inventory Count. The City will require a formerly homeless or currently homeless individual to participate in the HOIHCOC and have input in the allocation of ESG funding to best assess the funded activities and needed services.

The City funds a Rapid Rehousing program via the South Side Office of Concern (SSOC) with ESG dollars. This program is supported at SSOC by a PATH outreach grant through the State Department of Human Services. Outreach workers employed through this grant are in regular contact with unsheltered persons and have been successful in leading several individuals to housing.

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

In 2016, The Salvation Army Day Center closed its doors and the Continuum lost its only shelter for single men that provided both day and night time shelter and services. As reported in the 2016 CAPER, the City, in collaboration with the local United Way and the County government, locally funded the re-opening of a day center for individuals experiencing homelessness. The City committed \$63,860 to the operational costs of the day center for one year, while the CoC undertook a process of strategic planning to identify the best way forward.

During the course of 2017, this strategic planning effort proved successful. The CoC, United Way, City, County and local providers held meetings that led to a sustainably-funded collaboration supporting two 24/7 shelters with case management services – one for single men at the Salvation Army and one for women and families at the Dream Center (previously a night-time shelter). The CoC did this by reorienting ESG and NOFA funds to support expanded capacities at these shelters. The CoC also secured a funding commitment from a local health care system to support Case Managers from South Side Office of Concern, a licensed mental health care provider, to operate in the Salvation Army shelter. The shelter has been framed as an interim housing location in which intensive case management is provided to connect individuals and families with permanent housing as quickly as possible. In addition, the City awarded \$400,000 to Dream Center Peoria for shelter renovations in order to meet the needs of individuals in a shelter that is now open 24 hours a day 7 days a week as an interim shelter.

As of the 2017 NOFA results, the CoC no longer supports any Transitional Housing programs. All transitional housing units were converted to permanent housing units. This was a strategic effort undertaken by the CoC Board because of HUD's emphasis on PSH and its more effective outcomes. The CoC Board sent a letter to providers encouraging this transition and all providers were supportive and submitted projects as reallocations in order to operate as PSH units resulting in this dramatic increase.

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 most directly supports the effort of helping homeless persons make the transition to permanent housing and independent living through the funding and administration of its rapid rehousing program. The program has seen success in permanently housing individuals in a rapid and efficient manner and in a fashion that allows individuals to achieve independent and community-based living. City staff see themselves not only as grant administrators but as advocates for individuals experiencing homelessness and liaisons to the homeless services network. Whether this means helping other ancillary services providers navigate that network or referring individuals experiencing homelessness to service providers and outreach teams. The City plans to continue funding rapid rehousing and acting as liaisons and advocates for those supported by the program or experiencing other needs.

City staff chaired the CoC's strategic planning task group while CoC-wide rapid rehousing policies were developed. The main goal of these policies was to provide a straightforward guide to compliance under both CoC-funded and ESG-funded rapid rehousing regulations and to encourage the best possible RRH programming. The final policy emphasizes that providers tailor assistance packages and service provision to each client according to their needs with the goal of rapidly accessing permanent housing and provide

a stable foundation of assistance and support that prevents individuals and families from becoming homeless again. This policy was newly approved and in place in the beginning of 2018 and ESG funded RRH programs are expected to be in compliance with the new policy.

Part of the City's effort in ensuring that individuals and families who were recently homeless do not become homeless again is to closely monitor rapid rehousing program coordinators via monthly reports and regular contact to ensure client progress in stability, self-sufficiency and indicators of such (e.g. income, health coverage, access to benefits, etc.) so that assistance is not merely rent paid but housing stability developed. The client has the choice whether or not to participate in any service offered, however the City ensures that resources are made readily available and accessible to clients by program coordinators and outreach personnel.

The CoC now has a robust and engaged board, a full-time staffed director, a history of providing access to permanent housing, and a strong momentum towards making strategic changes in order to establish an accessible and efficient, coordinated entry system at its front door connected to an expansive network of housing options. The implementation of this system will shorten the period of time that individuals and families experience homelessness and facilitate access to housing units.

