



**City of Springfield Illinois
HOME-ARP Allocation Plan
Draft
as of
February 10, 2023**

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Executive Summary

The City of Springfield will receive an allocation of \$2,380,397 of HOME – American Rescue Plan (“HOME-ARP”) appropriated under section 3205 of the American Rescue Plan Act of 2021 (P.L. 117-2). The purpose of the funds is to address the needs of households experiencing homelessness and other households that face housing instability. The City may use the funds for a limited number of eligible activities, including the development and support of affordable housing, tenant-based rental assistance (TBRA), the provision of supportive services, and the acquisition and development of non-congregate shelter units. A portion of the funding can be used for administrative and planning purposes and the support of local non-profit stakeholders.

The funding is administered by the U.S. Department of Housing and Urban Development (HUD). HUD requires the City to conduct a planning process and submit the information in this document in order to qualify for its HOME-ARP funding. All guidance in this template, including questions and tables, reflect requirements for the HOME-ARP allocation plan, as described in Notice CPD-21-10: *Requirements of the Use of Funds in the HOME-American Rescue Plan Program*.

The City encourages public input on the proposed use of HOME-ARP funds described in this document. Public comments can be submitted a number of ways:

- Via email to info.OPED@springfield.il.us .

Via the website posting of this document at: <https://www.springfield.il.us/PublicComments.aspx>

- Via US Mail to:

Office of Planning & Economic Development
ATTN: HOME ARP Comments
800 E. Monroe, Suite 107
Springfield, IL 62701

The City will consider all comments received before 4:30 PM on March 10, 2023, before submitting the proposal to HUD. All accepted comments and the City’s responses will be included in the final submission to HUD. The City will continue to accept comments from the public after its submittal and use public comments to guide and inform possible future amendments. The City will also conduct a public hearing on the proposed use of HOME-ARP funds on March 13, 2023 at 5:30 in the third floor Council Chambers of Municipal Building-West. The City of Springfield Council Chambers are accessible to persons with physical disabilities. If special arrangements need to be made to accommodate citizens in order for them to participate in the public hearing, please call the Office of Planning and Economic Development, at (217) 789-2377 to make those arrangements, or for the hearing impaired call City Clerk at (217)789-2216.

Consultation

In accordance with Section V.A of the Notice (page 13), before developing its HOME-ARP allocation plan, at a minimum, a PJ must consult with:

- CoC(s) serving the jurisdiction's geographic area,
- homeless service providers,
- domestic violence service providers,
- veterans' groups,
- public housing agencies (PHAs),
- public agencies that address the needs of the qualifying populations, and
- public or private organizations that address fair housing, civil rights, and the needs of persons with disabilities.

State PJs are not required to consult with every PHA or CoC within the state's boundaries; however, local PJs must consult with all PHAs (including statewide or regional PHAs) and CoCs serving the jurisdiction.

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

Beginning in 2021, the City of Springfield, Sangamon County, and the Heartland Continuum of Care led a strategic planning process to map out a path to address the growing issue of homelessness in their jurisdictions. The process resulted in the "[Springfield & Sangamon County 2022-2028 Strategic Plan to Address Homelessness](#)".

The process included four community summits where more than one hundred residents participated. The process also included discussions with agencies striving to protect the most vulnerable members of the community and end their homelessness. Key partners included the Springfield Urban League, the Springfield Project, Memorial Health, St. John's Hospital, SIU School of Medicine, Springfield Housing Authority, United Way of Central Illinois, Lathan Harris, and the Community Foundation for the Land of Lincoln. Several homeless service providers participated, including MERCY Communities, Springfield Black Chamber of Commerce, Helping Hands, Hospital Sisters Health Systems, among others.

This planning process and resulting plan served as a starting point for the HOME-ARP planning process. On December 15, 2022, the City held a focus group with eighteen local public agencies and service providers to gather input on the use of HOME-ARP funds. A list of the organizations that participated is included below. During the focus group, the City provided a brief summary of the HOME-ARP program and the Heartland Continuum of Care presented information from the strategic plan and information regarding homelessness from the most recent Point in Time Count. The City conducted follow up outreach to agencies in January and February, including Springfield Housing Authority and Sojourn Shelter. A summary of the feedback received through the consultation process is included below.

List the organizations consulted:

Agency/Org Consulted	Type of Agency/Org	Method of Consultation	Feedback
Springfield Housing Authority	Public Housing Authority	Email, Phone	See below
Heartland Continuum of Care	Continuum of Care	Email, Phone, Focus Group	See below
The Salvation Army	Homeless Service Provider	Focus Group	See below
Helping Hands of Springfield	Homeless Service Provider	Focus Group	See below
Lincoln Land Community College	Public Agency, Higher Education	Focus Group	See below
Illinois State Board of Education	Public Agency	Focus Group	See below
Habitat for Humanity	Affordable Housing Developer	Focus Group	See below
Heartland Housed	Homeless Service Provider	Focus Group	See below
Land of Lincoln Legal Aid	Fair Housing, Civil Rights organization	Focus Group	See below
The Springfield Project	Social Service Agency	Focus Group	See below
MERCY Communities	Homeless Service Provider	Focus Group	See below
Youth Service Bureau	Homeless Service Provider	Focus Group	See below
Community Health at Memorial	Homeless Service Provider	Focus Group	See below
Contact Ministries	Homeless Service Provider	Focus Group	See below
St. John’s Hospital	Homeless Service Provider	Focus Group	See below
Springfield Vet Center	Veterans advocate	Focus Group	See below
Fifth St Renaissance	Homeless Service Provider, Veterans	Focus Group	See below
Sojourn Shelter	Domestic Violence service provider	Focus Group, Email	See below
Springfield Police Department	Public Agency	Focus Group	See below

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

To begin the focus group, the Heartland Continuum of Care reviewed the findings from the recently completed Heartland Housed Strategic Plan. The following is a summary of the feedback received during the focus group.

