

HOUSING & COMMUNITY DEVELOPMENT BLOCK GRANT CONSOLIDATED PLAN PROGRAM YEARS 2015-2019

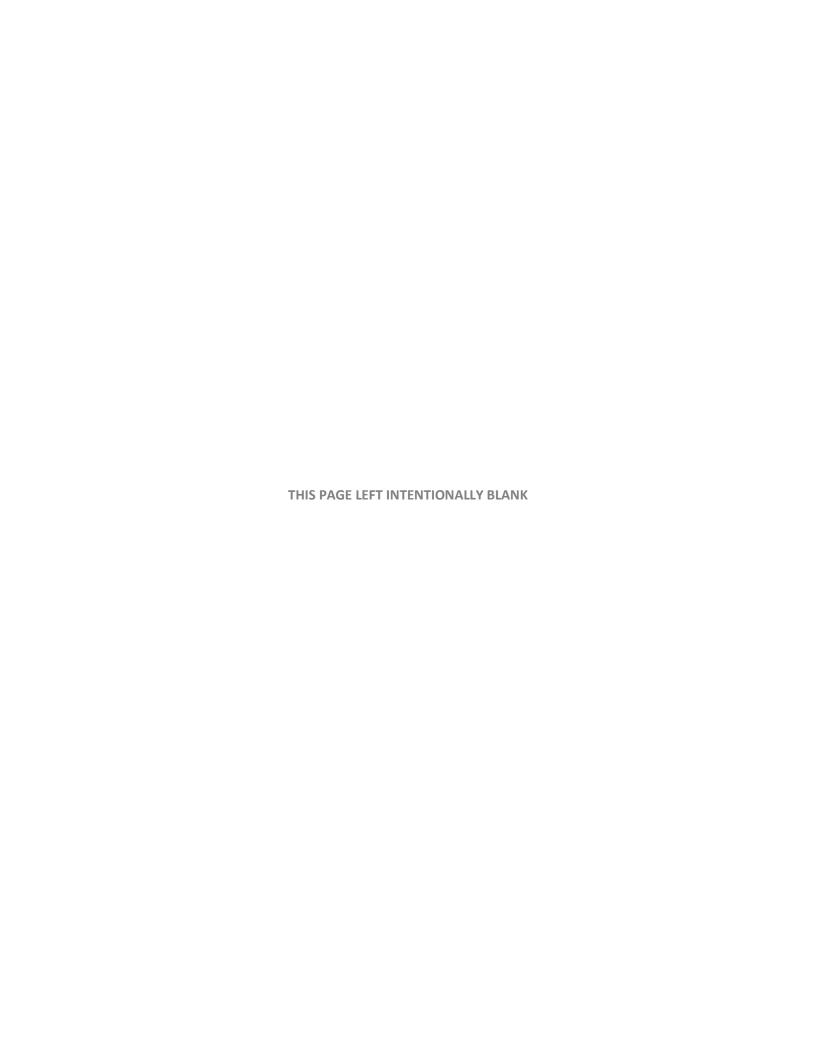
2019 Annual Action Plan Fifth Program Year

This Action Plan sets forth funding priorities for the 2019 funding year and serves as the City's annual funding application to the U.S. Department of Housing and Urban Development for the following grant programs:

Community Development Block grant (CDBG); the HOME Investment Partnership Program (HOME); and the Emergency Solutions Grant

DRAFT (12-14-18)







Executive Summary

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

1. Introduction

This Annual Action Plan (AAP), effective from January 1, 2019 through December 31, 2019, is intended to promote decent, safe, sanitary, and affordable housing, as well as neighborhood stability within the City of Aurora. It continues to address long-standing housing and community development priorities defined in the City's 2015-2019 Consolidated Plan, which include physical, economic, demographic, and social conditions throughout the city. As the lead agency, the City of Aurora's Neighborhood Redevelopment Division (NRD) is responsible for carrying out activities to meet the Plan's priority needs.

The Annual Action Plan describes the activities the City intends to undertake in Program Year 2019 with funds received from the U.S. Department of Housing and Urban Development (HUD). The programs include the Community Development Block Grant Program (CDBG), HOME Investment Partnerships Program (HOME), and Emergency Solutions Grant Program (ESG).

The City's 2019 allocations are based upon an estimate as per 100% of the City's 2018 annual allocations, and will be selected and approved by City Council on January 22, 2019.

The Annual Action Plan describes the activities the City intends to undertake in Program Year 2019 with funds received from the U.S. Department of Housing and Urban Development (HUD). The programs include the Community Development Block Grant Program (CDBG) and the HOME Investment Partnerships Program (HOME), Emergency Solutions Grant Program (ESG), and Section 108 Program.

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.

In keeping with the City's 2015-2019 Consolidated Plan priorities, the City identified the following higher priority non-housing needs for the upcoming 2019 Program Year:

The 2019 Program Year Outcomes are found in the AP-20, "Goals and Outcomes." In summary, the City's objectives include increase youth services, especially those proposals/projects which complement overall City goals of violence prevention and youth education; provide supportive services for elderly/disabled persons; provide employment training to unemployed persons. Mitigate or prevent homelessness; increase/improve the quality of facilities (including public service facilities); help smaller businesses create or retain full time jobs at a living wage. Improve rate of survival of micro-enterprise businesses; provide micro-business expansion within locally selected neighborhoods, including the NRSA; and initiate improvement efforts in locally selected geographical areas that complement City Neighborhood Plans.

In addition to meet HUD's CDBG National Objectives of Low to Moderate Income (LMI) Benefit, the City also evaluated projects based upon the following criteria:

- 1. Ability to address a City Objective
- 2. Capacity and experience of the organization
- 3. Leveraged resources
- 4. Project Readiness
- 5. Location/service area

The City also continues to work toward meeting its housing priority needs which are as follows:

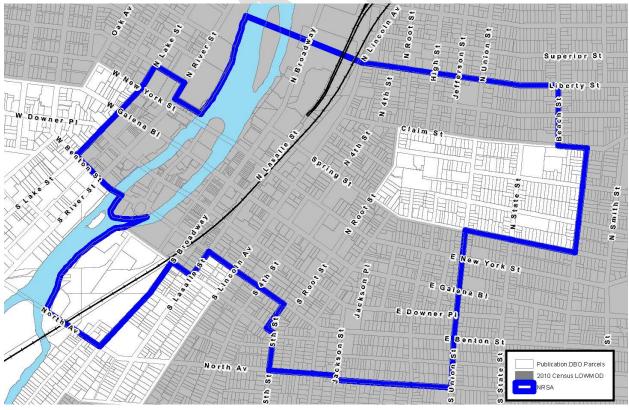
Existing housing in need of repairs of renovations in order to meet current building codes, lead paint mitigation standards, or greater energy efficiency standards, and owned and occupied by income-eligible households whose housing costs exceed 30% of income.

Households between 40% and 80% of median income who that are trying to purchase their own homes and contribute to the stabilization of neighborhoods within the city.

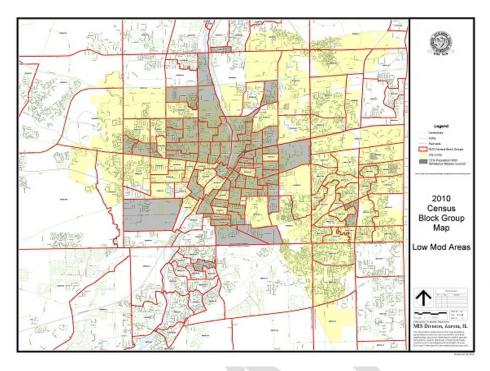
Income-eligible renter households with housing cost burdens greater than 30% of their income, living in housing in need of repairs or renovation in order to meet current building codes, lead paint mitigation standards, or greater energy efficiency standards.

Very low-income households at risk of becoming homeless or currently homeless households who are currently homeless and that are very mobile within Aurora, and who are proportionately larger users of human services, health care, or emergency services.

The City will also continue to work within the HUD-approved Neighborhood Revitalization Strategy Area (NRSA) encompassing the City's near-east side and its downtown, covering portions of census tracts 8533.02; 8534.03 (per 2010 Census update, no longer considered an LMI census tract); 8534.04;8536.03; 8536.04; 8537.01; 8537.02; 8541.02. The NRSA has concentrations of low-income residents, substandard housing and overcrowded housing. The NRSA was first approved by HUD in 1999 and was amended and approved in 2011. Since the adoption of its 2015-2019 Consolidated Plan, the City recognized changes to CT/BGs within the NRSA impact its boundaries. The City will seek the consultant services to facilitate the public participation process as it reviews the existing boundaries and proposes amendments to address the changing LMI CT/BG areas and to further explore whether areas adjacent to the NRSA can be included. As before, this effort will require HUD approval and until such time as it moves forward, the City will continue to use the amended 2011 Strategy through the remainder of its Consolidated Plan period. The City anticipates that the NRSA amendment effort will commence during the 2019 Program Year in conjunction with the development of the City's 2020-2025 Consolidated Plan.



NRSA Map



City of Aurora LMI Areas (Gray Shaded Areas=LMI CT/BGs)

3. Evaluation of past performance

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

At the time of this Annual Action Plan, the City is nearing the close of its 2018 Program Year. During the 2018 Program Year, the City allocated over \$1.3 million in CDBG funds toward housing, public services, and capital improvement projects. Because the City's 2018 program funds are still pending release from HUD, the City has been unable to move forward on its 2018 capital projects which include public facility improvements, infrastructure improvements or its housing activities which include down payment assistance and single-family housing rehabilitation. However, during the City's 2018 Program Year, due to delays in the City's 2017 HUD funds, the City moved forward on its 2017 capital and housing activities which will be reported in its 2018 Consolidated Annual Performance Evaluation Report. As per the City's 3rd quarter, the City's CDBG 2018 public service funds have been used to assist 5,462 beneficiaries as follows:

- Operating Costs of Homeless/AIDS Patients Programs: 519
- Senior Services: 4,701 (may include duplicate numbers which will be removed at the close of the program year)
- Legal Services: 29Youth Services: 112
- Substance Abuse Services: 42

Battered and Abused Spouses: 59

All beneficiaries were required to meet HUD's National Objective of Low-Moderate Income (LMI) Benefit standards. Due to the City's delayed receipt of 2018 CDBG funds, the capital projects were unable to move forward during the program year; it is anticipated that the projects will move forward during the 2019 Program Year. The anticipated LMI beneficiaries under the City's capital improvement funding allocations are as follows:

- Neighborhood Revitalization: 5,055 (reflects LMI population in service area CT/BGs: 88529.05 BG2, 8529.07, BG 3, 8534.00 BG 6, 8535.00 BGs 3 and 4, 8536.00 BG 3)
- Public Facilities: 751 Aurorans (2,222 total clients)

HUD Timeliness Requirements

In the CDBG program, one regulatory measure used by HUD to evaluate performance is the timeliness ratio test. This is a formula that measures the amount of an entitlement community's unexpended funds sixty days prior to the start of its next program year in relation to the amount of funding it receives, and the ratio cannot exceed 1.5. The City's timeliness is measured on November 2nd of each year. This year the City's timeliness ratio was 1.42, slightly below the 1.5 threshold set by HUD. A few factors contributed to a higher than normal timeliness ratio, including the late disbursement of 2017 program funds, which delayed several capital projects as well as the cancellation of projects. The City expects to expend a large amount of funds before its next timeliness and is confident the timeliness ratio will be well under 1.5 before the Consolidated Annual Performance Evaluation Report (CAPER). Since the beginning of the City's CDBG program participation, the City has consistently exceeded HUD's 70 percent requirement in its funding of activities that benefit low and moderate-income persons.

The HOME program uses commitment and expenditure deadlines to measure performance. Although committing CHDO funds has been difficult in the past, the City will continue to be proactive in seeking projects to meet its CHDO and direct activity deadlines.

The ESG program uses drawdown requirements to measure performance. Upon receipt of its 2018 ESG funds and future ESG funds, the City will make every effort to ensure consistency in its drawdowns of ESG funds.

While these financial tests are required and are measurements of performance, it is also important that projects and programs carried out with these funds meet outcome expectations and benefit eligible persons. Reporting on outcomes and beneficiaries is made available each March in the Consolidated Annual Performance and Evaluation Report (CAPER).

4. Summary of Citizen Participation Process and consultation process

Summary from citizen participation section of plan.

2019 AAP Citizen Participation Process: The City announced its pre-application CDBG workshop on July 2, 2018. The mandatory workshop for potential 2019 applicants was held on August 10, 2018. At that time, in addition to presenting the City's anticipated CDBG allocations, the City also presented its intentions for its HOME Investment Partnerships (HOME) allocation with funding designated for program administration (10% of anticipated allocation) and the Direct Project and Community Housing Development Organization set-aside activities TBD as well as its Emergency Solutions Grant (ESG) with funding designated for program administration (7.5%) and the remainder TBD for activities related to: street outreach, emergency shelter, homelessness prevention, rapid re-housing, and/or Homeless Management Information System Data Collection. The CDBG application period was open for over a month. 18 applications were submitted by the October September 21, 2018 deadline, with one of the applications subsequently withdrawn by the applicant on October 30, 2018. City staff reviewed the applications and then conducted a special meeting to review the applications with the Block Grant Working Committee (BGWC) on November 28, 2018. At that time, the BGWC voted on and unanimously approved 10 of the applications and one new to be determined neighborhood revitalization project for recommendation to the City Council. A public hearing is scheduled for December 17, 2018. The 2019 Annual Action Plan public comment period will conclude on January 22, 2019, the date of the City Council's meeting during which time the recommendations will be reviewed and approved by City Council.

The development and adoption of the City's 2019 Annual Action Plan is consistent with the City's Citizen Participation Plan and all applicable HUD regulations.

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.

A public hearing for the City's 2019 Annual Action Plan is scheduled for December 17, 2018. At this time, public comments have not been submitted. Any public comments will addressed by the City and will also be included in the final Plan that is submitted to HUD.

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

A public hearing for the City's 2019 Annual Action Plan is scheduled for December 17, 2018 at 5:00 p.m., at City Hall, Council Chambers, 2nd Floor, 44 E. Downer Place, Aurora, Illinois. Public comments will be accepted until the close of the public comment period on January 22, 2019. All comments will be provided to HUD.

7. Summary

The City's 2019 HUD funds will be used to meet goals and objectives established and approved by HUD. The 2019 Plan's goals and objectives were developed as per the above noted public participation

process. The 2019 Plan's funding allocations were also approved by the City in an effort to meet the goals and objectives outlined in the City's overall 2015-2019 Goals and Objectives which were developed based upon the City's consultation with citizens, nonprofit organizations, developers, businesses, funding partners, schools and other governmental bodies. Their overarching purpose is to support the development of viable communities with decent housing, suitable living environments and economic opportunities for the City's low to moderate income households.

The City will pursue these goals and objectives by working with the nonprofit community, housing developers, neighborhood groups, associated businesses, stakeholders, labor union representatives, other local government entities, residents and partners. The Neighborhood Redevelopment Division will also work closely with several other City agencies to jointly plan, implement and evaluate the Plan's core activities.

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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	AURORA	
CDBG Administrator	AURORA	Neighborhood Redevelopment Division
HOME Administrator	AURORA	Neighborhood Redevelopment Division
ESG Administrator	AURORA	Neighborhood Redevelopment Division

Table 1 – Responsible Agencies

Narrative (optional)

As a HUD entitlement grantee, the City of Aurora has designated its Neighborhood Redevelopment Division (NRD) as the lead agency for administration of the CDBG, HOME and ESG Programs. The City's Block Grant Working Committee serves as the policy body overseeing that provides oversight to the development of the Consolidated Plan, the Annual Action Plan, and related housing and community development programs. The (NRD) works with area community development and housing organizations, businesses, and funders to plan, develop, implement, and evaluate activities outlined in this Plan. The City of Aurora serves as the overall administrator for the programs and activities under this Plan.