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

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 funds various rehab programs using HUD funds, such as its roof replacement program and emergency repair program, to remediate situations that might render a property uninhabitable. The City also grants local dollars to a housing rehab program that does various rehab projects for low-income families. Further, in 2018, the City applied for and was awarded a grant from the state housing

development authority to operate an accessibility rehab program, which will ensure that individuals with disabilities can afford the necessary modifications to live to their full potential. This program was active in 2018. The City sees each intervention of this kind as preemptively reducing the number of incidents of homelessness throughout the city.

City Community Development staff continue to work with the Police Department in order to encourage that officers contact local homeless outreach services when they encounter individuals or families experiencing homelessness.

In addition, the CoC has recognized the need to include individuals from various sectors in its governing board to help navigate connections among homelessness, health, disability and youth, providing the most coordinated services possible.

Discussion

In the above ways, the City, alongside its many partners, seeks to reduce homelessness. 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 2019.

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 are reported in the City's Consolidated Annual Performance Evaluation Report (CAPER).

The City will also support the following actions in 2019 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
- Peoria City Council will hold another policy session on affordable housing in 2019
- Continue collaboration with the Peoria City/County Health Department on incorporating health in all policies

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 \$300,000 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.

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 2019. 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 2019.

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 2019.

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 2019.

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 2019, 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 2019, the City will continue to enhance its coordination with affordable housing providers and social service agencies through periodic meetings. These include meetings and/or discussions with the Peoria City/County Health Department, Peoria Housing Authority, Illinois Housing Development Authority (IHDA), Community Housing Development Organizations (CHDO), non-profit housing developers, for-profit affordable housing developers and social service agencies. The continued funding of CDBG public service grants and ESG funded homeless services will increase the coordination with the City and social service agencies by providing resources to programs offered by local service providers. Additionally, through the grant funding and subsequent subrecipient monitoring, the City better understands the programs offered in the community, the continued need for such programs and the crucial role service agencies play for the most vulnerable residents.

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 2019.

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 CenteringPregancy 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 will continue in 2019 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 information is needed.

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 2019.

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 2017, 2018 and 2019. The 2019 Annual Action Plan covers the third year of this three year period.

The CDBG program has no program income available at the start of the 2019 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 labeled HOME Resale and Recapture Policy (Image Sequence #1 through 4). 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 (Image Sequence #1 through 4).

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 2017 Annual Action Plan. Please refer to attachment labeled (Image Sequence #5 through 18).

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 as Image Sequence 19 through 27.

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:

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.

A system overview and workflow is attached as Image 28. 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 Advisory Commission on Human Resources (HRC) – a standing City Commission. Historically, the HRC 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 subgrantee grants are awarded 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 subgrantees reported primarily on persons served. For 2019 – 2020, 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. Sub-grantees are sent reports on the status of their grant drawdown/remaining funds and their goal performance to date.

No additional information needed.

Attachments

Citizen Participation Comments



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

Certificate of the Publisher

Gatehouse Media 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, namely one time per day for 0 successive weeks. The first publication of the notice was made in the newspaper, dated and published on April 23 2019, and the last publication of the notice was made in the newspaper dated and published on April 23 2019. 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 Gatehouse Media, its publisher, at Peoria, Illinois, on April 23 2019.

City of Peoria
Community Development Dept.
ad #4672201

By:

Doug Bigelow
Legal Notice Representative
Peoria Journal Star – Gatehouse Media

Publisher

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

Legal Notice	Legal Notice
<p>NOTICE OF PUBLIC HEARINGS AND PUBLIC COMMENT PERIOD City of Peoria, Illinois 2019 Annual Action Plan</p>	
<p>NOTICE IS HEREBY GIVEN that the City of Peoria will hold two public hearings on Tuesday, April 30 at City Hall, 419 Fulton Street, Room 404 at 8:30 AM and 5:30 PM.</p> <p>The purpose of these hearings is to obtain views and opinions from the public on the draft 2019 Annual Action Plan. The Annual Action Plan provides a concise summary of the activities that will be conducted with 2019 grant funding through the Community Development Block Grant (CDBG) program, the HOA's Investment Partnership program, and Emergency Solutions Grant (ESG).</p> <p>A 30 day public comment period must be held for comment on the Annual Action Plan. This comment period is from Wednesday, April 24 to Thursday, May 23 at 4:00 p.m.</p> <p>Draft copies of the 2019 Annual Action Plan is available for review at the following locations during regular business hours: City of Peoria City Clerk's Office, City Hall Room 401; City of Peoria Community Development Department, City Hall Room 302; and Peoria Public Library, 107 N. Monroe Street.</p> <p>A copy is also available on the City of Peoria website (www.peoriagov.org) under the Community Development Department, Grant Management Division, and then Plans.</p>	
<p>Peoria.</p> <p>Written comments should be sent to the Community Development Department, Attn: Kathryn Murphy, at 419 Fulton Street, Room 200, Peoria, IL 61614 or via email to kmurphy@peoriagov.org.</p> <p>In addition, citizens may also provide their comments during public hearings scheduled on Tuesday, April 30 at 8:30 a.m. and at 5:30 p.m. in City Hall Room 404. The public hearings are open to the public and residents are encouraged to attend. The location of the hearings are handicap accessible. Please call the number below if you need an interpreter. The Annual Action Plan is subject to amendment or approval by the City Council.</p> <p>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.</p>	

Kathryn Murphy

From: Kathryn Murphy
Sent: Tuesday, May 21, 2019 8:20 AM
To: Andres Diaz
Subject: RE: Land Transfers in the North Valley
Attachments: Revised AP-15.pdf

Good Morning Mr. Diaz,

Thank you for your comment on the 2019 Annual Action Plan. I have added the comment to the log of comments in the plan.

In addition, I edited the section of the plan regarding land donations to CHDOs to include that the policy of the City is to not transfer any land in areas where neighborhood planning efforts are ongoing until these planning efforts are completed.

If I can be of any additional assistance, please do not hesitate to contact me.

Have a wonderful day!

Thank you,
Kathryn

From: Patrick Ulrich
Sent: Thursday, May 16, 2019 1:42 PM
To: Andres Diaz <mrاندresdiaz@att.net>; Kathryn Murphy <kmurphy@peoriagov.org>
Subject: Re: Land Transfers in the North Valley

Andres

Thanks for the note. We have your email. Kathryn is in training this afternoon, but we will ensure your comments are included.

I had previously directed Community Development not to transfer any land in the North Valley until the community planning efforts were complete.

P

On May 16, 2019, at 13:12, Andres Diaz <mrاندresdiaz@att.net> wrote:

Kathryn, Patrick and Council,

I haven't received any response/acknowledgement on my original email and I want to make sure that this is included in the public comments of the City's 2019 Action Plan. I believe that when we just give away the land of the city, with no larger plan, it further drives the idea that certain areas of our city are worthless. The city council should

1

expect people to purchase land, even if it is the same value as the County Trustee charges at \$600/parcel.

Can you please confirm that this email has been received?

Council members, I truly believe that someone has to acknowledge people when they send a request or comment. Even if you just say that the message has been received, its better than not responding at all.

Thank you,

Andres Diaz
309-453-6951

On Friday, April 26, 2019, 3:31:35 PM CDT, Andres Diaz <mrandresdiaz@att.net> wrote:

Patrick and Denise,

With the purchase of the Scottish Rite per the Journal Star article (<https://www.pjstar.com/news/20190426/entrepreneur-kim-blickenstaff-buys-scottish-rite-cathedral-in-georgia>) can we please stop giving away land in the north valley? Per the 2019 Action Plan that Kathryn Murphy is putting together, CHDO's are requesting the city give them land to control their site development, but we need to make sure that we don't get in the way of private, market rate development and the opportunity for the North Valley to see a Renaissance. The continued giving away of land to CHDO development by Habitat will impede the opportunity for that to happen. I've not seen any further notice on the land I submitted an RFP on but I also know that our Community Development Department doesn't communicate very well either. Can I ask for a commitment from the city and my elected officials that we will wait until a plan comes together before any more land is transferred in the North Valley?