- In general, there was several participants who voiced support for the strategies outlined in the Heartland Housed Strategic Plan, especially for an increase in the number of housing units available for persons trying to exit homelessness. Some service providers expressed that clients are frustrated when approached through outreach only to be put on a waiting list.
- Several participants voiced support for a housing first model supported by wrap around services. By ensuring a base level of housing stability, clients can address other factors that may be contributing to instability. For households that are at-risk of homelessness, housing stability can help the client by avoiding time consuming tasks such as going to court and searching for new housing and instead focus on employment.
- Supportive services, or wrap-around services, are needed to ensure the client is stably housed by the time housing assistance ends.
- Service providers working with eviction programs that serve households with high levels of instability and are at-risk of homelessness found that programs such as ERAP were very effective at keeping persons in their homes and avoiding homelessness. By preventing the eviction, the household will have a much better opportunity to find their next unit as the landlord will view the eviction very unfavorably.
- Service providers working with at-risk populations cited an increased need for prevention, noting that programs were running out of funding due to increased demand, reduced levels of state and federal funding, and a spike in persons experiencing homelessness for the first time.
- One service provider cited a growing need for homeless youth and persons who age out of foster care. Their program caseload has doubled. They have also seen an increase in the needs of families who lose custody of their children due to housing instability and homelessness.
- A local community college cited the need to be proactive to approach their students who were suffering from housing instability since there was a stigma in asking for help.
- There is a continuing need for day services for persons living on the streets.

Public Participation

In accordance with Section V.B of the Notice (page 13), PJs must provide for and encourage citizen participation in the development of the HOME-ARP allocation plan. Before submission of the plan, PJs must provide residents with reasonable notice and an opportunity to comment on the proposed HOME-ARP allocation plan of **no less than 15 calendar days**. The PJ must follow its adopted requirements for “reasonable notice and an opportunity to comment” for plan amendments in its current citizen participation plan. In addition, PJs must hold **at least one public hearing** during the development of the HOME-ARP allocation plan and prior to submission.

PJs are required to make the following information available to the public:

- The amount of HOME-ARP the PJ will receive, and
- The range of activities the PJ may undertake.

Throughout the HOME-ARP allocation plan public participation process, the PJ must follow its applicable fair housing and civil rights requirements and procedures for effective communication, accessibility, and reasonable accommodation for persons with disabilities and providing meaningful access to participation by limited English proficient (LEP) residents that are in its current citizen participation plan as required by 24 CFR 91.105 and 91.115.

Describe the public participation process, including information about and the dates of the public comment period and public hearing(s) held during the development of the plan:

- ***Date(s) of public notice: 2/10/2023***
- ***Public comment period: start date – 2/17/2023 end date – 3/10/2023***
- ***Date(s) of public hearing: 3/13/2023***

Describe the public participation process:

In addition to the consultation process, the City followed a modified public participation process, including public notice announcing the availability of the plan for review, a public comment period, and a public hearing.

The public notice was published on the City’s website and in The State Journal Register Times on February 10th. The City also release a press release and sent a notice to organizations that had participated in the consultation process.

Describe efforts to broaden public participation:

With the exception of allowing for a shorter public comment period provided for the HOME-ARP substantial amendment, the City will follow its adopted Citizen Participation Plan that includes efforts to broaden participation. This includes publication of the draft plan for comment, direct outreach to interested community partners, the issuance of a press release,

and issuance of announcements on social media outlets. The City will provide for accessibility to persons with disabilities by holding public hearings at ADA accessible locations. Provision for reasonable accommodations will be made when requests are made at least five working days prior to a hearing. The City will also provide translation for persons with limited English proficiency when requests are made at least five working days prior to a hearing.

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

The City will summarize comments and recommendations as it receives them. No comments received to date.

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

The City will summarize comments and recommendations as it receives them. No comments received to date.

Needs Assessment and Gaps Analysis

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

Housing Needs Inventory and Gap Analysis Table

Non-Homeless			
	Current Inventory	Level of Need	Gap Analysis
	# of Units	# of Households	# of Households
Total Rental Units	19,670		
Rental Units Affordable to HH at 30% AMI (At-Risk of Homelessness)	2,155		
Rental Units Affordable to HH at 50% AMI (Other Populations)	8,080		
0%-30% AMI Renter HH w/ 1 or more severe housing problems (At-Risk of Homelessness)		4,100	
30%-50% AMI Renter HH w/ 1 or more severe housing problems (Other Populations)		680	
Current Gaps			4,780

Data Sources: 2015-2019 Comprehensive Housing Affordability Strategy (CHAS)