Consolidated Plan Public Contact Information

Chris Ragona, Community Development Manager Innovation and Core Services Department Neighborhood Redevelopment Division 51 E. Galena Blvd. Aurora, IL 60505 630-256-3320 nrd@aurora-il.org

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

1. Introduction

The City's 2019 Annual Action Plan (AAP) was prepared by its Neighborhood Redevelopment Division. As the lead agency, the City of Aurora's Neighborhood Redevelopment Division (NRD) is responsible for carrying out activities to meet priority needs. The City followed its Citizen Participation Plan in announcing its 2019 AAP funding cycle as well as its 2019 draft AAP.

The City announced its pre-application CDBG workshop on July 2, 2018. The mandatory workshop for potential 2019 applicants was held on August 10, 2018. At that time, in addition to presenting the City's anticipated CDBG allocations, the City also presented its intentions for its HOME allocation with funding designated for program administration (10% of anticipated allocation) and the Direct Project and Community Housing Development Organization set-aside activities TBD as well as its Emergency Solutions Grant (ESG) with funding designated for program administration (7.5%) and the remainder TBD for activities related to: street outreach, emergency shelter, homelessness prevention, rapid rehousing, and/or Homeless Management Information System Data Collection. The CDBG application period was open for over a month. Eighteen applications were submitted by the September 21, 2018 deadline, with one of the applications subsequently withdrawn by the applicant on October 30, 2018. City staff reviewed the applications and then conducted a special meeting to review the applications with the Block Grant Working Committee (BGWC) on November 28, 2018. At that time, the BGWC voted on and unanimously approved 10 of the applications. Due to the remainder of unexpended funds in the amount of \$304,234, it was determined that the funds be allocated to a to be determined neighborhood revitalization project for recommendation to the City Council. A public hearing is scheduled for December 17, 2018. The 2019 Annual Action Plan public comment period will conclude on January 22, 2019, the date of the City Council's meeting during which time the recommendations will be reviewed and approved by City Council. Copies of the notices will be made available in the 2019 AAP's Citizen Participation Comments Appendix.

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 makes an effort to communicate and carry on a dialogue with service providers and the community-at-large about the Consolidated Plan goals, objectives, and activities to support the current Plan. In addition, staff from the Mayor's office participates in a variety of non-profit roundtable discussions and coordinates meetings to identify needs for service and investment within the community.

Annual Action Plan – DRAFT (12-2-18)

Enhanced coordination efforts is demonstrated in recent success in the City's HOME funded senior living center project which was completed in May 2017. The project included 44 Project Based Vouchers (PBV) and partnerships with numerous entities including Evergreen Realty (affordable housing developer), Northern Lights Development Corporation (non-profit housing development arm of the Aurora Housing Authority), Aurora Housing Authority, Invest Aurora, and IHDA (LIHTC). Continued success demonstrated through the City's anticipated mixed use development, Aurora Arts Centre Project, which includes partnerships with The Community Builders (affordable housing developer), Paramount Theatre, Invest Aurora, IHDA (LIHTC), IL DCEO (River's Edge Zone Credits), and Association for Individual Development (AID).

The City also continues its coordination efforts through its Frequent Users of Systems Engagement (FUSE) partnership with other rapid rehousing, health, and mental health and service agencies. This effort is further described in "AP-65, Homeless and Other Special Needs Activities".

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 of Aurora actively participates in the Kane County Continuum of Care (CoC) system and is one of three local governments that provide non-federal funding on an annual basis to administratively support the CoC. As an active partner of the CoC, the City is a substantial force to promote better outreach, case management, and planning to address homeless issues in the City.

Hesed House, the largest homeless services provider in the City, is located in a former municipal building. This building was converted into a full service homeless facility through the use of City funds. Hesed House has become the second largest homeless shelter in the State of Illinois and has established a comprehensive resource center to help transition individuals out of homelessness. The City supported this community resource, and other homeless services, expand over the last three years by completing facilities improvement infrastructure projects funded via the CDBG program and local funds.

Goals and objectives for persons with special needs benefit from programs and services provided by social service agencies listed below that received 2019 funding,

- Supportive services for the elderly and disabled assistance to Senior Services Associates
- Increase youth services and employment training to unemployed persons assistance to City of Aurora Innovation and Core Services

 Department for youth career training

Annual Action Plan – DRAFT (12-2-18)

• Improve quality of homes for the elderly and disabled – assistance to Rebuilding Together Aurora for home accessibility repairs.

The City and its CoC partners continue to press for funding and program efficiencies to maintain the County's over 300 emergency shelter beds in the face of greater program demand. In addition to the vital service base provided with emergency shelter beds, the City and its partners also emphasize transitional housing as a strategic response to reduce homelessness. To help individuals and families work toward permanent housing and self-sufficiency each organization provides case management and other supportive services, which include life skills training, advocacy, and referrals to partner agencies. These services are provided to individuals or families experiencing, or at risk of experiencing, homelessness to help them address the root cause(s) of homelessness and maintain stable housing.

Aurora will continue participating in the Kane County Continuum of Care and will support implementation for the actions and activities outlined in the Continuum's Homeless Strategy. Also, under PY 2019, the City allocated funding to mitigate or prevent homelessness by providing assistance to Breaking Free's Homeless Substance Abuse Treatment Services, Mutual Ground's Emergency Shelter (domestic violence), and Hesed House's SEEDs Homeless Services Management.

Additional information regarding the City's effort to address its special populations as it relates to its partnerships with the Aurora Housing Authority and Kane County Continuum of Care are further described in AP-60 and AP-65, respectively.

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

The City will continue to work closely with the CoC and HUD field office to define requirements for allocating ESG funds for eligible activities to best meet the needs of people in the City. To date, the City has not received its 2018 ESG allocation. As a result, the City has been unable to move forward in engaging the services of a consultant to develop performance standards and evaluate outcomes, and will help to develop funding, policies, and procedures for the operation and administration of the HMIS, all of which will be developed to complement the CoC's goals, objectives, and priority needs. Once the City receives its release of HUD funds, it will begin the development of its ESG Program immediately.

As the City works to implement its ESG program, the City intends to use the CoC's written standards as a template for creating its own guidelines for the provision of ESG assistance for its 2018 and 2019 allocations. The City will adopt core performance metrics similar to those being used by the Continuum of Care, adding metrics as needed to address specific City priorities.

Annual Action Plan – DRAFT (12-2-18)

The City of Aurora is an active participant in the Kane County Continuum of Care (CoC) system and is one of three local governments that provide non-federal funding on an annual basis to cover the cost of CoC administration. The CoC Board is chaired by a City representative, and the City's largest homeless services provider is a key participant in the CoC's HMIS planning and evaluation processes. Continuum of Care membership is open to agencies that serve Kane County's homeless residents and individuals that have an interest in ending homelessness in Kane County. The following organizations have participated in the Kane County Continuum of Care's activities:

- -360 Youth Services
- -Association for Individual Development
- -Catholic Charities
- -Citizen Member
- -City of Aurora
- -City of Elgin
- -Community Crisis Center
- -Ecker Center for Mental Health
- -Hesed House
- -Hines VA Hospital
- -Kane County
- -Kane County Regional Office of Education
- -Lazarus House
- -Midwest Shelter for Homeless Veterans

- -Mutual Ground
- -PADS of Elgin
- -Prairie State Legal 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

Please see Citizen Participation Comments Attachment 1 for Table 2 – Agencies, groups, organizations who participated

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

Efforts to include all agency types relevant to the Annual Action Plan were contacted for input into the process and development of the 2019 AAP. These efforts included email notices, public notices at the City and three library branches, website notice, newspaper notices, and a public hearing. Additionally, the Neighborhood Redevelopment Division communicates throughout the year with the various agencies, partners, and government bodies to gather information and identify needs.

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

Name of Plan	Lead	How do the goals of your Strategic Plan overlap with the goals of each plan?
	Organization	
		The Continuum of Care Kane County was created in 1999 and includes the Kane County CDBG
		Program Area and the Cities of Aurora and Elgin. The Continuum consists of organizations and
	Kane County	agencies that assist individuals and families that are at-risk of being homeless or are in various stages
Continuum of		of homelessness. These social service agencies provide: Outreach, Assessment and Intake; Emergency
Care		Shelter; Permanent Housing; Permanent Supportive Housing; and Supportive Services. The Continuum
		is responsible for the coordination of all of the social service agencies throughout the County to
		ensure that all gaps and overlaps in services are addressed. The City participates in the CoC addresses
		to further enhance its 2015-2019 Consolidated Plan goal to mitigate or prevent homelessness.

Table 3 – Other local / regional / federal planning efforts

Narrative (optional)

Not applicable.



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

To ensure citizen participation, the City of Aurora adopted a Citizen Participation Plan on September 4, 2010. The Plan can be found here: https://www.aurora-il.org/documents/neighborhoodredevelopment/doc_2010_citizen_participation_plan.pdf

The following dates reflect the City's public comment periods for its 2019 Annual Action Plan Approval:

1. December 2, 2019 to January 22, 2019

The City's 2019 Draft Annual Action Plan was made available for public comment on December 2, 2018. The public comment period is scheduled to conclude on January 22, 2019. Copies of the City's draft 2019 Annual Action Plan a were available for public display on the beginning dates of each public comment period at the at the following locations: City of Aurora-Neighborhood Redevelopment, 51 E. Galena Blvd, Aurora, IL; Library-Main, 101 S. River St., Aurora, IL; Library-Eola, 555 S. Eola Rd., Aurora, IL; Library-West, 233 S. Constitution Dr., Aurora, IL; and on the City of Aurora website: www.aurora-il.org.

Per the City's Public Participation Plan, copies of the Annual Action Plan were made available online, at the City's three library branches, and at the City's Neighborhood Redevelopment Division office.

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 8-10-18	General Public/Non-Profit Organizations	55	Questions were asked by potential applicants with regard to eligible activities and application deadline.	Not applicable	
2	Public Meeting 11-28-18	General Public/Non-Profit Organizations	The Block Grant Working Committee met to review CDBG funding proposals and to make recommendations to the City Council.	TBD	TBD	
3	Newspaper Ad 12-2-18	General Public/Non-Profit Organizations	With this newspaper publication, the minimum 30-day public comment period was initiated.	TBD	TBD	
4	Internet Outreach 12-2-18	General Public/Non-Profit Organizations	With this online publication, the minimum 30-day public comment period was initiated.	TBD	TBD	

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)
	Public Notice					
	Posting at					
	Libraries, City Hall,		With this public			
	and	General	library notice, the			
5	Neighborhood	Public/Non-Profit	minimum 30-day	TBD	TBD	
	Redevelopment	Organizations	public comment			
	Division		period was initiated.			
	12-2-18					
	Public Hearing	General				
6		Public/Non-Profit	TBD	TBD	TBD	
	12-17-18	Organizations				
	Public Meeting					
		General				
7	1-10-19: Planning	Public/Non-Profit	TBD	TBD	TBD	
	& Dev. Committee	Organizations				
	Mtg.					
	Public Meeting					
8	1-15-19:	General Public	TBD	TBD	TBD	
	Committee of the					
	Whole					
	Public Meeting					
9		General Public	TBD	TBD	TBD	
	1-22-19: City	25				
	Council					

Table 4 – Citizen Participation Outreach

Expected Resources

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

Contingency Statement:

The City will administer approximately \$5,879,994 during the 2019 program year. Projects will be funded by Community Development Block Grants (CDBG), HOME Investment Partnerships (HOME,) the Emergency Solutions Grant (ESG), and Section 108 Loan and are listed in AP-35 Projects segment. The funds provided from these grants include new 2019 funds as well as projected program income from prior years' loan repayments. There are also reallocated funds from prior years. In 2017, the City received \$6 million through HUD's Section 108 Loan Guarantee Program, of which \$3 million remains available. The CDBG, HOME and ESG Funds are programmed with regulatory caps in mind. This includes the 20% administration cap for CDBG, the 10% administration cap for HOME, and the 7.5% administration cap for ESG. If the City receives less than the anticipated amount of funding, project amounts will be reduced accordingly. These actions may take place without triggering a Substantial Amendment to this Action Plan.

The City is making assumptions on its receipt of level funding as per its 2018 funding allocations and has the following contingency plan in place for when actual amounts are announced. If the 2019 CDBG funding is increased by 10%, administration will be increased to its respective percentage cap. Any additional funding will be placed in the neighborhood revitalization category. A CDBG funding decrease will result in a drop in administration and public service funding to their respective maximum percentages with public services evenly reduced across each project. Additional funding will then be reduced from the neighborhood revitalization category.

ESG funding administration and projects will be increased or decreased evenly based on the actual funding amounts. Lastly, HOME administration will be increased or decreased to the maximum percentage based on actual funding amounts. HOME projects, once selected, will be underwritten and actual funding will be combined with unallocated 2017 and 2018 HOME funds to determine the best use of funds. Any major increases or decreases to grant funding may require a substantial amendment, and the City will follow its Citizen Participation Process

Annual Action Plan – Draft (12-2-18) 2019 when making this determination.

The City's Expected Resources reflect level funding per the City's 2018 allocation:

Special Notes:

CDBG: In addition to its estimated 2019 funds, any unexpended 2018 program administration and public service funds will be allocated to the Neighborhood Revitalization category. Prior Year Resources will be updated at the close of the City's 2018 Program Year.

Section 108: The City received a \$6M Section 108 Loan Guarantee from HUD in September 2017. Three Million of the \$6M Loan was committed to the Aurora Arts Centre economic development activities in December 2017. As the City's Section 108 Loan Program develops further, the City will seek additional Section 108 projects, which will require approval from HUD and the City Council. The below Section 108 \$3M reflects carryover funds. At this time, it is not anticipated that the City will apply for additional Section 108 Funds from HUD.

Anticipated Resources

Program	Source	Uses of Funds	Expe	cted Amou	nt Available Y	ear 1	Expected	Narrative Description
	of Funds		Annual	Program	Prior Year	Total:	Amount	
			Allocation:	Income:	Resources:	\$	Available	
			\$	\$	\$		Remainder	
							of ConPlan	
CDBG	public -	Acquisition					, ,	Please see above statement.
	federal	Admin and						
		Planning						
		Economic						
		Development						
		Housing		/				
		Public						
		Improvements						
		Public Services	1,641,583	0	0	1,641,583	0	

Program	Source	Uses of Funds	Expe	cted Amou	nt Available Yo	ear 1	Expected	Narrative Description
	of Funds		Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$	Amount Available Remainder of ConPlan	
							\$	
HOME	public -	Acquisition						Please see above statement.
	federal	Homebuyer						
		assistance						
		Homeowner						
		rehab						
		Multifamily rental						
		new construction						
		Multifamily rental						
		rehab						
		New construction						
		for ownership						
		TBRA	750,553	0	0	750,553	0	

Program	Source	Uses of Funds	Expe	cted Amour	nt Available Yo	ear 1	Expected	Narrative Description
	of Funds		Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$	Amount Available Remainder of ConPlan \$	
ESG	public -	Conversion and						Please see above statement.
	federal	rehab for						
		transitional						
		housing						
		Financial						
		Assistance						
		Overnight shelter						
		Rapid re-housing						
		(rental assistance)						
		Rental Assistance						
		Services						
		Transitional						
		housing	136,287	0	0	136,287	0	
Section	public -	Economic						The City received a \$6M Section 108
108	federal	Development						Loan Guarantee from HUD in
		Housing						September 2017. Three Million of the
		Other						\$6M Loan was committed to the
								Aurora Arts Centre economic
								development activities in December
			0	0	3,000,000	3,000,000	3,000,000	2017.

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

This AAP outlines activities using funding from the Community Development Block Grant Program, HOME Investment Partnerships Program, Emergency Solutions Grant Program, and Section 108 Program. Funds are leveraged with those of nonprofit community development, housing and social service partners. Many of the 2019 HUD funded projects will be funded by local and private funds. The 2019 projects are required to demonstrate leveraged funds during the application process.

Through CDBG, HOME, ESG and Section 108 Programs, the City collaborates with partners to deliver resources effectively. The City:

Works with service and housing providers to address the housing needs of the low-mod income residents and special needs populations.

Works across City Departments/Divisions to complete major capital projects including roadway improvements.

Collaborates with housing providers to fund rehabilitation of existing homes and rehabilitation/redevelopment of private rental housing.

Partners with agencies, non-profits, and private sector entities whose mission and programming further the housing and community development objectives outlined in this Plan.