Thank you,

Andres Diaz
309-453-6951

Sent from my iPhone



Public Health
Prevent. Promote. Protect.
Peoria City/County
Health Department

May 16, 2019

City of Peoria
Attn: Kathryn Murphy
419 Fulton
Peoria, IL 61602

RE: Supporting CDBG Funding Allocation 2019 Annual Action Plan

To Whom It May Concern,

Please accept this letter of support from the Peoria City/County Health Department for the Community Development Block Grant (CDBG) funding allocation in the 2019 Annual Action Plan in regard to the lead match program and the reallocation of the prior year funds to the health department partnership program.

The Peoria City/County Health Department has a long partnership with the City of Peoria in supporting the needs for our families and communities; specifically, in relation to housing and human services. The funds within the 2019 Annual Action Plan will assist in continuing to improve the quality of life for the residents of our community.

The health department continues to appreciate the ability to support and work with the city in the future.

Thank you,

Monica Hendrickson, MPH
Public Health Administrator
Peoria City/County Health Department

Kathryn Murphy

From: Kathryn Murphy
Sent: Tuesday, June 04, 2019 8:16 AM
To: 'Karrie Alms'
Subject: RE: 2019 - Public Comments submitted for inclusion in the City of Peoria's 2019 Annual Action Plan DRAFT 4.23.19
Attachments: Revised AP-15.pdf

Good Morning Karrie,

Thank you again for your comments regarding the 2019 Annual Action Plan. Please see below for the response to each of your comments.

Have a wonderful day!

Thank you,
Kathryn

From: Kathryn Murphy
Sent: Thursday, May 23, 2019 10:16 AM
To: Karrie Alms <pinkthinksmarttalk@yahoo.com>
Subject: Re: 2019 - Public Comments submitted for inclusion in the City of Peoria's 2019 Annual Action Plan DRAFT 4.23.19

Karrie,

Thank you for your comments. They have been received.

Thank you,
Kathryn

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From: Karrie Alms <pinkthinksmarttalk@yahoo.com>
Sent: Thursday, May 23, 2019 9:54:39 AM
To: Kathryn Murphy
Subject: 2019 - Public Comments submitted for inclusion in the City of Peoria's 2019 Annual Action Plan DRAFT 4.23.19

Dear Kathryn:

Thank you for remembering to send the City of Peoria Annual Action Plan DRAFT 4.23.19 for possible comment. Please excuse typos. Here are my comments:

(1) Page 5 The City has a good relationship with the Peoria Housing Authority (PHA) and other assisted housing providers. Since a new executive director took over last year, the City has had regular meetings and updates on the PHA activities and future plans.

RESPONSE:

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The problem with the City of Peoria as well as the PHA is their interface with local residents and homeowners in particular. The single largest investment a person or family usually makes in their lifetime is the purchase of a home. The City and the PHA do not have a good relationship with the public. There is little if any public trust with these organizations regarding the development of affordable housing and other public issues.

The City and PHA has traditionally brought forward affordable housing plans, projects, strategies with little front loading of public input from residents and property owners in a proposed project site area. The PHA has a notoriously horrible track record with a no trespass list that has been upwards of 1,000 people and twenty-five (25) hours of patrolling services per week for all of the PHA properties. This no trespass situation has gone on for years and perhaps has changed but that has not been verified in 2019.

The process of providing decent affordable housing requires a strategy of all hands on deck. All stakeholders need to be included in the beginning planning stages of these projects in order to rationally and calmly assess and map resources and strategies for the benefit of all. The City and PHA have wasted many of the twenty-five years that I lived in Peoria because of their exclusionary planning practices. Nothing changes if nothing changes and regrettably those participants who need affordable housing and homeowners are put through as emotional and divisive process that yields nothing positive. This cycle is not limited to HUD funds as it has also repeatedly played out in our community with IHDA funding, where an application was submitted that had never been voted on by the not for profit organization and grossly and inaccurately classified neighborhood assets that did not exist. It is not clear why the City of Peoria does not take a corrective leadership role to change this dysfunctional cycle, however, this type of non-inclusive planning is destructive and counter productive to solving the affordable housing needs of our community. It is a betrayal of the public trust.