Homeless Needs Inventory and Gap Analysis Table

Homeless													
	Current Inventory*					Homeless Population				Gap Analysis			
	Family		Adults Only		Vets	Family HH (at least 1 child)	Adult HH (w/o child)	Vets	Victims of DV	Family		Adults Only	
	# of Beds	# of Units	# of Beds	# of Units	# of Beds					# of Beds	# of Units	# of Beds	# of Units
Emergency Shelter	25	9	152	152	0								
Transitional Housing	121	35	26	26	16								
Permanent Supportive Housing	69	20	57	57	59								
Other Permanent Housing**	2	#	20	#	5								
Sheltered Homeless						25	162	2	19				
Unsheltered Homeless						0	26	2	0				
Current Gap										0	0	0	0

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

* Does not include beds for youth, including 11 Emergency Shelter, 3 Transitional, and 18 Rehousing.

** Other Permanent Housing includes units funded through rapid rehousing

Qualifying Populations

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

HOMELESS

as defined in 24 CFR 91.5

Two hundred sixty-four individuals were counted in the 2022 Point in Time count. Of these, 143 were housed in Emergency Shelters, 95 were in transitional housing, and twenty six were unsheltered. Unsheltered individuals include those living on the streets, in vehicles, and in encampments.

Within this population of people experiencing homelessness, 109 female (21%), 152 male (58%), and 3 transgender (1%). 139 individuals were African American (53%), 106 were White (40%), 12 were multiple races (5%), 6 were American Indian, Alaska Native, or Indigenous (2%), and 1 was Asian.

Fifty-one chronically homeless individuals were part of this count (19%), 45 of whom were in emergency shelter and 6 were unsheltered.

Fifty individuals were under the age of 18 (19%), 33 were between the ages of 18 to 24 (13%), and 181 were over the age of 24 (69%). Of the youth population (24 or younger), 29 were unaccompanied, all of whom were over the age of 18. Seven of these unaccompanied youth were chronically homeless.

Seventy six individuals were in households with both an adult and children (29%), including all 50 children in the count. These 76 individuals comprised of 25 households.

Additional characteristics of the homeless persons included the following:

- Seventy-six individuals had a series mental illness (29%). Of these, fifty-five persons were in emergency shelter, 17 were in transitional housing, and 4 were unsheltered.
- Fifty-four persons had a substance use disorder (20%). Of these, thirty-five individuals were living in emergency shelter, 15 in transitional housing, and 4 were unsheltered.
- Twenty-three individuals were veterans (9%). Of these, twenty one persons were in Emergency Shelter and two were unsheltered.
- Nineteen individuals were adult survivors of domestic violence. Of these, nine persons were living in Emergency Shelter and ten were in transitional housing.
- Three individuals were adults with HIV/AIDS, all of whom were in transitional housing.

At Risk of Homelessness

as defined in 24 CFR 91.5

HUD's Comprehensive Housing Affordability Strategy (CHAS) data for the City of Springfield demonstrates there are 4,100 renter households below 30% AMI with a severe cost burden, meaning that more than half of their income is used to pay for housing costs.

In 2022, 320 individuals representing 164 households were served through Homelessness Prevention efforts connected to the Heartland Continuum of Care's Homeless Management Information System. 217 of those served were over the age of 18. 230 (72%) were Black, African American, or African, 86 (27%) were White, 2 (less than 1%) were Native Hawaiian or Pacific Islander, 1 (less than 1%) was American Indian, Alaska Native, or Indigenous, and 1 (less than 1%) was Asian or Asian American.

During the consultation process, social service agencies that provide homeless prevention assistance and eviction services noted demand for these types of services did not decline as expected after the COVID-19 pandemic closures had ended.

Representatives from the local school district noted that 132 children attending Springfield schools qualified for homeless services. Depending on their household income, these families may qualify as at-risk.

Domestic Violence

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

County level domestic crime data from the Illinois Uniform Crime Reports indicate that in 2020 (the most recent year available), Sangamon County had 5,162 domestic offenses reported compared to 4,507 in 2019. There were no Human Trafficking reports in the county in 2019 or 2020.

Sojourn Shelter provides services and shelter to victims of domestic violence in Springfield and the surrounding area. Sojourn reported that they served 1,905 (1,803 adults and 102 children) survivors of domestic violence. This included 7,457 safe nights of shelter to 291 survivors (210 adults and 81 children). The agency received 2,933 emergency hotline calls and assisted 2,452 survivors with 2,499 orders of protection.

Other Populations

Including those requiring services or housing assistance to prevent homelessness and other populations at greatest risk of housing instability, as defined by HUD in the Notice.

HUD guidance includes a number of households under its definition of Other Populations. Specifically, these households include formerly homeless households who may need additional assistance to avoid a return to homelessness; extremely-low income households

(earning less than 30% of the area median income) that experience a severe cost burden (i.e. pays more than 50% of monthly household income toward housing); and extremely-low and low-income households (earning less than 50% of the area median income) that also meet one of the qualifications of “at-risk of homelessness”.

There is most certainly some overlap between this qualifying population and households that also meet the definition of at-risk of homelessness. However, this category also includes households earning between 30 and 50% of area median income. According to the most recent CHAS data set, there are an additional 2,675 households in this income range that have a cost burden. Of those, 680 households have a severe cost burden.