The above collaborations allow the City to access gas tax, grants, tax credits, gaming and general fund sources to leverage.

The City of Aurora will satisfy HUD's 25% match requirements by relying upon either its sponsor/developer's demonstration of a 25% match or its HOME banked resources. Details regarding the match requirements can be found in AP-90 HOME Program Requirements.

As a first-time ESG recipient, the City's ESG Program Match Requirements are still under development; however, to satisfy the ESG's program match requirements per 24 CFR 576.201, City's ESG program must match its ESG grant funds with a dollar for dollar match. To meet this requirement, the City anticipates its and/or its (sub)recipients will meet the conditions of this 100 % match via allowable federal (other than ESG), state, local or private funds (cash and/or non-cash contributions which may include donated buildings or materials and volunteer services) as long as they meet the conditions outlined in 24 CFR 576.201 and further described in Section 24 CFR 576.500(o).

Annual Action Plan – Draft (12-2-18) 2019 If appropriate, describe publically owned land or property located within the jurisdiction that may be used to address the needs identified in the plan

Not applicable.

Discussion

See comments above.



Annual Goals and Objectives

AP-20 Annual Goals and Objectives

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Housing/Improve/Sustain	2015	2019	Affordable	Neighborhood	Housing/Improve Existing	CDBG:	Homeowner
	Existing Housing Supply			Housing	Revitalization	Supply	\$251,532	Housing
	0 0 11 7				Strategy Area			Rehabilitated: 85
					City of Aurora			Household
					Low-Mod			Housing Unit
					Census Tracts			
2	Housing/Rental	2015	2019	Affordable	Neighborhood	Housing/Rental	номе:	Rental units
				Housing	Revitalization		\$562,914	rehabilitated: 16
					Strategy Area			Household
					City of Aurora			Housing Unit
					Low-Mod			
					Census Tracts			
3	Public	2015	2019	Non-	Neighborhood	Public	CDBG:	Public service
	Services/Elderly/Special			Homeless	Revitalization	Services/Elderly/Special	\$30,000	activities other
	Needs			Special Needs	Strategy Area	Needs		than
				Non-Housing	City of Aurora			Low/Moderate
				Community	Low-Mod			Income Housing
				Development	Census Tracts			Benefit: 5,500
								Persons Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
4	Public Services/Employment	2015	2019	Non-Housing	Neighborhood	Public Services/Employment	CDBG:	Public service
	Training			Community	Revitalization	Training	\$50,000	activities other
				Development	Strategy Area			than
					City of Aurora			Low/Moderate
								Income Housing
								Benefit: 10
								Persons Assisted
5	Public	2015	2019	Homeless	City of Aurora	Public	CDBG:	Homelessness
	Services/Homelessness					Services/Homelessness	\$127,500	Prevention: 930
								Persons Assisted
6	Administration	2015	2019	CDBG/HOME	Neighborhood	CDBG Administration	CDBG:	Other: 201,110
	(CDBG/HOME/ESG)			Admin/CHDO	Revitalization	HOME Program	\$328,316	Other
				Operating	Strategy Area	administration	HOME:	
				Costs/ESG	City of Aurora		\$75,055	
					Low-Mod			
					Census Tracts			
7	Homelessness Prevention	2018	2019	Homeless	City of Aurora	Public	ESG:	Other: 201,110
	(ESG)					Services/Homelessness	\$136,287	Other
8	Neighborhood	2015	2019	Non-Housing	Neighborhood	Neighborhood	CDBG:	Public Facility or
	Revitalization/Improvements			Community	Revitalization	Improvements/Revitalization	\$804,234	Infrastructure
				Development	Strategy Area			Activities other
					City of Aurora			than
					Low-Mod			Low/Moderate
					Census Tracts			Income Housing
								Benefit: 12,000
								Persons Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
9	Economic Development	2017	2019	Affordable	Neighborhood	Economic	CDBG: \$0	Public Facility or
	(Section 108)	2017	2013	Housing	Revitalization	Development/Small	Section	Infrastructure
	(Section 108)			_		Businesses	108:	Activities other
				Non-Housing	Strategy Area			
				Community	City of Aurora	Housing/Rental	\$3,000,000	than
				Development	Low-Mod	Neighborhood		Low/Moderate
					Census Tracts	Improvements/Revitalization		Income Housing
						Public Facilities		Benefit: 1,000
								Persons Assisted
								Public Facility or
								Infrastructure
								Activities for
								Low/Moderate
								Income Housing
								Benefit: 29
								Households
								Assisted
								Jobs
								created/retained:
								29 Jobs
10	Economic	2015	2019	Non-Housing	Neighborhood	Economic	CDBG:	Businesses
	Development/Micro-			Community	Revitalization	Development/Micro-	\$50,000	assisted: 5
	Businesses			Development	Strategy Area	Businesses		Businesses
				·	Low-Mod	Economic		Assisted
					Census Tracts	Development/Small		
						Businesses		
				Table C. Co		Dasificaca		

Table 6 – Goals Summary

Goal Descriptions

Details regarding each Goal and their Description can be found within the AP-38 Section.

1	Goal Name	Housing/Improve/Sustain Existing Housing Supply
	Goal	
	Description	
2	Goal Name	Housing/Rental
	Goal	
	Description	
3	Goal Name	Public Services/Elderly/Special Needs
	Goal	
	Description	
4	Goal Name	Public Services/Employment Training
	Goal	
	Description	
5	Goal Name	Public Services/Homelessness
	Goal	
	Description	
6	Goal Name	Administration (CDBG/HOME/ESG)
	Goal	ESG program administration funds are allocated under the Homelessness Prevention (ESG) Activity.
	Description	
7	Goal Name	Homelessness Prevention (ESG)
	Goal	As a new ESG Program recipient, the City is in the process of developing this program to meet HUD's requirements.
	Description	Project allocations will be recommended via the City's citizen participation process at a future date.

8	Goal Name	Neighborhood Revitalization/Improvements
	Goal Description	
9	Goal Name	Economic Development (Section 108)
	Goal Description	The Section 108 loan funds will be borrowed by the City of Aurora and re-lent to one or more Developers, except in cases where the City serves as the developer. Section 108 Loans are available in the following three loan pools: Economic Development (\$1M), Affordable Housing Tax Credit Facilitation (\$1M) and Public Facilities (\$1M).
10	Goal Name	Economic Development/Micro-Businesses
	Goal Description	



Projects

AP-35 Projects – 91.220(d)

Introduction

The City allocates funding for projects based on the priority needs as established in the Goals and Objectives in its 2015-2019 Consolidated Plan. For the 2019 Program Year, the City approved the use of funds to address the needs related to the following: housing, neighborhood revitalization, public services, homelessness prevention, economic development, and program administration. Project activities and their associated subrecipient agency are identified in AP-38.

Projects

#	Project Name
1	Housing: Improve existing housing
2	Public Services
3	Neighborhood Revitalization/Improvements
4	Administration (CDBG and HOME)
5	Economic Development: Micro Businesses
6	Housing: Rental (HOME)
7	CHDO Project (HOME)
8	Homelessness Prevention: Program Admin and Direct Activities (ESG)
9	Section 108 Economic Development Loan Pool
10	Section 108 Affordable Housing Tax Credit Facilitation Loan Pool
11	Section 108 Public Facilities Loan Pool

Table 7 - Project Information

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

CDBG funds will mostly be used to address needs on a city-wide basis with individual low-to moderate income (limited-clientele benefit) beneficiaries. However, activities that provide an area benefit do so in areas that are determined to have a low-to moderate income population of at least 51%. A map attached to this Plan presents data on the low-to moderate income areas of the City of Aurora.

The major obstacles to addressing underserved needs are as follows.

- The City's ability to provide comprehensive service delivery has been hindered by continuing cutbacks in funding for social services. The lack of awareness concerning service availability and the lack of transportation impede effective delivery of services to those who need them.
- Efforts to adequately house the homeless are hindered by a lack of adequate space, by the lack of year round facilities, and by the aforementioned service delivery issues. The number of

homeless people is increased by a lack of transitional and permanent affordable housing.

• The City's general fund has insufficient resources to make needed infrastructure and public facility improvements, and important needs go unattended as a result.



AP-38 Project Summary

Project Summary Information



1	Project Name	Housing: Improve existing housing
	Target Area	Neighborhood Revitalization Strategy Area City of Aurora
	Goals Supported	Housing/Improve/Sustain Existing Housing Supply
	Needs Addressed	Housing/Improve Existing Supply
	Funding	CDBG: \$251,532
	Description	This project provides for housing rehabilitation to improve existing housing supply with units brought to code, made energy efficient and accessible.
	Target Date	12/31/2019
	Estimate the number and type of families that will benefit from the proposed activities	Approximately 85 low and moderate income households will benefit.
	Location Description	City-wide. Applicants will be qualified at the following agencies:
		CDBG-2019-01: Rebuilding Together Aurora, 31 W. Downer Pl., Suite 402, Aurora, IL 60506 (\$136,532)
		CDBG-2019-02: The Neighbor Project, 32 S. Broadway, Aurora, IL 60505 (\$115,000)
	Planned Activities	The City will partner with Rebuilding Together Aurora (\$136,532) and The Neighbor Project (\$115,000) to provide income-qualified homeowners with financial assistance to improve the City's existing housing supply with units brought up to code, made energy efficient, and accessible. Rebuilding Together Aurora's Safe at Home Grant Program focuses specifically upon households owned by special needs or disabled residents which are owner occupied. The Neighbor Project's Deferred Loan Program focuses specifically on addressing emergency code and safety housing repairs. Both programs offer up to \$4,999 in financial assistance.
2	Project Name	Public Services
	Target Area	City of Aurora
	Goals Supported	Public Services/Elderly/Special Needs Public Services/Employment Training Public Services/Homelessness

Needs Addressed	Public Services/Youth Public Services/Elderly/Special Needs Public Services/Employment Training Public Services/Homelessness
Funding	CDBG: \$207,500
Description	This project supports public services agencies that provide supportive services for youth, unemployed persons, senior services, and homelessness prevention.
Target Date	12/31/2019
Estimate the number and type of families that will benefit from the proposed activities	Approximately 6,440 City of Aurora low and moderate income individuals (as well as families) who face challenges such as: Chronic Homelessness Mentally III Chronic Substance Abuse Veterans Persons with HIV/AIDS Victims of Domestic Violence Non-housing Community Development Senior Services
Location Description	Citywide. Specific locations are noted under "Planned Activities" section

Planned Activities	CDBG-2019-03: Breaking Free, Inc. (\$25,000)
	Hesed House Comprehensive Resource Center, 680 S. River St., Aurora, IL 60506
	The provision of substance use disorder screening, assessment and outpatient treatment services provided by Breaking Free Inc. at the Hesed House facility.
	CDBG-2019-04: Mutual Ground (\$50,000)
	418 Oak Avenue, Aurora, IL 60506
	Mutual Ground provides shelter, advocacy, and education to victims of domestic violence and sexual assault.
	CDBG-2019-05: Prairie State Legal (\$12,500)
	1024 W. Main Street, St. Charles, IL 60174
	Legal services to aid low income Aurora residents with rental housing issues that may result in homelessness if not addressed.
	CDBG-2019-06: Public Action Deliver Shelter, Inc. DBA Hesed House (\$25,000)
	659 S. River St., Aurora, IL 60506
	Provide case management to homeless persons.
	CDBG-2019-07: City of Aurora Innovation and Core Services Department (\$50,000)
	44 E. Downer Place, Aurora, IL 60507
	Provide out of school youth between the ages of 18 and 24 with opportunities for career exploration, skills development and job referral in the information technology industry.
	CDBG-2019-08: Senior Services Associates (\$30,000)
	900 N. Lake St., Aurora IL 60506.
Project Name	Neighborhood Revitalization/Improvements

3	Target Area	Neighborhood Revitalization Strategy Area City of Aurora Low-Mod Census Tracts
	Goals Supported	Neighborhood Revitalization/Improvements
	Needs Addressed	Neighborhood Improvements/Revitalization
	Funding	CDBG: \$804,234
	Description	Initiate improvement efforts in locally selected geographical areas that complement City Neighborhood Plans.
	Target Date	12/31/2020
	Estimate the number and type of families that will benefit from the proposed activities	TBD, depending upon LMI Census Tract areas that are selected for construction.
	Location Description	Initiate improvement efforts in locally selected geographical areas that complement the City Neighborhood Plans, especially within the NRSA and LMI Census Tracts. TBD.
	Planned Activities	CDBG-2019-09:
		City of Aurora Engineering Division (\$500,000)
		44 E. Downer Place, Aurora, IL 60507
		Street resurfacing project for streets within low-moderate income census tracts.
		An additional \$304,234 has been allocated for a Neighborhood Revitalization Project TBD at a later date. Once selected, the project will be approved via the City's Substantial Amendment public participation process. Additionally, any unexpended 2018 program administration and public service funds will be allocated to this category.
4	Project Name	Administration (CDBG and HOME)
	Target Area	Neighborhood Revitalization Strategy Area City of Aurora Low-Mod Census Tracts
	Goals Supported	Administration (CDBG/HOME/ESG)
	Needs Addressed	CDBG Administration HOME Program administration

	Funding	CDBG: \$328,317 HOME: \$75,055
	Description	City of Aurora administration of the CDBG and HOME federal programs. (ESG Administration is included under its Homelessness Prevention Project.)
	Target Date	12/31/2019
	Estimate the number and type of families that will benefit from the proposed activities	201,110 citizens (2016 estimate). This shall address community development, affordable rental housing development, and homelessness prevention needs for low to moderate income persons and households throughout the City, although the City may place greater emphasis on those neighborhoods that meet the HUD threshold for low and moderate income areas.
	Location Description	Citywide
	Planned Activities	City of Aurora administration of the CDBG and HOME federal programs which includes coordination with the City's HUD subrecipients, developers, and grantees as well as monitoring, financial recordkeeping, reporting, etc.
5	Project Name	Economic Development: Micro Businesses
	Target Area	Neighborhood Revitalization Strategy Area City of Aurora Low-Mod Census Tracts
	Goals Supported	Economic Development/Micro-Businesses
	Needs Addressed	Economic Development/Micro-Businesses
	Funding	CDBG: \$50,000
	Description	The project's activity will offer micro-loans to Aurora micro- and small business owners.
	Target Date	12/31/2019
	Estimate the number and type of families that will benefit from the proposed activities	5 low and moderate income business owners and/or business owners within LMI census tract areas, with priority given to NRSA business owners.
	Location Description	NRSA and LMI areas within the City of Aurora

	Planned Activities	A forgivable loan program to make micro- and small business forgivable loans between \$5,000 - \$15,000 that support entrepreneurs who may be unable to access traditional financing and who are seeking to establish, stabilize, or expand their business activities within the City's Neighborhood Revitalization Strategy Area (NRSA) or LMI neighborhood. Applicants will be awarded loans on a 90/10 basis, with the applicant required to demonstrate a 10% match. CDBG-2019-10: Invest Aurora (\$50,000) 43 W. Galena Blvd., Aurora, IL 60505.
6	Project Name	Housing: Rental (HOME)
	Target Area	Neighborhood Revitalization Strategy Area City of Aurora
	Goals Supported	Housing/Rental
	Needs Addressed	Housing/Rental
	Funding	HOME: \$562,915
	Description	This project will redevelop or create rental units; replacement units for scattered site housing, elderly, special needs or homeless. The City will work with a developer to provide affordable rental housing for low and moderate income homeowners. HOME funded projects will be determined at a future date and approved via the City's Citizen Participation Plan for Substantial Amendments.
	Target Date	12/31/2018
	Estimate the number and type of families that will benefit from the proposed activities	This project will redevelop or create approximately 12 rental units; replacement units for scattered site housing, elderly, special needs or homeless. The City will work with a developer to develop affordable rental housing for tenants who are at 40-80% of AMI.
	Location Description	City of Aurora
	Planned Activities	HOME funded projects will be determined at a future date and approved via the City's Citizen Participation Plan for Substantial Amendments.
7	Project Name	CHDO Project (HOME)
	Target Area	Neighborhood Revitalization Strategy Area City of Aurora Low-Mod Census Tracts