Because it is such an emotional and personal issue for those who are in need of decent affordable housing and those who perceive that a negative impact from past poor management of affordable housing is likely to occur and impact their largest investment, their home and thereby their family life, all stakeholders need to be included at the start of the planning process from the beginning to address this necessary and sensitive issue. Will it be easy? Likely not. However, our community has sadly seen the dismal results of decades of non-inclusive planning.

City Response

Thank you for your comments. The City of Peoria is dedicated to ensuring appropriate public input for all developments. The City will continue to work with the new PHA leadership to bolder past efforts.

(2) Page 5 The City has an established relationship with Habitat for Humanity, Peoria Citizens Committee for Economic Opportunity and the Peoria Opportunities Foundation, all of which are certified CHDOs.

RESPONSE:

While the City has an established relationship with these CHDOs, at a two day meeting with community participants regarding increasing various quality of life issues in the 61605 zip code, I was in the same discussion group as Patrick Urich, Peoria City Manager and had conversations about the City partnering with PCCEO and POF to increase their capacity to be eligible for more than CHDO certification, ie to be eligible for CHDO funding. It has been two or three years since that discussion occurred, it appears that CHDO funding will once again be approved for HFH in presumably the same area that several years of funding have been received to meet the HOME-CHDO 15% minimum. There is a HFH subdivision being built in Peoria's North Valley. Many community advocates in the 61605 zip code have questioned by no affordable housing has been built in the 61605 zip code by HFH and these advocates never seem to be able to get an answer. While the City purports that the CHDO activities are city-wide, the implementation and awarding of the CHDO funding does not demonstrate that scenario.

City Response

While the CHDO activities may occur City-wide, it is up to the developer to choose the location. PCCEO has received funding in the past for development on the South Side and the City continues to commit other housing resources in 61605.

(3) Pages 7 - 24 Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?

RESPONSE:

Where are organizations like neighborhood associations consulted and their input about the annual action plan sought and included?

City Response

Neighborhood Associations will be consulted in the creation of the 2020 HUD Consolidated Plan.

(4) Page 25 - 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.

Page 27 - Letters were sent to state and local agencies as well as area non-for profit organizations soliciting comments on the draft 2019 Annual Action Plan. A list of agencies and organizations contacted are included in section AP-10: Consultation.

RESPONSE:

Again, how is the consultation and input of neighborhood organizations sought and included? Please review the list included in section AP-10 which does not include any citizen groups municipalities and non-for profit organizations. There is a lack of inclusion of the stakeholders who are traditionally the most vocal (homeowners) about being excluded from the planning process and their key input is missing.

Additionally as the 30-day public comment period officially ends today (23 May 2019) at 4:30 pm, how will any meaningful public comment be processed when the person receiving the public input is out of the office until May 29th? May 29th is the day after the May 28th Peoria City Council meeting where the Annual Action Plan will be on the agenda. How does the same tired, merely check the box for public input to satisfy a requirement ever result in meaningful change for how affordable housing is developed and carried out in Peoria? It is possible that someone else is covering for the designated public comment recipient, however, how would such a designee know how to meaningfully incorporate and comment on any public comment when that is their position?

Received 23 May 2019 as an auto reply to a response to an email that I sent.

Thank you for contacting the City of Peoria Community Development Department.

I will be out of the office until Wednesday, May 29 and will respond when I return.

Thank you for your patience and have a wonderful day.

Thank you,
Kathryn

Kathryn Murphy
Senior Grants Coordinator
Community Development
City of Peoria
419 Fulton Street, Suite 300
Peoria, IL 61602
(309) 494-8607

[City Response](#)

Neighborhood Associations will be consulted in the creation of the 2020 HUD Consolidated Plan. May 23 was the deadline for comments to be submitted to the City. Comments must be responded to prior to submission to City Council and to HUD. This item is going to City Council on June 11th.