During the consultation, some service providers expressed a greater need to provide wrap-around services for formerly homeless households to prevent a return to homelessness. Specifically, employment-related services including job training, child care, and transportation were mentioned.

Current Resources

Identify and consider the current resources available to assist qualifying populations, including congregate and non-congregate shelter units, supportive services, TBRA, and affordable and permanent supportive rental housing.

The Heartland Continuum of Care’s Housing Inventory Count conducted at the same time as the annual Point in Time Count demonstrated adequate aggregate amounts of emergency shelter and transitional housing beds with vacancies in each of these programs.

A new Emergency Shelter complex was recently announced with an anticipated Fall 2023 opening that will accommodate low barrier shelter and day services for men and women over the age of 18.

The local continuum has a total of 148 beds in permanent supportive housing (PSH). Of those, 86 are designated “Adult-Only” while 62 beds in 20 units are for families. The local continuum has resources for a small rehousing program that funded 45 beds, according to the 2022 Housing Inventory report.

Unmet Needs

Describe the unmet housing and service needs of qualifying populations.

Homeless

as defined in 24 CFR 91.5

In a given year, 1,142 persons in the homeless system of care. There are currently only 230 units of permanent supportive housing. This includes 148 units in PSH, 45 units of rehousing, and 37 units of “other permanent housing”, according to the 2022 Housing

Inventory Report. According to the consultation with the local continuum of care, only sixteen percent of persons living outside or in shelters get access to housing opportunities with supports.

Analysis completed as part of a community wide strategic planning process found that each year the number of people experiencing homelessness beyond current housing opportunities grows by 155 people. Of the households assessed, more than half (56%) would benefit from permanent supportive housing while 38% need rapid rehousing. Projected community needs between 2023 and 2028 indicate that 400 new Permanent Supportive Housing opportunities and 365 Rapid Rehousing opportunities need to be created in Springfield and Sangamon County.

At the time of the Heartland Continuum of Care's Housing Inventory Count, all 45 Rapid Rehousing opportunities for single adult and family households were full and only 23 Permanent Supportive Housing opportunities for single adult households were available. Of those 23 opportunities, 18 were Emergency Housing Vouchers that were in the process of being filled. At the same time, the Heartland Continuum of Care's Coordinated Entry list in February of 2022 had 96 households prioritized for Rapid Rehousing and 135 households prioritized for Permanent Supportive Housing. Of those 135 households eligible for Permanent Supportive Housing, 18 were families.

As indicated in Springfield and Sangamon County's 2022-2028 Strategic Plan to Address Homelessness, creating housing opportunities, including case management and supportive services, is a critical component to addressing homelessness more effectively. Prioritizing Permanent Supportive Housing opportunities for individuals who have experienced unsheltered homelessness would address a critical gap in our community's current system. Additional Outreach services would be an important component of addressing the initial service needs of unsheltered and sheltered individuals while connecting them to Tenant Based Rental Assistance and appropriate case management. As a part of the data gathering the CoC is currently gathering information on the homeless population place of origin. In addition, the Salvation Army low-barrier, overflow shelter will be supplanted by the proposed Helping Hands 24/7 homeless service center.

At Risk of Homelessness
as defined in 24 CFR 91.5

According to ACS statistics utilized for the City of Springfield's 2020 - 2024 Consolidated Plan, there are 2,155 affordable rental units for households at or below 30% median family income. HUD's Comprehensive Housing Affordability Strategy data for the City of Springfield demonstrates there are 4,100 renter households below 30% AMI with a severe cost burden (i.e. paying more than half of their income for housing costs). All of these households would benefit from financial assistance. Workforce development and additional

support connecting people to family and social services they are eligible for would help to create housing stability for this population.

Young adults aging out of foster care also qualify as at-risk of homelessness. During the consultation process, one service provider indicated that this population was growing and additional resources were needed to meet their needs. Caseloads for their organization doubled during the pandemic and has not subsided.

Domestic Violence

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

Sojourn Shelter is the only secure, dedicated and certified domestic violence shelter in a five county area of Central Illinois serving Sangamon, Christian, Logan, Menard and Montgomery Counties. If Sojourn is unable to accommodate a client due to the shelter being full, the agency works closely with other shelters that would be able to accommodate the client until an opening becomes available. As a last resort, assistance with a hotel accommodation can often be secured. Additional opportunities to connect households impacted by domestic violence, sexual assault, stalking, or human trafficking to rental assistance and supportive services would allow those households to safely enter stable housing and spend less time in Emergency Shelter.

Other Populations

Including those requiring services or housing assistance to prevent homelessness and other populations at greatest risk of housing instability as defined by HUD in the Notice.

Many of the households that qualify under the “Other Populations” criteria will also qualify under the “At-Risk of Homelessness” category. In addition to the populations already discussed, there are an additional 680 renter households earning between 30 and 50% of the area median income that pay more than half of their income for housing.

In response to the COVID-19 pandemic, more resources for rental and utility assistance were made available for this income segment. As those funding sources have been expended, there are less supports available in the community to assist with rental affordability for this population. Tenant based rental assistance, access to workforce development and additional support connecting people to social services they are eligible for would help to create housing stability for this population. In consultations, social service agencies described the huge benefit of short-term financial assistance to help avoid eviction and homelessness. By preventing the eviction, the household will be able to more easily secure rental housing in the future without the eviction on their record. The time saved by not having to attend court proceedings and secure new living arrangements can be used for employment that will help ensure the household remains stably housed.