	Goals Supported	Housing/Rental
	Needs Addressed	Housing/Rental
	Funding	HOME: \$112,583
	Description	The City will work with a Community Housing Development Organization(s) (CHDO) to develop affordable rental housing units. The City will work with a developer to provide affordable rental housing for low and moderate income homeowners. HOME funded projects will be determined at a future date and approved via the City's Citizen Participation Plan for Substantial Amendments.
	Target Date	12/31/2018
	Estimate the number and type of families that will benefit from the proposed activities	Approximately 4 low and moderate income households will benefit from this activity. The City will work with a Community Housing Development Organization to ensure that affordable rental housing is provided for residents whose income levels are at 40-80% of AMI.
	Location Description	CHDO project location(s) will be determined at a future date and approved via the City's Citizen Participation Plan for Substantial Amendments.
	Planned Activities	CHDO projects will be determined at a future date and approved via the City's Citizen Participation Plan for Substantial Amendments.
8	Project Name	Homelessness Prevention: Program Admin and Direct Activities (ESG)
	Target Area	Neighborhood Revitalization Strategy Area City of Aurora Low-Mod Census Tracts
	Goals Supported	Administration (CDBG/HOME/ESG) Homelessness Prevention (ESG)
	Needs Addressed	Public Services/Homelessness
	Funding	ESG: \$136,287
	Description	Selected project activities must relate to street outreach, emergency shelter, homelessness prevention, rapid re-housing, and Homeless management Information System (HMIS) Collection as well as program administration costs (7.5% of allocation = \$10,221). Direct project activities will be approved via the City's Citizen Participation Plan for Substantial amendments.
	Target Date	12/31/2019

	Estimate the number and type of families that will benefit from the proposed activities	TBD
	Location Description	City of Aurora
	Planned Activities	As a new ESG Program recipient, the City is in the process of developing this program to meet HUD's requirements. Project allocations will be recommended via the City's citizen participation process at a future date. Goal outcomes will also be provided at a future date.
9	Project Name	Section 108 Economic Development Loan Pool
	Target Area	Neighborhood Revitalization Strategy Area City of Aurora Low-Mod Census Tracts
	Goals Supported	Economic Development (Section 108)
	Needs Addressed	Economic Development/Small Businesses Economic Development/Micro-Businesses
	Funding	Section 108: \$1,000,000
	Description	On a case-by-case basis, the Section 108 loan funds will be borrowed by the City of Aurora and re-lent to one or more Developers, except in cases where the City serves as the Principal Developer. Under this activity, the Section 108 loan funds may also be loaned to a not-for-profit entity (or subrecipient) who will act as Program Administrator for this program. The Program Administrator will be a private non-profit entity. The City will have a Subrecipient Agreement with the Program Administrator and it will be the responsibility of the Program Administrator to solicit and underwrite loans, manage accounting and reporting, and work with loan clients.
	Target Date	12/31/2020
	Estimate the number and type of families that will benefit from the proposed activities	Low and moderate income families
	Location Description	City of Aurora
	Planned Activities	TBD

10	Project Name	Section 108 Affordable Housing Tax Credit Facilitation Loan Pool
	Target Area	Neighborhood Revitalization Strategy Area City of Aurora Low-Mod Census Tracts
	Goals Supported	Housing/Rental Economic Development (Section 108)
	Needs Addressed	Housing/Rental
	Funding	Section 108: \$1,000,000
	Description	The applicant for the 108 loan funds will be the City of Aurora. The City will borrow and initially re-lend the funds to non-profit and for-profit developers for the purposes of property development, construction, and management of workforce housing development. Each project will have a principal developer and equity will be provided thru Low Income Housing Tax Credits. The City of Aurora may provide either interim construction financing or permanent project financing thru the use of 108 funds. Upon completion of construction, the City will expect a general partnership to own, operate, and manage subject properties. All funds requested for this project will be used to facilitate work force housing for LMI residents as well as permanent supportive housing. Additionally, the funds will be used as bridge/gap financing for low income tax credits.
	Target Date	12/31/2020
	Estimate the number and type of families that will benefit from the proposed activities	Low and moderate income families.
	Location Description	City of Aurora, location TBD.
	Planned Activities	TBD
11	Project Name	Section 108 Public Facilities Loan Pool
	Target Area	Neighborhood Revitalization Strategy Area City of Aurora Low-Mod Census Tracts
	Goals Supported	Neighborhood Revitalization/Improvements
	Needs Addressed	Neighborhood Improvements/Revitalization
	Funding	Section 108: \$1,000,000

Description	The Section 108 loan funds will be borrowed by the City of Aurora and re-lent to one or more Developers, except in cases where the City serves as the developer. The Developer will be a private or a non-profit entity. The City will have a development agreement with the Developer and it will be the responsibility of the Developer to act as, or in some cases, hire the General Contractor. Similarly, all development agreements will contain all necessary requirements related to the disbursal of Section 108 funds within the context of the specific development budget and project.
Target Date	12/31/2020
Estimate the number and type of families that will benefit from the proposed activities	Low and moderate income families.
Location Description	TBD
Planned Activities	TBD

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

Maps of the City's LMI areas and NRSA are included in Attachment 2 (Appendices A and B, respectively) of this Plan.

City of Aurora: LMH, LMI/LC, LMI/J

NRSA: LMH, LMI/LC, LMI/J, LMA

Low to Moderate Income (LMI) Census Tracts: LMH, LMA, LMI/LC, LMI/J

Aurora's LMI Census Tract and Block Groups include the following (tracts above 50% are considered LMI):

TRACT BLKGRP LOWMODPCT

854700 1 50.84%

852907 2 51.11%

853007 3 51.18%

854302 1 51.46%

854301 1 55.25%

854302 3 55.44%

853007 1 55.79%

852905 2 56.00%

853200 2 56.57%

852906 1 57.33%

854100 3 58.00%

854002 5 58.08%

853600 2 58.76%

853500 1 60.29%

846515 3 61.67%

852905 1 61.94%

854400 3 62.20%

853007 2 62.82%

854301 4 63.19%

853300 1 63.35%

853400 5 63.81%

853300 2 63.89%

853400 6 64.58%

Geographic Distribution

854100 2 89.15%

Target Area	Percentage of Funds
Neighborhood Revitalization Strategy Area	3
City of Aurora	100
Low-Mod Census Tracts	49

Table 8 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

The City's HUD funded activities take place city-wide and are based upon client need, some of whom may reside in the City's NRSA. One of the City's 2019 proposed projects specifically targeted to the NRSA. The City's neighborhood revitalization projects focusing on resurfacing roads and TBD are targeted the City's LMI tract areas. Of the City's 2019 allocation, \$804,234 was allocated to this neighborhood revitalization project.

Discussion

The overall mission of the CDBG, HOME and ESG programs is to improve the lives of lower income persons. The City will design and fund program activities to help income qualifying households wherever they live. Some of these programs will focus on the improvement of specific neighborhoods where lower income households live, whereas other programs will be designed and funded to promote greater choice in housing or employment or supportive services opportunities, regardless of location.

Affordable Housing

AP-55 Affordable Housing - 91.220(g)

Introduction

Based on the data included in the HUD tables and available to the City of Aurora, as well as the preferences and observations expressed during the community-wide and stakeholder surveys, the focus groups and the special information interviews, the City has identified these higher priority housing needs for the upcoming 2015 -2019 period:

Existing housing in need of repairs of renovations in order to meet current building codes, lead paint mitigation standards, or greater energy efficiency standards, and owned and occupied by income-eligible households whose housing costs exceed 30% of income. Households between 40% and 80% of median income who are trying to purchase their own homes and contribute to the stabilization of neighborhoods within the city. The City determines household income using the 24 CFR Part 5 definition of annual income (https://www.hudexchange.info/resource/2701/sample-format-for-calculating-part-5-annual-income/). Income-eligible renter households with housing cost burdens greater than 30% of their income, living in housing in need of repairs or renovation in order to meet current building codes, lead paint mitigation standards, or greater energy efficiency standards. Very low-income households at risk of becoming homeless or households who are currently homeless and very mobile within Aurora, and who are proportionately larger users of human services, health care, or emergency.

Additional information regarding the city's effort to address its special populations as it relates to its partnerships with the Aurora Housing Authority and Kane County Continuum of Care are further described in AP-60 and AP-65, respectively.

One Year Goals for the Number of Households to be Supported	
Homeless	0
Non-Homeless	42
Special-Needs	61
Total	103

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

One Year Goals for the Number of Households Supported Through		
Rental Assistance	0	
The Production of New Units	18	
Rehab of Existing Units	85	
Acquisition of Existing Units	0	
Total	103	

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

Discussion

The number of households supported reflects the anticipated affordable homeownership opportunities offered through the City's down payment assistance program. The number also reflects the anticipated number of homes to receive housing rehabilitation assistance through the City's partners, Rebuilding Together Aurora (RTA) and The Neighbor Project. (Because the RTA's CDBG funded program serves only persons with disabilities and/or senior citizen clients, the RTA's proposed 61 units to be rehabilitated have been identified under the special-needs category.)

The one-year goal for the production and/or acquisition of affordable units is generally set at 16, with an additional estimated 2- 4 units to be added via the City's partnership with a CHDO. The City will solicit proposals at a future date and commit HOME funds via the City's Citizen Participation Plan's process.

AP-60 Public Housing — 91.220(h)

Introduction

The Aurora Housing Authority (AHA) provides public housing within the corporate limits of the City of Aurora. The City includes the Aurora Housing Authority (AHA) management in its communication and notification efforts regarding the development of its AAP.

Since the establishment of the City's 2015-2019 Consolidated Plan, the AHA has been involved on housing projects that are more in line with the City's housing policies and housing plans, including the use of Housing Authority funds to leverage private or non-profit partners in tax credit or other publicly financed projects. In fact, most notably in 2015 and in 2016, the AHA provided Project Based Vouchers for two LIHTC projects.

As the Responsible Entity for the AHA's ERRs, the City also performs the environmental review for the AHA's housing projects.

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

Following the conclusion and recommendations of the City's Affordable Housing Task Force in June of 2012, the City immediately began working with the Aurora Housing Authority (AHA) on one of the most well-received housing models explored by the Task Force. This model involved utilizing Low Income Housing Tax Credits (LIHTC) for a development that consisted of scattered-site, single-family units with an option-to-purchase for the low-income residents. This Aurora scattered-site project was completed in 2014 and created 40 affordable rental housing units throughout the City. This LIHTC project, the Aurora Impact Initiative, also known as Fox Prairie Homes Development received partial funding from the City's NSP and HOME Programs. Following the successful completion of this project with project's developer, Brinshore development, the AHA partnered on a second project with the City and the project's developer, Evergreen Realty, on a senior housing affordable rental housing development. HOME funds were committed in December 2015 on this LIHTC project, and the project was completed in May 2017. Forty-four PBVs were provided by the AHA for this project, which created 56 affordable rental units and I four market-rate units. In summer 2016, the City launched efforts to partner with another affordable housing developer, The Community Builders on another LIHTC project. Although the project will not be completed until the close of 2018, the AHA has committed 20 PBVs to this 76 unit project, of which 38 units will be rehabilitated and another 38 will be created for LMI tenants.

Additionally, the AHA's Strategic Plan 2013 - 2018 outlines the following major initiatives for Year 5

(April 2017 to March 2018) to address its public housing needs.

- 2. Social Media Activity (managed social media presence, targeted media marketing tie-in spring 2017)
- 5. Jericho Circle Multi Use Complex (construction phase summer 2017 completion summer 2019)
- 6. Strategic Planning Process (Second 5 year increment plan developed Fall 2017)
- 7. Self Sufficiency/Entrepreneurship Institute (expansion of operation to include venture capital Fall 2017)
- 8. Resident Outcomes Statistical Modeling (full utilization, using programming to determine outcomes, studying results of AHA actions winter 2018)
- 9. Vehicle Replacement (trade in and replacement of Year 2 vehicles)
- 10. Tiered Units (5 scattered site homes, 5 apartments, if feasible 3 tier 4 units)
- 11. Marketing Activity (continuation of all campaigns, emphasis on self-sufficiency).

As always, the City will continue to review partnership opportunities to further enhance the AHA's affordable housing opportunities. For example, during prior program years, the City partnered with the Northern Lights Development Corporation on a Blight Reduction Program (funded through IHDA) wherein blighted properties were demolished and the future intent is to provide affordable rental housing opportunities. Additionally, the City always endeavors to improve the quality of life for the AHA's residents, and includes the AHA's housing projects in its neighborhood needs assessment efforts. For example, the City has provided local funding support for programs that will provide opportunities such as job training and employment for at-risk youth who live within the housing projects.

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

The AHA's Strategic Plan specifically addresses the need to provide a homeownership program by partnering with local banks and other lending institutions to provide refinancing and cost control assistance. Under this Plan, the AHA expresses the intent to provide down payment assistance, credit repair, lending assistance and foreclosure prevention. Additionally, the AHA recognizes the benefit for assisting current homeowners in preventing foreclosure. The AHA's Plan also includes their goals regarding support services for rental assistance, credit, education and family services support. The plan recognizes the need to follow-up with residents to further ensure their self-sufficiency.

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

provided or other assistance

The Aurora Housing Authority has been designated as "troubled". To date, recovery plan efforts are underway between the AHA and HUD to resolve the issues related to the AHA's troubled status. The AHA recently filled its Executive Director position. The City's Chief Community Services Officer has met with the new Executive Director and Board President, and it is the City's understanding that steps are in place to clear the troubled status designation. At this point, there is not a need for the City to provide financial assistance. The City will continue to be available for technical assistance to evaluate options for improving operations, resolving non-compliance problems, and identifying other housing-related needs and issues. When feasible, similar to the City's prior housing development projects with the AHA, the City will seek to reach out to the AHA to partner on future projects. In its continued assessment of the AHA's needs and proposed projects, the City will also review any proposed projects to determine whether or not its HUD funds can be used to assist the AHA in accomplishing its housing goals and objectives.

Discussion

All information regarding AHA's Strategic Plan taken from:

www.auroraha.com/wp-content/uploads/2014/07/Aurora-Housing-Authority-Strategic-Plan-2014-2018.pdf

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

Aurora will continue to be an active participant in the Kane County Continuum of Care and will implement the actions and activities outlined in the Homeless Strategy as written in this Consolidated Plan.

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

Aurora will continue to be an active participant in the Kane County Continuum of Care and will implement the actions and activities outlined in the Continuum's Homeless Strategy. Also, under PY 2019, the City has allocated funding mitigate or prevent homelessness by providing assistance to Breaking Free's Homeless Substance Abuse Treatment Services, Mutual Ground's Emergency Shelter (domestic violence), and Hesed House's SEEDs Homeless Services Management.

Addressing the emergency shelter and transitional housing needs of homeless persons

In addition to its CoC Partnership, the City allocated funding to mitigate or prevent homelessness by providing assistance to Mutual Ground, Breaking Free and the Hesed House SEEDs Homeless Services.

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

Special needs persons will benefit from 2019 funding allocated to Senior Services Associates and Rebuilding Together Aurora for the following programs:

- -Supportive services for the elderly and disabled going to Senior Services Associates.
- -Increase and improve quality of facilities including funding to Rebuilding Together Aurora for home accessibility repairs.

The City will also seek to work with its developers to fulfill the City's rental housing goal to provide affordable housing opportunities for scattered site housing, elderly, special needs, or homeless

residents.

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.

Although not funded under the 2019 Program Year, AID is the primary provider of supportive housing services for individuals returning from mental health facilities and nursing homes. AID, Senior Services, Day One Network and the Department of Rehabilitation Services collaborate to assist those capable of leaving nursing homes, to live with support services in their own homes and apartments. AID is a long-standing HOME CHDO partner and partner in the Aurora Arts Centre Project. AID will provide supportive services for residents living at Coulter Courts.

Discussion

The City will also address homelessness prevention through the use of its ESG funds. Projects are to be determined, pending completion of the City's ESG Program Guidelines and call for applications.

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

Introduction:

In analyzing barriers to affordable housing development, city staff identified five currently known

barriers:

• Market conditions that, in the past, placed upward pressure on housing prices, but over the last

5 years, economic conditions have slowed or halted new development and severely restricted the availability of financial assistance especially to low income households.