(5) Page 25 - This effort met and exceeded the requirements of the City's Citizen Participation Plan and provided meaningful input for the creation of the 2019 Annual Action Plan.
Public.

RESPONSE:

The City of Peoria Citizen Participation Plan is dated July 6, 2004 and can be found at this link http://www.peoriagov.org/content/uploads/2012/11/City-of-Peoria-Citizen-Participation-Plan_1395867122_add.pdf at the City of Peoria's website.

The Plan needs to be updated. There have been numerous occasions where residents of the North Valley have presented suggestions for development as well as had meetings to no avail. There is no level playing field as the CHDO developer has essentially been given free reign by the City of Peoria staff to disregard the original design the Near Northside National Historic District and build for the sake of building new housing. Destruction and removal of historic brick sidewalks in a National Historic District has occurred.

Concentration of affordable housing all in one area is a long term detriment to HOME-CHDO participants as well as the specific neighborhood and the City of Peoria as a whole. Said concentration can have a stigma effect for HOME-CHDO participants, the neighborhood itself and preclude the redevelopment of a mixed income neighborhood. The resale value of HOME-CHDO home in low income, CDBG only neighborhoods never seems to help people get ahead financially due to lack of property appreciation, access to opportunity, access to basic services and so on. Yes, home ownership has been achieved which is a laudable goal. Nevertheless other considerations for access to opportunity, education, basic services and so forth are essential elements for helping participants to be able to improve their lives and the lives of their children.

HOME funds are linked to the HOME participant's eligibility, not a specific geographic location within the City of Peoria. There is no local high school in the North Valley area and the students are required to attend a high school on the other end of town. Additionally, I have lived in the North Valley for twenty-five (25) years and we have yet to have a full service grocery store in this area. These are but two of the access issues presented by building in low income census tracts.

Publishing notices only in a local newspaper does not work in our day and time. If possible to add additional distribution criteria (to not be in conflict with 24 CFR Part 91)for all meeting notices, public comment periods, et al to

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include social media, email distribution to registered neighborhood associations, interested parties list and other distribution to other interested groups. The outreach for public inclusion and comment needs to be strengthened and broadened and require more than just the bare minimum.

"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." Where is the consultation by the City of Peoria with the neighborhoods and homeowners where HOME funding is generally approved or better still citywide to allow HOME-CHDO participants increased access to opportunity across many sectors to truly improve their lives and the lives of their children and generations to come? Until there is an inclusive and comprehensive approach to affordable housing development, Peoria's efforts will continue to be hampered and diminished.

The City of Peoria no longer has a Planning and Growth Management Department. The City should be required to change this document to refelect the correct name which appears to be the Community Development Department.

City Response

As part of the 2020 Consolidated Plan process, the citizen participation plan will be updated.

(6) Page 31 - The City 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 in program year 2019, the City will donate property to a CHDO for in-fill, new construction of single family homes. As organizations approach the City for applications for state or federal tax credits, the City works with the developers to identify potential Cityowned lots that could be donated to the project. In addition to CHDO projects, the City conducts a rehab program for City-owned properties the abandoned property process via demolition court. The program allows qualified individuals, neighborhood association, nonprofits or 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.

RESPONSE:

While this may have been true in the past, the CHDO in the North Valley has purchased property for \$5,000 in 2017 (1013, 1015 and 1019 NE Madison) as well as submitted a RFP response for \$1,800 for a lot in the 602 of Evans Street, a 0.05 acre lot.

No vacant lots should be solely set aside for a CHDO or any other developer. There should be a competitive RFP process to attract a variety of

developers, including private developers to reweave the fabric of this urban neighborhood.

Additionally, no city owned property should be transferred prior to a robust redevelopment plan can be developed from the heart of the North Valley with multiple opportunities for engagement and feedback rather than the current attempt to develop a plan based on an IDHA survey which was a poor attempt at planning.