Gaps

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

As demonstrated in Springfield and Sangamon County's Strategic Plan to address homelessness and evidenced by utilization rates provided, the largest gaps for homeless and at-risk of homeless households in our community are in the need for Permanent Supportive Housing and Rapid Rehousing for single person households. An expansion of these programs to serve those deemed most in need of housing through the Heartland Continuum of Care's Coordinated Entry System could be accomplished through tenant based rental assistance coupled with funding for case management and supportive services.

Due to a prolonged period of inadequate Permanent Supportive Housing Supply, Springfield experiences an increased number of households experiencing chronic homelessness. The strategic plan also highlighted the need for non-congregant, bridge housing for individuals leaving hospitals and other systems. Public comments have highlighted the need for an increase in community based, outreach workers to help connect people with shelters and other services.

In terms of "Other Populations" that are not traditionally served through the Continuum's Coordinated Entry process, the most pressing needs include financial assistance to help the household achieve short term housing stability, coupled with wrap around services such as case management and employment-related supports to achieve more lasting stability.

Identifying characteristics of Other Populations

Under Section IV.4.2.ii.G of the HOME-ARP Notice, a PJ may provide additional characteristics associated with instability and increased risk of homelessness in their HOME-ARP allocation plan. These characteristics will further refine the definition of "other populations" that are "At Greatest Risk of Housing Instability," as established in the HOME-ARP Notice. If including these characteristics, identify them here:

HUD guidance currently defines two criteria for households "At Greatest Risk of Housing Instability". The first criteria includes extremely-low income households (earning less than 30% of the area median income) that experience a severe cost burden (i.e. pays more than 50% of monthly household income toward housing). The second criteria include extremely-low and low-income households (earning less than 50% of the area median income) and meets one of the qualifications of "at-risk of homelessness" or otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness.

The City did not identify any characteristics other than those already addressed by the HUD guidance.

Priority Needs

Identify priority needs for qualifying populations.

As outlined in the recent Strategic Plan to Address Homelessness, the overall stated goal of the plan is to establish a system that ensures everyone who becomes homeless is re-housed in safe and suitable housing within 30 days.

To realize this, the organizations will pursue four strategies:

1. Create 765 units of safe housing affordable to persons who experience homelessness. This includes 160 units of short-term (one year or less) rehousing, 205 units of long-term (up to two years) rehousing, and 400 units of permanent supportive housing.
2. Help those living outside access the help they need and support programs that are most effective at ending homelessness.
3. Partner with healthcare, public safety, and workforce partners to help people experiencing homelessness access resources they need.
4. Improve the collection and use of information regarding homelessness and ensure those with lived experience play a lead role in efforts to address homelessness.

The plan also identified contributing factors to homelessness. These include an overall lack of affordable rental housing, physical and behavioral health challenges, domestic violence, lack of income or financial emergencies, and past evictions or criminal records. Based on the consultations with homeless prevention providers, the priority needs for “Other Populations” who are unstably housing include addressing these contributing factors before a household becomes homeless.

Determination of Needs

Explain how the PJ determined the level of need and gaps in the PJ’s shelter and housing inventory and service delivery systems based on the data presented in the plan:

The City relied on the data and insights provided in the 2022 Strategic Plan to Address Homelessness and the additional consultation conducted specifically for the HOME-ARP planning process to determine the levels of need and gaps in the current housing and service delivery system. Both of these processes were informed by a number of information sources, including

- the Point in Time Counts and Housing Inventory Counts conducted by the Heartland Continuum of Care and its member organizations;
- the perspective of the Heartland Continuum of Care, its member organizations, and other local service agencies of working with the qualifying populations on an on-going basis; and
- data from the City’s 2020 Consolidated Plan and the 2015-2019 Community Housing Affordability Strategy (CHAS) data set from HUD.

HOME-ARP Activities

Project Selection Process

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

Once the Allocation Plan is approved, the City will conduct a Request for Proposals (RFP) from local service providers to administer programs and projects that address the priority needs outlined in the Allocation Plan for qualifying populations. The City will create an application for developers interested using HOME-ARP funds for the development of affordable housing for qualifying populations.

City-Administered Projects

Describe whether the PJ will administer eligible activities directly:

The City does not expect to administer any of the HOME-ARP projects directly. The City may use a portion of the HOME-ARP funds for administration purposes to support the planning and reporting requirements associated with the funding.

Pre-Award Activities

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

The City worked closely with a number of local service providers through the consultation process in order to develop the HOME ARP Allocation Plan, including the local Continuum of Care. The City also used the services of a grants management consultant, Usona Development LLC, to draft the plan. However, no HOME-ARP funds were used for the development of the plan. None of the local service providers were reimbursed or paid for their contribution to the allocation plan. The grants management consultant was paid for using an existing contract funded from Community Development Block Grant (CDBG) funds.

In accordance with Section V.C.2. of the Notice (page 4), PJs must indicate the amount of HOME-ARP funding that is planned for each eligible HOME-ARP activity type and demonstrate that any planned funding for nonprofit organization operating assistance, nonprofit capacity building, and administrative costs is within HOME-ARP limits.