- Local processes for land use planning and zoning
- Building codes
- High demand for housing and high cost of housing
- Community resistance to affordable housing including Fair housing issues.

In 2019, the City will continue its first-time homebuyers down payment assistance program, Choose Aurora, which provides forgivable loans in the amount of \$3,000 (to City homebuyers outside of the City's NRSA) or \$5,000 (for NRSA homebuyers).

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

Continue to coordinate housing development within the City across various departments that relate to the development and maintenance of the housing stock.

The City will continue to fund its housing rehabilitation programs which focus on address code compliance and safety upgrades.

All HOME activities will address accessibility to affordable housing through HOME regulations regarding

High and Low HOME rents and long term affordability periods.

Discussion:

Similar to other cities across the country, Aurora continues to balance its housing policies objectives and resources across several competing public goals.

Given the number of existing housing units (47% of the owner-occupied units and 60% of the renter occupied units) built before 1980, the City continues to place an emphasis on the preservation of the existing housing stock within its housing policies. Parallel to this priority, the City has also tried to redevelop older deteriorated areas of the city, especially along the riverfront and near the downtown, with a mixture of new residential and commercial and public uses.

AP-85 Other Actions – 91.220(k)

Introduction:

The following actions will be taken to address obstacles to meeting underserved needs; to foster and maintain affordable housing; to reduce lead-based paint hazards; to reduce the number of poverty-level families; to develop institutional structure; to enhance coordination between public and private housing and social service agencies.

Actions planned to address obstacles to meeting underserved needs

Given the data and input, the City set a high need priority for income levels from 0% - 80% of medium family income, for both renters and owners, and for large-related, small-related, and elderly housing. The City determines household/family income using the 24 CFR Part 5 definition of annual income (https://www.hudexchange.info/resource/2701/sample-format-for-calculating-part-5-annual-income/). The City is unable to address all of these high needs with resources available so focus will occur on the following prioritized needs over the next five years:

Existing housing in need of repairs or renovations to meet current building codes, lead paint mitigation standards, or greater energy efficiency standards, and owned and occupied by income-eligible households whose housing costs exceed 30% of income.

Households between 40% and 80% of median income purchase their own homes and contribute to the stabilization of neighborhoods within the City.

Income-eligible renter households with housing cost burdens greater than 30% of their income, living in housing in need of repairs or renovation in order to meet current building codes, lead paint mitigation standards, or greater energy efficiency standards.

Very low-income households at risk of becoming homeless or households who are currently homeless and very mobile within Aurora, and who are proportionately larger users of human services, health care, or emergency services.

Actions planned to foster and maintain affordable housing

The cost of housing negatively affects low-income residents and their ability to afford and maintain their homes. The City of Aurora is committed to improving the quality of its existing housing stock. The housing activities funded for this program year address the rehabilitation of housing, initiatives to house special needs populations, encourage homeownership, reduce lead-based paint hazards and

improve/provide suitable rental housing, especially for people with special needs.

Actions planned to reduce lead-based paint hazards

As part of the environmental review process, all CDBG direct housing assistance activities address lead based paint hazards. Also, all HOME direct housing assistance activities address lead based paint hazards through the City of Aurora Property and Rehabilitation Standards, which cites compliance with Title X Lead Based Paint Regulations and the Environmental Protection Agency Renovation, Repair and Painting Rule (RRP).

The City has and will continue to work diligently to ensure lead safety when assisting units with lead hazards. All aspects of the lead regulations have been incorporated into the City's program requirements to ensure occupant safety in homes and public facilities which house children (shelters). The City's CDBG funded housing rehabilitation and down payment assistance programs fall under the \$5,000 threshold and presumptions of lead are made. Clients are provided with the EPA's *Protect Your Family from Lead in Your Home* and required to sign that they have received the brochure. Housing rehabilitation contractors are required to have their RRP certification. The City will communicate with subrecipients and monitor all projects to ensure that lead-based paint regulations are implemented correctly in rehabilitation projects. Applicable lead-based paint regulations will be followed for all rehabilitation projects in which the building (housing and public facilities which are child-occupied) was constructed before 1978, including required testing for clearance.

Actions planned to reduce the number of poverty-level families

- Promote and assist with economic development through job creations such as providing assistance to small businesses in neighborhoods, including the NRSA, and micro-business loans.
- Assist families with prerequisites to employment by removing barriers to obtaining employment
 by funding programs/agencies with a record of demonstrated success in running programs such
 as job training and job-readiness.
- Focus efforts to assist under-served populations in their efforts to become self-sufficient.
- Improve, maintain, and increase the amount of affordable housing units within the City by undertaking housing rehabilitation, reconversion and homebuyer assistance programs.

Actions planned to develop institutional structure

The City will continue to develop partnerships that leverage other agencies and organizations, both public and private. We continue to seek out competitive and or stimulus-based funding sources to support Consolidated Plan objectives. Through CDBG, HOME, and ESG, the City collaborates with partners to deliver resources effectively. The City will, for example:

Continue its active role in the Continuum of Care for Kane County, which provides housing and other

forms of shelter for the homeless.

Continue to work with service and housing providers to address the housing needs of the lower- income, mentally ill, and other special needs populations.

Collaborate with housing providers to extend the reach and effectiveness of housing activities.

Continue to work with area stakeholder organizations (including private lenders, the public schools, Invest Aurora, Waubonsee Community College, Aurora University, the City's three Chambers of Commerce, physical and health care institutions, youth services providers and others) in order to develop and implement effective service and revitalization strategies, including the Neighborhood Plans and the Neighborhood Revitalization Strategy Area.

Continue to partner with a number of agencies, businesses, and foundations that have pledged their own money to further the housing and community development objectives outlined in this Plan.

At the current level of activity, this structure is complete and effective. It may not be adequate to accommodate significant increases in the level of participation without additional funds to allow for amplification of the process. The City of Aurora will, of course, continue to search for opportunities to expand the existing structure and make it more effective. The opportunities, given the limited availability of and competition for resources, however, are limited.

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

Throughout the implementation of the Consolidated Plan, the City of Aurora has coordinated with local organizations and entities, including the following:

Kane County Continuum of Care, Waubonsee Community College, Aurora Housing Authority, Ward Committees, Neighborhood and Homeowners' Associations, business groups, Kane County Healthy Places Coalition, Fox Valley United Way, and Family Focus Aurora.

This list will likely expand in the future as the City seeks additional partners with each program or activities that is funded to address the goals and objectives of this Plan. The NRD will continue to consult with housing advocates, social service agencies and other entities on a variety of issues by attending and participating in local and regional meetings/planning groups that deal with issues that affect the City's most vulnerable populations.

Discussion:

In addition to allocating its HUD funds for the City's community development and housing activities, the City also provides local funding assistance through its Quality of Life Grants, Continuum of Care,

Annual Action Plan – Draft (12-2-18)

and Aurora Rapid Rehousing Case Management budget allocations to several social service agencies who provide child care, youth, homelessness prevention, job training, downtown improvement, and public education services.

Program Specific Requirements

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

Introduction:

The following Program Specific Requirements provide information for the City's expected Program Income for 2019 as well as the percentage of CDBG, Section 108, and HOME funds that will be used to benefit low and moderate income residents and to meet the needs of the City's most vulnerable and underserved populations.

Once the City retains consultant services for its Section 108 underwriting activities, the remaining \$3M of its Section 108 Loan Guarantee will be made available for eligible activities related to its economic development, affordable housing, and community facility loan pools.

The City does not anticipate that it will have any urgent need activities. The City's CDBG subrecipient partners are required to meet HUD's minimum 70% LMI benefit. The City's estimated LMI benefit for its 2018 Program Year is based upon an average of the City's prior completed program years (2015-2017).

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	

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.

98.67%

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:
 - HOME allows virtually any form of financial assistance to be provided for eligible projects and to eligible beneficiaries. The participating jurisdiction (PJ), City of Aurora, determines what forms of assistance it will provide. Some forms of assistance will require legal instruments for implementation. HOME regulations list the following forms of assistance as eligible:
- Interest or non-interest bearing loans or advances: These loans are amortizing loans, with or without accruing interest. Repayment is expected on a regular basis so that over a fixed period of time all of the principal and interest is repaid. The term of the loan may vary and the property or some other assets are used as collateral.
- **Deferred Loans (forgivable or repayable):** These loans are not fully amortized. Instead, some, or even all, principal and interest payments are deferred until some point in the future. Deferred loans can be structured in a variety of ways and terms may differ greatly. Deferred payment loans use the property or some other form of collateral as security for repayment.
- **Grants:** Grants are provided with no requirement or expectation of repayment. They require no liens on the property or other assets.
- **Interest Subsidies:** This is usually an up-front discounted payment to a private lender in exchange for a lower interest rate on a loan.
- **Equity Investments:** An investment made in return for a share of ownership. Under this form of subsidy, the PJ acquires a financial stake in the assisted property and is paid a monetary return on the investment if money is left after expenses and loans are paid.
- Loan Guarantees and Loan Guarantee Accounts: HOME funds may be pledged to guarantee loans or to capitalize a loan guarantee account. A loan guarantee or loan guarantee account ensures payment of a loan in case of default.
- 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:

Not applicable as the City's HOME funds are targeted for the development of affordable rental

Annual Action Plan – Draft (12-2-18) 2019 housing units for residents whose incomes are between 40-80% AMI.

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:

HOME assistance to development projects will be given in the form of an amortized, deferred loan or grant. Funding Agreements will establish a minimum affordability period that is typically not less than 5 years but will at minimum meet the HOME guidelines for new construction. Before monies are released an agreement will be signed between City and the recipient. The agreement will satisfy Federal requirements and establishes the terms under which the funding is being provided. Funds will not be released until a funding agreement is executed.

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:

Funds may be used to refinance existing debt on funded rehabilitation properties. The refinancing must be necessary to reduce the owner's overall housing costs to make the housing more affordable.

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

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

The Kane County Continuum of Care (CoC) has written standards for providing assistance under the Emergency Solutions Grant. As an active member of the CoC, one the City receives its 2018 ESG allocation, it plans to use the CoC's written standards as a template for creating its own guidelines for the provision of ESG assistance for its 2018 and 2019 allocations. Because the Kane County CoC receives non-entitlement ESG funds, where applicable, the City's ESG Program will follow HUD's ESG entitlement community requirements. To comply with HUD's ESG entitlement community requirements and to ensure its ESG program administration requirements, the City's written standards will include polices and procedures for: 1) admission, diversion, referral and discharge by emergency shelters, 2) assessing, prioritizing, and reassessing individuals' and families' needs, 3) coordination among emergency shelter providers, and 4) determining and prioritizing which eligible families and individuals will receive homelessness prevention assistance and which ones will receive rapid re-housing assistance. The written standards will also include standards for: 1) evaluating individuals' and families' ESG eligibility, 2) targeting and providing essential services related to street outreach, 3) determining the percentage or amount of rent and utilities costs each program participant must pay, 4) determining how long a particular program participant will be provided with

rental assistance, and 5) determining the type, amount, and duration of housing stabilization and/or relocation services.

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 to achieve the following three assistive elements: preventing people from becoming homeless; diverting people into housing if they are currently applying for shelter; and helping people who become homeless to quickly return to permanent housing. ESG consists of a Homelessness Prevention (HP) component for families and individuals who are at Imminent Risk of Homelessness, Homeless under other Federal Statutes or Fleeing/attempting to flee domestic violence, or those who meet HUD's at risk of homeless criteria. A Rapid Rehousing (RR) component provides assistance to persons who are Literally Homeless and or Fleeing/ attempting to flee domestic violence. Eligible households under HP will be those with extremely low incomes, (below 30% of the Area Median Income (AMI)) who lack resources and support networks for housing and who are homeless or at risk of homelessness. Eligible households under RR include those who are literally homeless.

The CoC's written standards defining the policies and procedures governing each component of the ESG assistance programs are attached as Appendix B. Of note, the Kane County CoC receives ESG non-entitlement funds.

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 City of Aurora is part of the Kane County Continuum of Care. The Continuum has adopted a "No Wrong Door" approach to Coordinated Entry. Persons seeking assistance are able to gain access to an array of housing interventions and services through multiple access points dispersed throughout the Continuum's geographic area. Each entry point utilizes the same assessment approach, employing standardized decision-making protocols for prioritizing services for people who may be experiencing homelessness or are at risk of homelessness. Specialized Access Points have been established to meet the unique needs of people who are or have been a victim of domestic violence, dating violence, sexual assault or stalking.

The first phase of the Coordinated Entry process involves pre-screening for diversion or prevention. This step ensures people receive services that are the most appropriate for them, and wait lists for permanent housing are minimized. Information gathered during the pre-screening is used to evaluate housing needs, detect potential housing barriers and identify families and individuals who can be diverted from homelessness. The diversion strategy prevents homelessness by helping people identify alternative housing options and connecting them to services and financial assistance to help them return to permanent housing. People who are literally homeless are offered a referral to a local emergency shelter. People fleeing domestic violence are offered a referral to a local domestic violence provider.

Annual Action Plan – Draft (12-2-18)

If pre-screen results indicate that a family or individual is appropriate for a housing placement, an assessment of the family or individual must be conducted within 14 days of enrollment into the Coordinated Entry program, utilizing the Vulnerability Index – Service Prioritization Decision Assistance Tool (VI-SPDAT) to prioritize for services. Based on their vulnerability score – low, medium or high – an individual/family is prioritized into categories with corresponding solutions that will connect to mainstream affordable housing, transitional housing, rapid rehousing or permanent supportive housing options.

Entering data into HMIS is a requirement for all coordinated entry access points. This ensures that agencies collaborate effectively and that the homeless population can access services efficiently and quickly. The housing prioritization list will be maintained within HMIS and programs must adhere to HMIS reporting standards set by the Kane County CoC.

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).

On May 31, 2018, the City announced to the CoC Board its intention to make funds available to community and faith-based organizations through a procurement process. In future years it is likely that the ESG allocation process will closely mirror existing processes for CDBG and HOME funding. As a new ESG Program grantee, the City anticipates an approximate 3-6 month for the development an implementation (which includes the Citizen Participation Process for awarding ESG funds) for its ESG program. The City's original goal was to open its ESG funding cycle in January 2019; however, due to the pending receipt of its 2018 ESG funds, this date has been deferred to March 2019. Below are the deliverables and timeline for the City's ESG program development. Following the receipt of all deliverables, the City will launch the selection process for its ESG (sub)recipients for its 2018 funds as well as its anticipated 2019 funds.

Deliverables

- 1. Review the City's Citizen Participation Process to ensure that it meets HUD's ESG program requirements.
- 2. Develop a process for making subawards. This will include the development of an Application for Funding, Application Guidelines, and Scoring Criteria.
- 3. Develop an Emergency Solutions Grant Program Guidebook that outlines the basic requirements of the program for organizations awarded ESG funds by the City.
- 4. Develop all subrecipient forms required for the program including, but not limited to, the following:

- a. Homeless Documentation Forms by Activity (includes Third Party and Self-Declarations)
- b. Chronic Homeless Documentation Forms
- c. Unit Habitability Standards Checklist
- d. Income Eligibility Forms
- e. Household Recertification Forms
- f. Rent Reasonableness Checklist and Certification
- 5. Develop performance standards for evaluating ESG activities carried out by subrecipients including monitoring procedures and related checklists needed to document compliance with HUD and the City's contract requirements.
- 6. Review the written standards as adopted by the Kane County CoC and the development of any required additional language to be added specific to the ESG Program for the City to adopt.
- 7. Draft an ESG agreement to obligate grant funds
- 8. Create a rental agreement for ESG funded Rapid Rehousing activities
- 9. Write a lease addendum to comply with the Violence Against Women Act (VAWA)

Timeline (Estimate)

Mid-January 2019 - all policies, forms and documents required for the City's ESG subaward application process will be available for use. Exact delivery date to be negotiated with the City to match application process deadlines.

Mid-February 2019 - all deliverables completed. Exact delivery date to be negotiated with the City to match subawards process deadlines.

March 2019 – Begin application cycle.

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 City is in the process of updating its citizen participation policies to require that the panel that allocates ESG funding to local projects includes at least one homeless or formerly homeless person.