City Response

Thank you for your comment. The City received an additional comment regarding this section. This section was updated to reflect the City's policy that where neighborhood planning efforts are occurring, no land will be donated until these planning processes are completed. Attached is the updated section reflecting these changes.

(7) Page 35 - 4 Goal Name CHDO Set Aside Goal Description This goal is to create housing units for low income eligible households using no less than 15% of HOME funds from the 2018 allocation. This goal will be associated with activities completed only by certified Community Housing Development Organizations (CHDO). The City will certify an organization's CHDO status prior to committing any HOME funds under this goal/activity. The activity is city-wide, but will be prioritized for 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).

RESPONSE:

Not sure how the City is able to claim that "the activity is city-wide" when the CHDO, the only CHDO that receives City of Peoria HOME-CHDO funding has publicly identified that the North Valley is the sole area that they will be building with these funds in the City of Peoria. Please refer to my previous comments about building in the 61605 zip code.

Again where is the access to opportunity for HOME-CHDO participants as previously discussed?

City Response

While the CHDO activities may occur City-wide, it is up to the CHDO developer to choose the location.

(8) Page 41 - Project Name CHDO Target Area Goals Supported CHDO Set Aside Needs Addressed Affordable Housing - New construction Funding HOME: \$110,000 Description This project is to create housing units for low-income eligible households by certified Community Housing Development Organizations (CHDO). Target Date Estimate the number and type of families that will benefit from the proposed activities Approximately 1 low income family will be assisted through this project. Location Description city-wide Planned Activities This project is to create housing units for low income eligible households by certified Community Housing Development Organizations (CHDO).

RESPONSE:

Looks good on paper that "Location Description city-wide Planned Activities" ... that is not the reality of the situation. For the past several years of HOME-CHDO funding, the City of Peoria has awarded funding to the same CHDO who has built out a subdivision in the North Valley.

(9) The requirement for CHDOs to have a process whereby CHDO participants can have more robust input needs to be explored. In speaking with participants who want to own a home, they are interested but necessarily in living in the North Valley and that is the only option that is available to them.

City Response

The City will continue to monitor the input process outlined in the CHDO application for the CHDO developers.

(10) Concentration of funding in low income neighborhoods continues to place low income participants in food deserts, lack of access to opportunity, access to educational opportunities and so on.

City Response

While the CHDO activities may occur City-wide, it is up to the CHDO developer to choose the location. However, it is a position of the City that investing in older neighborhoods can create areas of opportunity.

(11) Time does not allow for additional comments as I have other appointments and the deadline is 4:30 pm May 23, 2019.

City Response

Thank you for your comments.

Thank you for this opportunity to provide public comments.

Sincerely,

Karrie E. Alms
1005 NE Perry Avenue
Peoria, IL 61603

Grantee Unique Appendices

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 x 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

City of Peoria – Emergency Solutions Grant (ESG)
Policies and Procedures
Revised October 2013

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Annual Action Plan
2019

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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 (HOIHCOG).

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 (HOIHCOG) HMIS system in accordance with HUD rules, operating standards set by the HOIHCOG 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 HOIHCOG 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

*City of Peoria – Emergency Solutions Grant (ESG)
Policies and Procedures
Revised October 2013*

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- o Case Management
- o Housing Search and Placement

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

V. PROCEDURAL GUIDELINES FOR ESG ASSISTANCE

- o The HOIHCOG ESG provider agencies will only provide assistance to households residing in, homeless within or moving to Peoria, Tazewell, Woodford, and Fulton Counties.
- o 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.
- o 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.
- o 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.
- o 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.
- o 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.
- o 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.
- o 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.
- o 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

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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:

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- 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

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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:

- o Comply with federal, state and local confidentiality laws
- o Comply with limits on data collection (relevant, appropriate, lawful and specified in privacy notice)
- o Have a written policy and post it on agency website
- o 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

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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.

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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

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- 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

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- 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.

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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's CoC grant manager and the CoC director with regard to eligibility and documentation for paragraph (4). No other paragraphs of the homeless definition

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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.

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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

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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.

Adopted March 28, 2018

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