Use of HOME-ARP Funding

	Funding Amount	%	Statutory Limit
Supportive Services	\$ 700,397	29%	
Acquisition & Development Non-Congregate Shelters	\$ 0	0%	
Tenant Based Rental Assistance (TBRA)	\$ 1,000,000	42%	
Development of Affordable Rental Housing	\$ 300,000	13%	
Non-Profit Operating	\$ 115,000	5 %	5%
Non-Profit Capacity Building	\$ 115,000	5 %	5%
Administration and Planning	\$ 150,000	6 %	15%
Total HOME ARP Allocation	\$ 2,380,397		

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

In the consultation process, the primary need conveyed was to increase the availability of units accessible to persons experiencing homelessness. To ensure clients who obtain housing have an increased chance of success in obtaining stable, permanent housing, the housing must be paired with wrap-around services. There is also a need to continue to provide day services to persons living on the streets.

The City feels a portion of the funding that can be used to prevent homelessness in the first place provides additional benefits of avoiding eviction and preventing additional persons from entering the system of care.

The Continuum of Care and its members have expressed a need to increase coordination to fully utilize available resources. Planning, Non-Profit Operating Support, and Non-Profit Capacity Building monies will be used to support planning and coordination of HOME-ARP programs with other resources and to attract additional funding and build community support for new programs.

The City has not allocated any funding to non-congregate shelter as it is expected that a recent \$5 million investment from Sangamon County into the development of a new facility will meet the current level of need.

Rationale for Funding Decisions

Describe how the characteristics of the shelter and housing inventory, service delivery system, and the needs identified in the gap analysis provided a rationale for the plan to fund eligible activities:

The general consensus among the agencies involved in the consultation process indicated that a lack of affordable housing was the largest gap in the current service delivery system. Outreach workers expressed that clients would lose trust in the system when housing was not readily available and they remained on the wait list for extended period of time. Long wait list times is a direct consequence of the shortage of available units.

This sentiment is echoed in the Homeless Strategic Plan, which proposed the addition of 765 new housing units to meet the growing need of homelessness and bring the City’s homeless population to "functional zero". Functional zero means that any household that loses their housing could be rehoused within 30 days.

The overall housing goal in the Strategic Plan includes 160 short-term rehousing units, 205 long-term rehousing units, and 400 permanent supportive housing units. For the purpose of this discussion, short-term rehousing are units that provide assistance for less than one year and long-term rehousing are units that provide assistance for longer than one year but not longer than two years.

HOME-ARP Production Housing Goals

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

The City proposes to fund a combination of new rental housing development and tenant-based rental assistance with the primary focus on tenant-based rental assistance. HOME-ARP housing goal includes 160 short-term rehousing units and 15 long-term rehousing through tenant-based rental assistance. For the purpose of this plan, short-term rehousing refers to assistance for less than 12 months and long-term rehousing refers to between 12 and 24 months. The City is estimating an additional 6 units of new affordable rental housing units. These goals are based on the following assumptions:

- TBRA: \$700 of rental assistance for an average duration of 8 months for short-term rental assistance and 18 months for long term-rental assistance.
- Rental Housing: \$50,000 average subsidy per unit.

Describe the specific affordable rental housing production goal that the PJ hopes to achieve and describe how the production goal will address the PJ’s priority needs:

1. Short Term Rehousing/TBRA: 160 units
2. Long Term Rehousing/TBRA: 15 units
3. New Rental Units: 6 units

Preferences

A preference provides a priority for the selection of applicants who fall into a specific QP or category (e.g., elderly or persons with disabilities) within a QP (i.e., subpopulation) to receive assistance. A *preference* permits an eligible applicant that qualifies for a PJ-adopted preference to be selected for HOME-ARP assistance before another eligible applicant that does not qualify for a preference. A *method of prioritization* is the process by which a PJ determines how two or more eligible applicants qualifying for the same or different preferences are selected for HOME-ARP assistance. For example, in a project with a preference for chronically homeless, all eligible QP applicants are selected in chronological order for a HOME-ARP rental project except that eligible QP applicants that qualify for the preference of chronically homeless are selected for occupancy based on length of time they have been homeless before eligible QP applicants who do not qualify for the preference of chronically homeless.

Please note that HUD has also described a method of prioritization in other HUD guidance. Section I.C.4 of Notice CPD-17-01 describes Prioritization in CoC CE as follows:

“Prioritization. In the context of the coordinated entry process, HUD uses the term “Prioritization” to refer to the coordinated entry-specific process by which all persons in need of assistance who use coordinated entry are ranked in order of priority. The coordinated entry prioritization policies are established by the CoC with input from all community stakeholders and must ensure that ESG projects are able to serve clients in accordance with written standards that are established under 24 CFR 576.400(e). In addition, the coordinated entry process must, to the maximum extent feasible, ensure that people with more severe service needs and levels of vulnerability are prioritized for housing and homeless assistance before those with less severe service needs and lower levels of vulnerability. Regardless of how prioritization decisions are implemented, the prioritization process must follow the requirements in Section II.B.3. and Section I.D. of this Notice.”

If a PJ is using a CE that has a method of prioritization described in CPD-17-01, then a PJ has preferences and a method of prioritizing those preferences. These must be described in the HOME-ARP allocation plan in order to comply with the requirements of Section IV.C.2 (page 10) of the HOME-ARP Notice.