Annual Action Plan – Draft (12-2-18)

The City's ESG Citizen Participation Plan, now under development, will require that locations where copies of completed, proposed Consolidated Plans and Annual Action Plans may be examined will include local homeless service organizations.

As part of its public participation process, the City will address the requirements of 24 CFR 576.405(a) by reaching out to its local homeless service organizations to assess whether or not their board of directors membership includes at least one homeless individual or formerly homeless individual. If this HUD ESG criterion is not met by any of the City's local homeless service organizations, the City will instead follow 24 CFR 576.405(b) by working with its homeless service organizations to develop and implement a plan to consult with homeless or formerly homeless individuals in its ESG policy and decision-making regarding projects/activities that receive ESG funding. It is expected that the City will work closely with its homeless service agencies to develop this plan should it be required. It is anticipated that this outreach process will begin in January 2019, following the completion of the City's ESG program development effort.

5. Describe performance standards for evaluating ESG.

The CoC has developed evaluation criteria that allows it to analyze the degree to which individual projects improve the CoC's ability to respond to homelessness within the geographic region. It is the intent of the City of Aurora to adopt similar performance metrics to evaluate its ESG recipients. This brings to focus viewing the local homeless response as a coordinated system of homeless assistance options as opposed to homeless assistance programs and funding sources that operate independently in a community. The performance measures will examine and evaluate ESG funded emergency shelter, prevention and rapid rehousing services projects using the following criteria:

The length of time individuals and families remain homeless

- The extent to which individuals and families who exit homelessness to permanent housing destinations return to homelessness
- 2. Reduction in the number of homeless individuals and families
- 3. Success at reducing the number of individuals and families who become homeless for the first time to ensure the data required to evaluate agency performance is available, all ESG programs (except domestic violence providers) must adhere to HMIS reporting standards set by the CoC.

The minimum amount of HOME funds that must be invested in any project is \$1,000 for every assisted unit in the project. The minimum relates only to HOME funds, not to any other funds, including match that might be used for project costs. The minimum amount does not apply to tenant based rental assistance. City of Aurora HOME Policies and Procedures: October 2013.

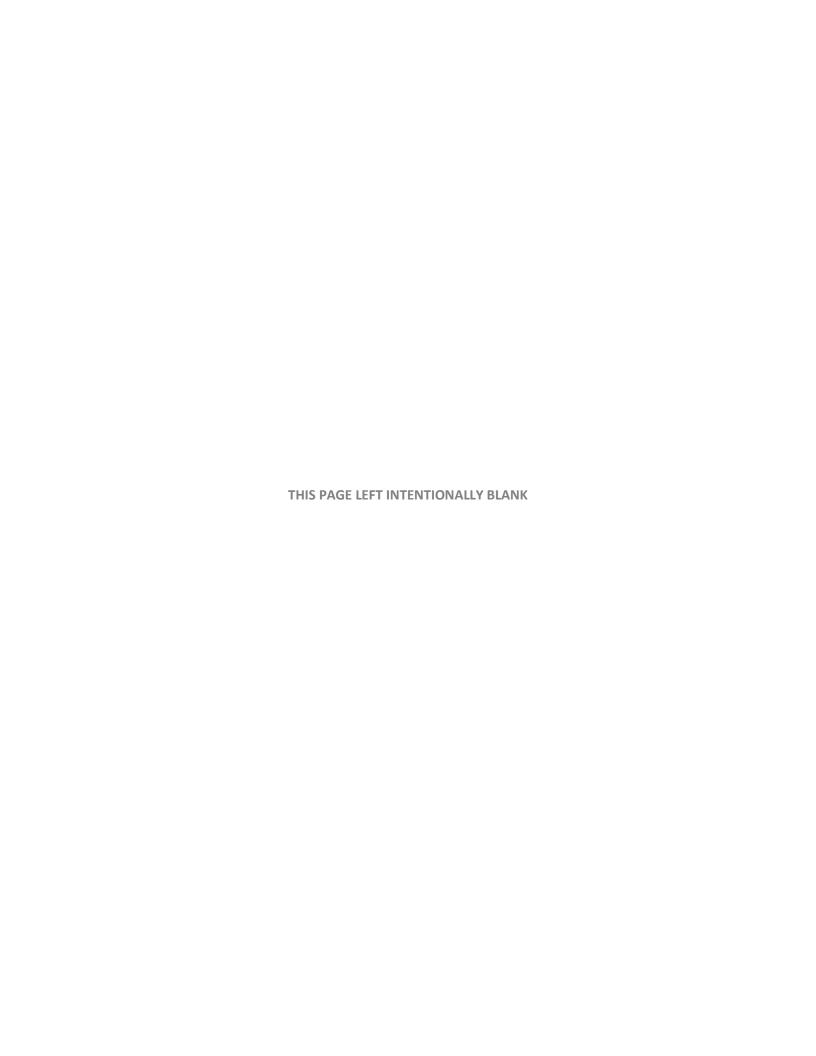
If a project has multiple funding sources, an evaluation must be made to ensure that the HOME funds, in combination with all other funds, do not exceed what is necessary to provide affordable housing. This is generally referred to as the "subsidy layering review". PJs must conduct a subsidy layering review prior

Annual Action Plan – Draft (12-2-18)

to the award of any funds. The City will evaluate the reasonableness and need for the requested assistance by analyzing pro-formas for cash flow, debt-coverage ratios, and the appropriateness of fees charges with and without the HOME funds.

Match Requirements:

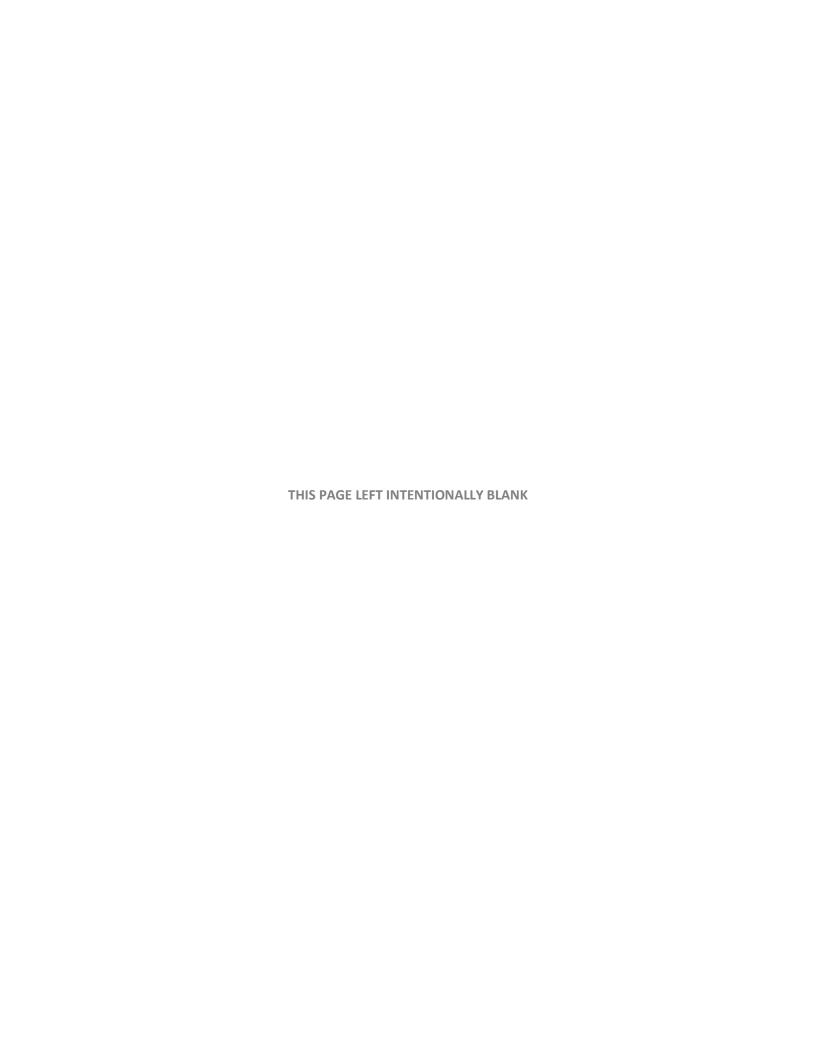
The HOME program requires participating jurisdictions to have a match of at least 25%. Sources of match can be cash, donated land or real property, infrastructures improvements, bonds issued by state or local government, donated materials, equipment, or professional services, sweat equity, and the value of foregone taxes. The City of Aurora will satisfy HUD's 25% match requirements by relying upon either its sponsor/developer's demonstration of a 25% match or its HOME banked resources.



City of Aurora Draft 2019 Annual Action Plan

ATTACHMENTS

- 1. Citizen Participation Comments
 - AP-10, Consultation
 Additional Citizen Participation Comments To be added in final version
- 2. Grantee Unique Appendices
 - Appendix A Kane County Continuum of Care ESG Program Manual
 - Appendix B City of Aurora Low and Moderate Income Map Census Tract and Block Groups
 - Appendix C City of Aurora Neighborhood Revitalization Strategy Area Map
- 3. Grantee SF-424's and Certification(s) To be added in final version



City of Aurora Draft 2019 Annual Action Plan

ATTACHMENT 1

AP-10, Consultation

Additional Citizen Participation Comments To be added in final version

PUBLIC NOTICE

In preparation for the City of Aurora's 2019 Community Development Block Grant (CDBG/ HOME/ESG) funding cycle, a MANDATORY pre-application workshop will be held on Friday, August 10, 2018, 10:00 A.M. at the Aurora City Hall, Council Chambers (2nd Floor), 44 E. Downer Place, Aurora, IL 60507. The workshop will review eligibility for CDBG activities, agency capacity requirements, and the application/funding process. The application submittal deadline is Friday, September 21, 2018 at 4:00 p.m. for funding under the CDBG program. Application forms and instructions will be available starting August 10, 2018 on the City's website: www.aurora-il.org/1175/Neighborhood-Redevelopment under the "Documents" section (which can also be accessed by navigating to the "Neighborhood Redevelopment" page under the "Resident Resources" tab of the City of Aurora's website), in hard-copy at the Neighborhood Redevelopment Division office at 51 E. Galena Blvd, or by emailing nrd@aurora-il.org.

PUBLIC NOTICE

Annual Action Plan Substantial Amendments (2018-#4)

As an entitlement community, the City of Aurora, Illinois ("City") receives funding from U.S. Department of Housing and Urban Development (HUD) through the Community Development Block Grant Program (CDBG), HOME (HOME) Investment Partnerships Program, and Emergency Solutions Grant (ESG) Program, and Emergency Solutions Grant (ESG) Program, and Emergency Solutions Grant (ESG) Program, in accordance with the City of Aurora's Citizen Participation Plan and the requirements of HUD, a public hearing will be held at 5:00 p.m. on December 17, 2018, City Hall, Council Chambers, 2nd Floor, 44 E. Downer Place, Aurora, IL 60507 to provide an opportunity for comment on proposed Substantial Amendments to the City of Aurora's 2014, 2015, 2017, and 2018 Annual Action Plans. The Substantial Amendments will result in the re/allocation of unexpended fund and adjustments needed to ensure the integrity of the City's spending obligations and also further address the City's effort to comply with HUD's regulatory requirements in administering the City's CDBG Program.

To further assist the City in increasing its CDBG spending timeliness ratio and to provide the below agencies with earlier access to funds to better meet their capital improvement and/or clientale needs, the City proposes to reprogram over \$419,542 from prior year projects that have either been cancelled or have unexpended funds as follows:

Proposed New or Amended CDBG Activity	Recommended Re/Allocation Amount	CDBG Program Year Funding Source	Original Funding Allocation	Project Reallocation Comments
		2014 Waubonsee Community College	\$41,691.59	Project cancelled
2018 PAOS Inc. DBA Hesed House HVAC Installation (New)	\$80,689.00	2018 Mational Lalino Education Institute Community Employment Services	\$20,000.00	Project cancelled
		2018 Economic Development Project To be determined (TBO)	\$150,000.00	Unexpended funds
2018 Seize the Future DBA Invest Autora Micro- Enterprise Program	\$50,000.00	2018 Economic Development Project T80	\$150,000.00	Unexpended funds
2018 City of Aurora Engineering Division – Street Resurfacing Program	\$188,853,17	2018 Public Facilities Project TBD	\$181,570.85	Unexpended funds
2018 City of Aurora Public Works Lead Hazard Reduction Program (New)	\$50,000.00	2018 Public Facilities Project TBD	\$181.570.85	Unexpended funds
		2018 Economic Development Project TBD	\$150,000,00	Unexpended funds
2018 Choose Aurora Down Payment Assistance	\$20,000.00	2018 Economic Developmen! Project TBD	\$150,000.00	Unexpended funds
2017 Fox Valley Habitation Humanity Home Ownership	\$50,000.00	2015 Fox Valley Habitat for Humanity - Home Ownership Project	\$26.279.73	Unexpended funds
Project		2018 Economic Development Project TBD	\$150,000.00	Unexpended funds
2019 Neighborhood		2018 Public Service Project Funds	\$184,379.00	Unexpended funds
Revitalization TBD Project	TBD*	2018 Program Administration	\$328,317.00	Program Income Used/ Unexpended funds
Estimated Reallocation Total	\$419,542.17	Per HUD regulatory requirem and program administration to for similar activities. Any unexp Neighborhood flevitalization Pro CD8G Progra	nds may not be ended funds will	carried over into 2019 the reprogrammed for a ng the close of the City's

Please be advised that effective December 2, 2018, the proposed Substantial Amendments to the City of Aurora's 2014, 2015, 2017, and 2018 Annual Action Pleas will be available for review and public comment at the following locations: City of Aurora-Neighborhood Redevelopment, 51 E. Galena Bivd, Aurora, IL; Library-Main, 101 S. River St., Aurora, IL; Library-Eola, 555 S. Eola Rd, Aurora, IL; Library-West, 233 S. Constitution Dr., Aurora, IL; and on the City of Aurora website: https://www.aurora-il.org/1175/Neighborhood-Redevelopment.

Upon advance request, the City will provide for translation services to meet the needs of non-English speaking residents. The City will also take whatever actions are appropriate to serve the needs of persons with disabilities. For more information, to make special arrangements, or to provide comments, contact Neighborhood Redevelopment Division, 51 E. Galena Bivd, (630) 256-3320 or dnr@aurora-il.org. Comments are being accepted no later than January 22, 2019. The Substantial Amendment is scheduled for review and adoption at the City Council's January 22, 2019 meeting at 6:00 p.m., Council Chambers, 2nd Floor, City Hall, 44 E. Downer Place, Aurora, IL 60507.

PUBLIC NOTICE

As an entitlement community, the City of Aurora, Illinois receives funding through the Community Development Block Grant Program (COBG) and HOME Investment Parinerships Program (HOME) from the U.S. Department of Housing and Urban Development, in accordance with the City of Aurora's Citizen Participation Plan and the requirements of the U.S. Department of Housing and Urban Development (HUD), a public hearing is being held at 5:00 p.m. on December 17, 2018 at City Hall, 44 E. Downer Rec, Council Chambers, 2** Floor to provide the public an opportunity to comment on the 2019 City of Aurora Annual Action Plan and proposed funding recommendations of the Bock Clant Moking Committee as quitifued below.

Please be advised that effective December 2, 2016, the 2019 City of Aurora Annual Action Plan will be available for review and public comments at the following locations: City of Aurora-Beighborhood Redevelopment, 51 E. Galena Bivd, Aurora, II.; Library-Main, 101 S. River St., Aurora, II.; Library-Fola, 555 S. Eola Rd., Aurora, II.; Library-West, 233 S. Constitution Dr., Aurora, III.; and on the City of Aurora website: https://www.eurora-II.org/1175/keighborhood-Redevelopment.

Upon advance request, the City will provide for interpretation or translation services to meet the needs of non-English speaking residents. The City will also take whatever actions are appropriate to serve the needs of persons with disabilities. For more information, to make special arrangements, or to provide comments, contact the Neighborhood Redevelopment Division, 51 E. Galena Blvd, (630) 256-3320 or DIRROJUM-11-org.