In accordance with Section V.C.4 of the Notice (page 15), the HOME-ARP allocation plan must identify whether the PJ intends to give a preference to one or more qualifying populations or a subpopulation within one or more qualifying populations for any eligible activity or project.

- Preferences cannot violate any applicable fair housing, civil rights, and nondiscrimination requirements, including but not limited to those requirements listed in 24 CFR 5.105(a).
- The PJ must comply with all applicable nondiscrimination and equal opportunity laws and requirements listed in 24 CFR 5.105(a) and any other applicable fair housing and

civil rights laws and requirements when establishing preferences or methods of prioritization.

While PJs are not required to describe specific projects in its HOME-ARP allocation plan to which the preferences will apply, the PJ must describe the planned use of any preferences in its HOME-ARP allocation plan. This requirement also applies if the PJ intends to commit HOME-ARP funds to projects that will utilize preferences or limitations to comply with restrictive eligibility requirements of another project funding source. **If a PJ fails to describe preferences or limitations in its plan, it cannot commit HOME-ARP funds to a project that will implement a preference or limitation until the PJ amends its HOME-ARP allocation plan. For HOME-ARP rental housing projects, Section VI.B.20.a.iii of the HOME-ARP Notice (page 36) states that owners may only limit eligibility or give a preference to a particular qualifying population or segment of the qualifying population if the limitation or preference is described in the PJ's HOME-ARP allocation plan.** Adding a preference or limitation not previously described in the plan requires a substantial amendment and a public comment period in accordance with Section V.C.6 of the Notice (page 16).

Identified Preferences

Identify whether the PJ intends to give preference to one or more qualifying populations or a subpopulation within one or more qualifying populations for any eligible activity or project:

The City will not provide a preference amongst any of the qualified populations.

Rationale for Preferences

If a preference was identified, explain how the use of a preference or method of prioritization will address the unmet need or gap in benefits and services received by individuals and families in the qualifying population or subpopulation of qualifying population, consistent with the PJ's needs assessment and gap analysis:

Not applicable. The City will not provide a preference amongst any of the qualified populations.

Referral Methods

PJs are not required to describe referral methods in the plan. However, if a PJ intends to use a coordinated entry (CE) process for referrals to a HOME-ARP project or activity, the PJ must ensure compliance with Section IV.C.2 of the Notice (page10).

A PJ may use only the CE for direct referrals to HOME-ARP projects and activities (as opposed to CE and other referral agencies or a waitlist) if the CE expands to accept all HOME-ARP qualifying populations and implements the preferences and prioritization established by the PJ in its HOME-ARP allocation plan. A direct referral is where the CE provides the eligible applicant directly to the PJ, subrecipient, or owner to receive HOME-ARP TBRA, supportive services, admittance to a HOME-ARP rental unit, or occupancy of a NCS unit. In comparison, an indirect referral is where a CE (or other referral source) refers an eligible applicant for placement to a project or activity waitlist. Eligible applicants are then selected for a HOME-ARP project or activity from the waitlist.

The PJ must require a project or activity to use CE along with other referral methods (as provided in Section IV.C.2.ii) or to use only a project/activity waiting list (as provided in Section IV.C.2.iii) if:

1. the CE does not have a sufficient number of qualifying individuals and families to refer to the PJ for the project or activity;
2. the CE does not include all HOME-ARP qualifying populations; or,
3. the CE fails to provide access and implement uniform referral processes in situations where a project's geographic area(s) is broader than the geographic area(s) covered by the CE

If a PJ uses a CE that prioritizes one or more qualifying populations or segments of qualifying populations (e.g., prioritizing assistance or units for chronically homeless individuals first, then prioritizing homeless youth second, followed by any other individuals qualifying as homeless, etc.) then this constitutes the use of preferences and a method of prioritization. To implement a CE with these preferences and priorities, the PJ **must** include the preferences and method of prioritization that the CE will use in the preferences section of their HOME-ARP allocation plan. Use of a CE with embedded preferences or methods of prioritization that are not contained in the PJ's HOME-ARP allocation does not comply with Section IV.C.2 of the Notice (page10).

Identified Referral Methods

Identify the referral methods that the PJ intends to use for its HOME-ARP projects and activities. PJ's may use multiple referral methods in its HOME-ARP program. (Optional):

The City plans on using multiple referral methods in order to accommodate all of the qualifying populations.

If the PJ intends to use the coordinated entry (CE) process established by the CoC, describe whether all qualifying populations eligible for a project or activity will be included in the CE

process, or the method by which all qualifying populations eligible for the project or activity will be covered. (Optional):

The Continuum of Care will serve as one of the sources of referral for HOME-ARP funded projects. It is expected that the Continuum of Care will continue to use its existing coordinated entry (CE) process to refer client who are literally homeless or actively fleeing domestic violence. The CoC is currently working on the expansion of CE to include those who are at-risk of homelessness and those who qualify under “other populations”. By including homeless prevention in CE, service providers who offer prevention should be able to increase coordination and prevent duplication. Other sources of referral will include HOME-ARP funded subrecipients who do not participate in the CE process, including other populations where providing assistance would prevent homelessness.

If the PJ intends to use the CE process established by the CoC, describe the method of prioritization to be used by the CE. (Optional):

Order of Priority for Permanent Supportive Housing

1. Chronically Homeless with the Longest History of Homelessness and with the Most Severe Service Needs
2. Chronically Homeless with the Most Severe Service Needs
3. Chronically Homeless with the Longest History of Homelessness
4. Chronically Homeless with the greatest number of risks and barriers
5. Household with the earliest date of Coordinated Entry assessment

Order of Priority for Rapid Re-housing

- 1) Literally Homeless with the Longest History of Homelessness and with the Most Severe Service Needs
- 2) Literally Homeless Individuals and Families with the Most Severe Service Needs
- 3) Literally Homeless Individuals and Families with the Longest History of Homelessness
- 4) Literally Homeless individuals and Families with the greatest number of risks and barriers
- 5) Household with the earliest date of Coordinated Entry assessment.

If the PJ intends to use both a CE process established by the CoC and another referral method for a project or activity, describe any method of prioritization between the two referral methods, if any.

At this time, the City will not establish a priority among referral methods for HOME-funded ARP projects. Referrals will be processed in chronological order.

Limitations

Limiting eligibility for a HOME-ARP rental housing or NCS project is only permitted under certain circumstances.

- PJs must follow all applicable fair housing, civil rights, and nondiscrimination requirements, including but not limited to those requirements listed in 24 CFR 5.105(a). This includes, but is not limited to, the Fair Housing Act, Title VI of the Civil Rights Act, section 504 of Rehabilitation Act, HUD's Equal Access Rule, and the Americans with Disabilities Act, as applicable.
- A PJ may not exclude otherwise eligible qualifying populations from its overall HOME-ARP program.
- Within the qualifying populations, participation in a project or activity may be limited to persons with a specific disability only, if necessary, to provide effective housing, aid, benefit, or services that would be as effective as those provided to others in accordance with 24 CFR 8.4(b)(1)(iv). A PJ must describe why such a limitation for a project or activity is necessary in its HOME-ARP allocation plan (based on the needs and gap identified by the PJ in its plan) to meet some greater need and to provide a specific benefit that cannot be provided through the provision of a preference.
- For HOME-ARP rental housing, section VI.B.20.a.iii of the Notice (page 36) states that owners may only limit eligibility to a particular qualifying population or segment of the qualifying population if the limitation is described in the PJ's HOME-ARP allocation plan.
- PJs may limit admission to HOME-ARP rental housing or NCS to households who need the specialized supportive services that are provided in such housing or NCS. However, no otherwise eligible individuals with disabilities or families including an individual with a disability who may benefit from the services provided may be excluded on the grounds that they do not have a particular disability.

Project Limitations

Describe whether the PJ intends to limit eligibility for a HOME-ARP rental housing or NCS project to a particular qualifying population or specific subpopulation of a qualifying population identified in section IV.A of the Notice:

The City does not intend to fund projects that limit eligibility for any HOME-ARP funded rental housing or NCS project to a specific qualifying population. All funded projects will comply all applicable fair housing, civil rights, and nondiscrimination requirements.

If a PJ intends to implement a limitation, explain why the use of a limitation is necessary to address the unmet need or gap in benefits and services received by individuals and families in the qualifying population or subpopulation of qualifying population, consistent with the PJ's needs assessment and gap analysis:

The City does not intend to fund projects that limit eligibility for any HOME-ARP funded rental housing or NCS project to a specific qualifying population. All funded projects will comply all applicable fair housing, civil rights, and nondiscrimination requirements.

If a limitation was identified, describe how the PJ will address the unmet needs or gaps in benefits and services of the other qualifying populations that are not included in the limitation through the use of HOME-ARP funds (i.e., through another of the PJ's HOME-ARP projects or activities):

The City does not intend to fund projects that limit eligibility for any HOME-ARP funded rental housing or NCS project to a specific qualifying population. All funded projects will comply all applicable fair housing, civil rights, and nondiscrimination requirements.

HOME-ARP Refinancing Guidelines

If the PJ intends to use HOME-ARP funds to refinance existing debt secured by multifamily rental housing that is being rehabilitated with HOME-ARP funds, the PJ must state its HOME-ARP refinancing guidelines in accordance with [24 CFR 92.206\(b\)](#). The guidelines must describe the conditions under which the PJ will refinance existing debt for a HOME-ARP rental project, including:

- ***Establish a minimum level of rehabilitation per unit or a required ratio between rehabilitation and refinancing to demonstrate that rehabilitation of HOME-ARP rental housing is the primary eligible activity.***

Not applicable. The City does not intend to refinance existing debt using HOME-ARP funds.

- ***Require a review of management practices to demonstrate that disinvestment in the property has not occurred; that the long-term needs of the project can be met; and that the feasibility of serving qualified populations for the minimum compliance period can be demonstrated.***

Not applicable. The City does not intend to refinance existing debt using HOME-ARP funds.

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

Not applicable. The City does not intend to refinance existing debt using HOME-ARP funds.

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

Not applicable. The City does not intend to refinance existing debt using HOME-ARP funds.

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

Not applicable. The City does not intend to refinance existing debt using HOME-ARP funds.

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

Not applicable. The City does not intend to refinance existing debt using HOME-ARP funds.