Comments are being accepted no later than January 22, 2019. The City of Aurora Annual Action Plan 2019 is scheduled for review and adoption at the City Council's January 22, 2019 meeting at 6:00 p.m., Council Chambers, 2° Floor, City Hall, 44 E. Downer Place, Aurora, IL 60507.

Place, Aurora, IL 60507.			
Antoipe: Anticipe Prior Year Estimated		ution: \$750,553.00 ion: \$135,287.00 is: \$3,000,000.00* urces: \$419,542.17*	
	ity Development Blo	ck Grant Program	
I. PUBLIC SERVICES			2019 Recommendation
Breaking Free, Inc.	Homeless Substanc	e Abuse Treatment Services	\$40,000
City of Aurora Innovation & Core Services Dept.	Aurora Youth Ca	reer Pathways Initiative	\$50,000
Mutual Ground	Domestic Viol	ence Shelter Program	\$50,000
Prairie State Legal	Aurora Housing Adv	ocacy Legal Services Project	\$12,500
Public Action Deliver Sheller, Inc. DBA Hesed House	PADS' SEEDS Ca	se Management Program	\$25,600
Senior Services Associates Inc.	Community Con	nection Center Services	\$30,000
PUBLIC SERVICES TOTAL (Cannol exceed 15%	of CDBG Allocation)		\$207,500
II. PROJECTS			2019 Recommendation
City of Aurora Engineering Division	Street Res	orfacing Program	\$500,000
Seize the Future DBA Invest Aurora	Micro-Enter	prise Loan Program	\$50,000
Rebuilding Together Aurora, Inc.	Safe at Homa		\$136,532
The Joseph Corporation DBA The Neighbor Project	Safety First		\$115,000
Neighborhood Revitalization	To be determined		\$304,234
		PROJECTS TOTAL	\$1,105,766
III. ADMINISTRATION (Cannot exceed 20% of C	DBG Allocation)		\$328,317
		GRAND TOTAL	\$1,641,583
HOME Investment Partnerships Program Gran			
. PROJECTS			ggen Barrers det
Direct Housing Project Allocation	W.	··· - · · · · · · · · · · · · · · · · ·	2019 Recommendation \$562,915
Community Housing Development Organization S least 15% of HOME allocation	Pi-Aside (Must be at	To be determined*	\$112,583
		PROJECTS TOTAL	\$675,498
I. ADMINISTRATION (Cannot exceed 10% of HO	ME allocation)		\$75,055
		GRAND TOTAL	\$750,553
	Emergency Solution	s Grant	
Street Outreach		 	
mergency Sheller			1
formelessness Prevention		To be determined	\$126,065
tapid Re-Housing		in ne nesembles	3120,005
lomeless Management Information System (HMI	S) Data Collection		\
		PROJECTS TOTAL	\$126,065
I. ADMINISTRATION (Cannot exceed 7.5% of ES	Gallocation)		\$10,222

GRAND TOTAL

\$136,267

As per 24 CFR 570, 200(th), 24 CFR Part 92,212, and 2 CFR 200,458, the public is hereby notified that under certain conditions, the City and/or its subrecipients may incur costs associated with the CDBG, NOME, and ESG activities identified above and described in the City's 2019 Annual Action Plan prior to the effective date of its grant agreement with HUD. The total amount of any pre-award costs incurred will not exceed 25% of the amount of the City's anticipated 2019 CDBG aflocation. Costs related to the ESG program may not exceed 25% of the City's current program amount. Costs related to the ESG program will comply with the reguled program will be incompliance with the reguled power the CDBG, NOME, and ESG Programs as stated at 24 CFR Part 570, 24 CFR 92, and 24 CFR Part 570, respectively, as well as the Environmental Review Procedures stated in 24 CFR Part 53 to provide the required public disciouser of the City's intent to use unobligated carry forward funds as necessary for such 2019 pre-award costs, the regulatory provisions for incurring pre-award costs will be discissed at the public hearing. This may include using unobligated front lunding for CDBG public service, program administration, neighborhood revibilization/infestructure, and housing activity costs as well as HOME and SCB diministration aproject costs. Questions should be directed to the Reighborhood Redevelopment Division at (630) 256-3320 or DNR@aurora-il.org.

Once selected, specific CDBG. HOME, ESG, and Section 108 project allocations will follow the City's Citizen Participation Plan for Substantial Amendments.

Reports

U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT

Skip Top Navigation

Grant

IDIS 11.16.0 PROD 35498@3816 (DB 11.16.0 317@PROD4376)

Admin

ATTACHMENT 1

Grantee/PJ



Community Development Systems

Integrated Disbursement & Information System (IDIS)

User: B55431 Role: Grantee Organization: AURORA

Switch Profile Logout

Activity

Add Search Search HOME/HTF

CDBG Cancellation

Proiect

Add Search

Сору

Consolidated Plans

- Copy - Search

Annual Action Plans - Add

Copy Search

Consolidated Annual Performance

Evaluation Report Add Search

Utilities

Home

- Data Downloads - Print Page

Help

Contact Support

Rules of Behavior

CPD Home HUD Home

Plans/Projects/Activities Funding/Drawdown

You have 3 CDBG activities that have been flagged. Click on the number to go to the review page.

Annual Action Plans

AP-10 Consultation - 91.100, 91.200(b), 91.215(l)

Save | Save and Return | Cancel

Introduction:

The City's 2019 Annual Action Plan (AAP) was prepared by its Neighborhood Redevelopment Division. As the lead agency, the City of Aurora's Neighborhood Redevelopment Division (NRD) is responsible for carrying out activities to meet priority needs. The City followed its Citizen Participation Plan in announcing its 2019 AAP funding cycle as well as its 2019 draft AAP.

The City announced its pre-application CDBG workshop on July 2, 2018. The mandatory workshop for potential 2019 applicants was held on August 10, 2018. At that time, in addition to presenting the City's anticipated CDBG allocations, the City also presented its intentions for its HOME

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 makes an effort to communicate and carry on a dialogue with service providers and the community-at-large about the Consolidated Plan goals, objectives, and activities to support the current Plan. In addition, staff from the Mayor's office participates in a variety of non-profit roundtables and coordinating meetings to identify needs for service and investment within the community.

Enhanced coordination efforts have demonstrated recent success in the City's HOME funded senior living center project which was completed in May 2017 which included 44 Project Based Vouchers (PBV) and partnerships with numerous entities including Evergreen Realty (affordable housing

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 of Aurora is an active participant in the Kane County Continuum of Care (CoC) system and is one of three local governments that provide non-federal funding on an annual basis to administratively support the CoC. As an active part of the CoC, the City has been a substantial force to promote better outreach, case management, and planning to address homeless issues in the City.

Hesed House, the largest homeless services provider in the City, is located in a former municipal building. This building was converted into a full service homeless facility through the use of City funds. Hesed House has become the second largest homeless shelter in the State of Illinois and

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

The City will continue to work closely with the CoC and HUD field office to define requirements for allocating ESG funds for eligible activities to best meet the needs of people in the City. To date, the City has not received its 2018 ESG allocation. As a result, the City has been unable to move forward in engaging the services of a consultant to develop performance standards and evaluate outcomes, and will help to develop funding, policies, and procedures for the operation and administration of the HMIS, all of which will be developed to complement the CoC's goals, objectives, and priority needs. Once the City receives its release of HUD funds, it will begin the development of its ESG Program immediately.

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

Sort	Agency/Group/Organization*	Agency/Group/Organization Type*	What section of the Plan was addressed by Consultation?*	Action
1	Select Organization		☐ 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 ☐ HOPWA Strategy ☐ Market Analysis ☐ Economic Development	Delete

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		Services-Employment Service-Fair Housing Services - Victims Health Agency Child Welfare Agency Dublicly Funded Institution/System of Care Other government - Federal Other government - County Other government - Local Regional organization Planning organization Planning organization Business Leaders Civic Leaders Business and Civic Leaders Other Optional Designation(s) Community Development Financial Institution Foundation Grantee Department Major Employer Neighborhood Organization Private Sector Banking / Financing	□ Lead-based Paint Strategy □ Anti-poverty Strategy □ Other	
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	☐ Services-Education ☐ Services-Employment	☑ Economic Development ☐ Lead-based Paint Strategy	
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City of Aurora Draft 2019 Annual Action Plan

ATTACHMENT 2

Grantee Unique Appendices

Appendix A - Kane County Continuum of Care ESG Program Manual

Appendix B - City of Aurora Low and Moderate Income Map – Census Tract and Block Groups

Appendix C – City of Aurora Neighborhood Revitalization Strategy Area Map





Rapid Re-Housing, Homeless Prevention, and Emergency Solutions Grant Program Plan

TABLE OF CONTENTS

Iomelessness Assistance through the ESG Program	3
onsistent Procedures and Practices	4
Outreach & Coordination of Services	4
ligible Supports for Emergency Solutions Grant	4
Procedural Guidance	4
Tenant Based Rental Assistance	5
Short-term Assistance:	6
Medium-term Assistance	6
Rent Arrears	
Late Payment Fees	
Housing Relocation & Stabilization Services (HRSS)	7
Financial Assistance	
Rental Application Fee	
Security Deposit	7
Last Month's Rent	
Utility Deposits, Utility Payment and Arrearage Assistance	7
Moving & Storage Costs	8
Stabilization Services	
Housing Search and Placement	8
Case Management	9
Mediation	<u>c</u>
Credit Repair	
Legal Services	
Petermining & Documenting ESG Eligibility	9
Eligibility Criteria	

1

Homeless Prevention Rapid Re-Housing All Households

Guidance for Determining & Documenting Housing Options, Resources & Supp	oort Networks 11
Financial Resources	
Assets	
Social Support Networks	
Non-Duplication	12
Non-Selection/Non-Continuation (Initial/Continuing Eligibility)	13
Separation Guidelines	13
Eligible Units	14
Fair Market Rent Limits and the Rent Reasonableness Standard	14
Minimum Habitability Standard	14
Lease Requirements	15
Rental Assistance Agreement	
HMIS Standards	15
Tracking Services and Outcomes	16
Non-Discrimination and Equal Access Policy	17
Client Confidentiality	17
Recordkeeping Requirement	17
Record Retention Period	17
Reporting Requirements	18
Monitoring	18

Kane County Homelessness Prevention Program:

Homelessness Prevention Emergency Solutions Grant Program Plan

This document provides a summary of the U.S. Department of Housing and Urban Development (HUD) Emergency Solution Grant (ESG) rules and agreed upon procedural guidelines for program implementation in Kane County, Illinois. The ESG Program was established through S.896 HEARTH Act of 2009. The intent of this document is to provide a framework through which Emergency Solutions Grant (ESG) funds will be used in Kane County. This document, in no manner, should be seen as an alternative to or replacement of HUD rules and guidance which can be found at www.hudhre.info. This website is updated regularly by HUD and it is the responsibility of each Sub-Grantee to keep apprised of any and all new and revised guidance. Community Planning and Development (CPD) listservs help stakeholders stay informed about programs, competitions, awards, policy updates and more. Sign up for the CPD listserv and select the topics for which you would like to receive more information.

Homelessness Assistance through the ESG Program

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 for Emergency Solutions Grant) to achieve the following three assistive elements: preventing people from becoming homeless; diverting people into housing if they are currently applying for shelter; and helping people who become homeless to quickly return to permanent housing.

ESG consists of a Homelessness Prevention (HP) component for those who meet homeless criteria categories 2 (Imminent Risk of Homelessness), 3 (Homeless under other Federal Statutes), 4 (Fleeing/attempting to flee domestic violence), or those who meet HUD's at risk of homeless criteria and a Rapid Re-housing (RRH) component for those who meet homeless criteria categories 1 (Literally Homeless) and 4 (Fleeing/attempting to flee domestic violence).

Eligible households under HP will be those with extremely low incomes, (below 30% of the Area Median Income (AMI)) who lack resources and support networks for housing and who are homeless or at risk of homelessness. Eligible households under RR include those who are literally homeless (see Homeless Definition for categories of homelessness). Participating households must agree to allow household demographic and service information to be shared between the participating agencies of the Kane County Continuum of Care (CoC). Agencies will enter client level information into the Kane County's Homeless Management Information System (HMIS) (See HMIS Standards). Participating households must complete a case management assessment to determine eligibility and to develop goals toward housing stability. Agreeing to and participating toward achieving these goals are requirements of both single time and continued assistance. Goals may be outlined in a Housing Stability Plan. The Kane County CoC will target households that have a demonstrated housing crisis, and that are likely to remain stably housed after this assistance. Financial eligibility must be re-assessed every 90 days (or less) for all HP participating households and annually (or less) for RRH participating households (See Eligibility Criteria). 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. ESG assistance is intended to stabilize housing. Maximum assistance under this program is 24 months in any 3-year period.

Consistent Procedures and Practices

ESG providers agree to actively participate in the Kane County Continuum and to follow this plan and all HUD rules, to make certain that households meet the eligibility criteria of the program, to eliminate duplication, and to ensure seamless homelessness prevention coverage in the county. All ESG providers must enter client and service level data into the HMIS system in accordance with HUD rules, operating standards set by the Kane Continuum of Care (CoC) and confidentiality laws. (See Confidentiality & HMIS Standards)

All eligible supports are outlined in the <u>ESG Notice 24 CFR Parts 91 and 576</u> (dated December 5, 2011, effective January 4, 2012). These supports are intentionally focused on housing: financial assistance to help pay for housing services designed to keep people in housing, or services to locate housing. Kane ESG provider agencies are required to follow the ESG Notice, HUD's guidance, and the policies and procedure's within this program plan. An agency may not develop more strict guidelines for screening eligibility and service provision without approval of the Kane County CoC.

Outreach & Coordination of Services

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

Agency providers will comply with all Fair Housing and Civil Rights requirements.

The Kane County CoC has developed a Coordinated Entry System (CES) with policies and procedures as of December 22, 2017. Per HUD guidelines, , all ESG-funded provider agencies are required to use the CES to ensure that housing assistance is prioritized based on vulnerability and severity of assistance needs.

Eligible Supports for Emergency Solutions Grant

Procedural Guidance

- ESG will only provide assistance to households residing in, homeless within or moving to Kane County. However, if necessary and reasonable, Kane County residents may be eligible for assistance to relocate across county or state lines, if necessary, to stabilize the household. If a provider decides to help a participant relocate, the provider retains the responsibility for ensuring all program requirements are met.
- 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 program. There are two cost types: Tenant Based Rental Assistance (TBRA) (includes arrears, short and medium term rent) and Housing Relocation and Stabilization Services (Includes: Moving costs, rental application feels, security deposit, last month's

rent, utility deposit and utility payment). Eligible households may be served using these two cost types in the categories of Homelessness Prevention (HP) assistance or Rapid Re-Housing (RRH) assistance. If a participant is receiving rental assistance under another program, ESG funds may not be used for rental assistance during that same time period. However, it 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 that will assist with monthly rent may receive security deposit assistance through ESG funds. If a participant is receiving utility assistance under another program, ESG funds may not be used for utility assistance during that same time period. For example, a household receiving low income home energy assistance program (LIHEAP) may not receive monthly utility assistance.
- 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 (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.
- Rent may not exceed Fair Market Rents (FMR) for that unit size AND must meet rent reasonableness standards for that specific unit (see Fair Market Rent Limits and the Rent Reasonableness Standard).
- o Total rent assistance is not to exceed 24 months in any 3-year period.
- Other ESG assistance must also be reasonable. ESG documentation should demonstrate that the ESG provider completed due diligence to ensure reasonable costs.
- Financial assistance under ESG HPRR is provided to the landlord or other end user. 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 Homelessness Prevention and Rapid Re-Housing must
 be tracked independently of each other. ESG funds provided via the State of Illinois must be
 tracked separately from ESG funds received by the County. Finally, funds must be tracked
 separately by grant Fiscal Year.

Tenant Based Rental Assistance

HUD advises that ESG assistance should be "need-based", meaning that providing agencies should determine the amount of assistance based on the amount necessary to prevent the program participant from becoming homeless or returning to homelessness in the near future. In no case is the ESG assistance provided to exceed 24 months in any 3-year period.

The goals for housing stabilization set by the case managers with the adult household members will include an assessment of income, expenses and the basic necessities required to maintain housing and stability. A budget will be developed and agreed upon prior to the approval of rental assistance. If ongoing rent assistance is projected, the budget will be monitored by the case manager. Rent assistance may be planned and approved in advance, but approvals are not to exceed the 90 day eligibility period for households receiving HP or one-year for households receiving RRH assistance. Rent payments to the landlord will not be paid significantly in advance.

To ensure a consistent application of standards in determining rent amounts for ESG participating households the ESG provider will be responsible for determining and communicating the amount of rent to be provided, as well as empowering the participating household to assume graduating levels of financial responsibility. All ESG Providers will determine assistance based on identified variables, including income, rent, other financial issues, etc. Client rental payment for tenant based rent assistance will be determined based on the amount of assistance required to meet their monthly expenses (i.e. total monthly income (-) minus total monthly expenses monthly = rent assistance amount). A lesser amount of rent may be required of the client in accordance with the program plan (such as establishing savings for housing stability or planned debt payments - i.e., client has a garnishment, pay day loan, huge child support arrearage or is working with legal or credit repair for debt reduction, etc.). With the exception of rental arrears, no court or legal fees may be paid with ESG funds. See Late Payment of Legal Fees.

ESG providers will obtain new income verification for the household as planned on a quarterly or annual basis. All households must meet income and risk criteria for continued assistance. The family's rent portion will be recalculated accordingly and will be reflected in the assistance. Agencies have the option of reviewing income and rent assistance prior to the planned reevaluation date when such a reevaluation would impact assistance needed for housing stability.

Agencies will provide assistance with the expectation that households will be able to sustain housing independently in the foreseeable future. Tenant Based Rental Assistance (TBRA) is available to both HP and RRH households. It consists of the following cost types:

Short-term Assistance:

Short-term assistance is provided for up to a maximum of 3 months. A housing stability plan will be developed with the household with the expectation that the household will be stable after assistance. A household that initially qualifies for short-term (1-3 months) assistance can transition into medium term assistance at the discretion of the case manager.

Medium-term Assistance

Medium-term assistance can be provided from 4 months up to a maximum of 24 months within a 36 month period.

Rent Arrears

Rent arrearage assistance is not to exceed a one-time payment of up to 6 months. Rent arrearage is counted toward the 24 month maximum. 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 funds cannot be used to pay for rental arrearage assistance in which there was no written lease in place at the time unless an oral lease is enforceable by State law.

Late Payment Fees

Payment of late fees is only allowed with one-time rent arrears assistance.

Housing Relocation & Stabilization Services (HRSS)

Housing Relocation and Stabilization Services consist of Financial Assistance and Stabilization Services and are available to both HP and RRH households.

Financial Assistance

Eligible financial assistance costs covered under housing relocation & stabilization services are listed below (HRSS):

Rental Application Fee

ESG providers may assist program participants with rental applications fees as long as they are only fees charged by the property owner/manager to all applicants.

Security Deposit

There is no expectation that security deposits be returned to the ESG provider agency. Security deposits may be used for damages as defined in the lease or returned to the tenant for use on the next unit should the tenant move in the future. 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. Per HUD guidelines, ESG provider agencies will only provide the equivalent of 2 months' rent maximum for security deposit to eligible households. Exceptions are not allowed.

Last month's rent

If necessary, an ESG provider agency may assist with the last month's rent payment at the time the owner is paid the security deposit and first month's rent. The payment must not exceed one month's rent.

Utility Deposits

There is no expectation that utility deposits be returned to the ESG provider agency. ESG provider agencies may only assist program participants with the standard deposit required by utility companies for gas, electric, water and sewage service.

Utility Payment and Arrearage Assistance

ESG agencies will only provide eligible individuals or households with up to 24 months of utility payments within any 3-year period, including up to 6 months of arrears per service, 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, sewer, and garbage collection services; not phone or cable. As with rent assistance, utility 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 or state subsidy program (LIHEAP). When assisting with utility arrearages, ESG provider agencies must complete due diligence to determine monthly costs and document the method used. To receive assistance with utility deposit or utility arrearage, household must show, in addition to imminent risk or homelessness, valid disconnect notice or proof that utilities will be disconnected or not be connected without assistance.

Moving & Storage Costs

Reasonable moving costs, such as truck rental, hiring a moving company, or temporary storage fees can only be provided to eligible households for a maximum of 3 months, provided that fees are accrued after participant is deemed eligible and before the participant moves into permanent housing. Payment of temporary storage fees in arrears are not eligible. ESG agencies must ensure moving costs are reasonable and document the due diligence in finding a reasonable cost.

Stabilization Services

Housing Search and Placement

ESG provider agencies may offer services or activities necessary to assist program participants in locating, obtaining, and retaining suitable permanent housing. Housing should be mutually agreed upon by both the Case Manager and the participant's Head of Household. A Head of Household may be determined if the household consists of multiple adults, or of multiple minors with no adults. At a minimum, housing should be clean, decent, well-maintained, affordable, and in a neighborhood that meets the needs of the family.

Locating adequate housing is the responsibility of the family with assistance from a Case Manager as necessary. The Case Manager may contact landlords directly if advocacy is needed. Case Managers need to track current rental markets, landlords to avoid, and appropriately refer families to partnering landlords. Referrals will not be made to landlords that have repeatedly proven uncooperative with the ESG provider or a partner agency, have refused to reimburse due funds, do not adequately maintain properties, or have otherwise abused tenants' rights. If needed, financial assistance with application fees is available.

Per HUD, costs under Housing Stability Case Managements include: assessing (initial and periodic re-evaluations), arranging, coordinating, and monitoring the delivery of services to facilitate housing stability for participants. Services cannot exceed 30 days during the period participant is seeking permanent housing and 24 month's during the period participant is living in permanent housing.

During short-term assistance, case management includes: assessment; housing stability planning; and referrals. The household is expected to achieve stability goals in 90 days or less. Suggestions may be made for goals to be completed by the ESG participants without case management support. However, per HUD Guidelines, each household receiving ongoing assistance must meet with the case manager on a monthly basis, unless prohibited by Violence Against Women Act (VAWA) or Family Violence and Prevention Services Act (FVSPA).

Medium-term case management calls for regularly defined (monthly or more frequent is acceptable) face-to-face contact between household and case manager. Case management activities may include the same activities of short-term case management. Medium-term case management is required during the months of medium-term assistance and is appropriate when

considerable barriers or need for considerable coordination and advocacy, case plan is expected to last more than 90 days.

Mediation

Mediation services between the participant and property owner/manager are only eligible if necessary to prevent loss of permanent housing.

Credit Repair

Per HUD, credit repair can include credit counseling and other services necessary to assist with critical skills related to household budgeting, managing money, accessing a free personal credit report, and resolving personal credit problems. Additional credit counseling services will be available at the discretion of ESG provider agencies according to need and available resources.

Legal Services

Legal Services must be necessary to resolve a legal problem that prohibits the participant from obtaining permanent housing or will likely result in the loss of permanent housing. It may include landlord/tenant matters; child support; guardianship, paternity, emancipation, and legal separation; orders of protection and civil remedies for victims of DV; appeal of veteran's and public benefit claim denials; and the resolution of outstanding criminal warrants. Legal services related to immigration and citizenship or mortgages are ineligible under ESG. Prairie State Legal Service (PSLS) is the ESG legal service provider in Kane County. Participants requiring housing related legal services will be referred to PSLS for available services and legal advice.

Determining & Documenting ESG Eligibility

All households must be assessed for eligibility and appropriateness of ESG services, via an initial consultation and eligibility assessment with a case manager or other authorized representative who can determine eligibility and the appropriate type of service needed, upon entry. For financial eligibility households receiving HP services must be reassessed at least once every 90 days and households receiving RRH services must be re-assessed at least annually. Households which do not meet all eligibility criteria are not eligible to receive <u>any</u> 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 Housing Stability Plan at any point as determined by the ESG provider agency, or if ESG services are no longer the most appropriate service to stabilize housing. (See Separation Guidelines)

After initial eligibility, the ESG household is determined to remain eligible until 90 days or file closure, whichever comes first. ESG providers can choose to require re-evaluation each time a program participant experiences a change in income, household composition, or need for assistance.

ESG case files must show sufficient documentation of eligibility and determination of assistance. Guidance on acceptable documentation may be found at www.hudexchange.info. The expectation will be that documentation standards are of the highest standard reasonable. If a lower standard of

documentation is used (for example, self-statement of income) the agency will document attempts made to secure documentation and proceed only when reasonable and necessary to avoid or alleviate a homeless situation of the applicant household.

Eligibility criteria other than listed in HUD guidance or this program plan must be approved by Kane County CoC, documented in written policies and procedures, and must be applied consistently. Households must be eligible under each and all categories below

Eligibility Criteria:

Homeless Prevention (HP)

- ESG HP assistance can be available to individuals and families that are in Homeless Categories 2, 3, and 4, but are *not* literally homeless (see <u>Homeless Definition</u> for categories of homelessness) OR those in At-Risk of Homelessness Categories 1, 2, and 3.
- At initial assessment, households must have income <u>below</u> 30 % Area Median Income (AMI). (see <u>HUD Income Limits</u>) and must lack resources and support networks that would prevent them from moving into an emergency shelter or other place described in Category 1 of the homeless definition.
- At each 90-day reevaluation, to continue receiving ESG service households must have income that is <u>at or below</u> 30 % of AMI, and must lack sufficient resources and support networks to retain housing without ESG assistance.
- Must meet with a case manager no less than once per month for housing stability case management.

Rapid Re-Housing (RRH)

- ESG RRH assistance is only available to individuals and families who meet the definition for Literally Homeless Category 1 under the Homeless Definition Final Rule.
- There is no income threshold at initial assessment.
- At annual reevaluation, households must have income that is at or below 30 % of AMI, AND must have no appropriate subsequent housing options AND must lack sufficient resources and support networks to retain housing.
- Must meet with a case manager not less than once per month for housing stability case management.

All Households (HP or RRH):

- Must agree to allow household information to be shared with participating agencies of the Coordinated Entry System including via the HMIS reporting system; ESG funding recipients must be entered into HMIS for reporting requirements.
- Must complete a comprehensive assessment of needs and service plans for housing stabilization.
- ESG funding recipients must be willing to create and engage in a Housing Stability Plan and case management as needed to acquire and maintain stable housing.

- Households may be required to complete critical goals prior to being approved for ESG financial assistance. Such goals may include obtaining a source of income in the household as ESG financial assistance for rent will not stabilize a household alone.
- If receiving assistance with utility deposit or utility arrearage, household must show, in addition to imminent risk or homelessness, 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) and ESG assistance cannot be for the same cost type or time period as other assistance.
- If receiving rental arrears or short-term or medium-term rent assistance, the household must be living in or planning to move to a residence which meets HUD's Rent Reasonableness Standard, Fair Market Rent (FMR) Standards and housing habitability standards. (See Eligible Units)

Guidance for Determining & Documenting Housing Options, Resources & Support Networks

In addition to determining homeless status and other eligibility criteria, ESG agencies are required to assess whether an applicant has alternatives to ESG assistance to obtain or maintain housing. This includes an assessment of financial resources, assets, family or support networks which may translate to alternative housing options. Kane County CoC understands that, due to the diversity and complexity of our residents' needs and resources, there is no standardized tool which will accurately predict the future housing situation for all applicants. Kane County CoC will rely on the professional judgment of our ESG provider agency staff to assess, during their interview, housing options, resource and support networks and whether households need ESG assistance. To provide guidance on specific manners of assessment see below.

Financial Resources

Each file will contain a monthly budget which incorporates a household's income, resources and expenses. The budget is only required to look at expenses necessary to maintain housing and basic needs. However, agencies may also include debt payment or other expenses, including savings for housing stability, if deemed appropriate by the housing stabilization plan. When mainstream resources are available in the community, the ESG agency may require the ESG participating household to obtain or maintain these resources as a condition of assistance.

Assets

Household assets are *always* to be assessed to determine income eligibility as defined by HUD. A review of assets is also a relevant piece of determining whether a household has financial resources to obtain or maintain housing. Cash, savings and checking accounts are to be considered tangible assets available for the household budget as described above. Household reported cash, and bank accounts must be reviewed in the initial and recertification assessment process. Tangible assets such as furnishings, automobiles, jewelry and clothing may be retained by the household and are not required to be a part of this analysis. Assets designed by law for retirement (e.g., IRA, Roth IRA, 401K accounts) will not be a required aspect of the determination of the household's resources for applicants younger than 59.5 years of age.

For financial assistance, arrears and short-term rent assistance, agencies are not required to consider other assets (e.g. retirement accounts, certificate of deposit) in their assessment of the household's resources. For ongoing tenant based rental assistance, agencies are required to consider available assets (e.g., Certificate of Deposits, Investments) in determining whether to include use of these assets in the housing stabilization plan. The following questions are used as guidance for assessing and documenting this decision:

- o Does the household report any assets?
- o Can the assets be converted to cash quickly and without excessive penalty?
- Is the asset substantial enough, in and of itself, to assist the household in independently sustaining housing without risk?
- If the answer is yes to all of the above, the agency will require the household to strategically use the assets to stabilize future housing. ESG funded Housing Relocation and Stabilization Services may be offered at this time.
- If the assets are not substantial, or may not be converted to cash quickly and without cost and the household would only reasonably delay homelessness, the agency may plan strategic use of these assets in the housing stabilization plan but use of assets is not required by the CoC.

For the purpose of this guidance, 'substantial' refers to assets which exceed 2 months of basic household expenses as defined in financial resources above. 'Without significant penalty' means a loss of 25% or more of available assets, including potential tax penalties.

Social Support Networks

At the time of application, ESG providers will explore housing options with all applicants. It is the clear intention of the Kane County CoC that viable housing alternatives will be safe and adequate. Case managers will explore current or future alternatives that participants have to ESG assistance. These alternatives include financial resources toward the monthly budget, such as family support, church contributions, or housing alternatives which may include staying with family or friends. Case managers will explore these options in their interview and document, in the file, their concluding assessment of whether these are viable alternatives now or in the future. Viable options would include those which are safe, adequate and unlikely to place the household members at future risk of homelessness (e.g. breaking a lease where the landlord will enter a financial judgment).

Non-Duplication

ESG specifies a household previously deemed ineligible, but which becomes eligible may continue to receive assistance but is not to exceed a total of 24 months of assistance within a 3 year period. Additional financial supports will be determined at the discretion of the ESG provider agency using geographic boundaries and criteria for *Non-selection/Non-continuation*.

Non-Selection/Non-Continuation (Initial/Continuing Eligibility)

The ESG provider 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 or annual 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 Housing Stability Plan; OR
- Household non-readiness, as determined by the ESG providing agency, due to:
- Lack of "key" services from service providers in the community or an unwillingness/inability by the household to link to such key services; AND/OR
- Household's misuse of resources, including personal resources such as income and benefits

<u>Key resources</u> are those resources or services that are integral to the household's ability to achieve self-sufficiency.

- <u>Self-Sufficiency</u> 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 provider 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 homelessness prevention services, shortterm case management or some equivalent data.

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

Separation Guidelines

All assistance provided under ESG is subject to eligibility requirements and program guidelines. Final decisions regarding non-continuation will be relayed in writing, to the household, by the ESG provider agency. The ESG provider 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. Per HUD guidelines, provider agencies must exercise judgment and examine all extenuating circumstances in determining when violations warrant termination, so that a program participant's assistance is terminated only in the most severe cases.

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 noncontinuation 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 promptly in writing.

Eligible Units

See ESG Interim Rule 24 CFR Parts 84, 85, 91, & 576 for information regarding conflicts of interest, Non-discrimination and Equal Opportunity Requirements, Fair Housing, and Civil Rights laws.

Fair Market Rent Limits (FMR) and the Rent Reasonableness Standard

All units which receive Tenant Based Rental Assistance (TBRA) under the ESG Program must have a monthly gross rent which is at or below the most recently published HUD rents (see <u>HUD Fair Market Rents</u>). It is the responsibility of the ESG provider agency to check this website for the most current FMR information. The monthly gross rent must also meet HUD's rent reasonableness standard, meaning the gross 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. These standards of Fair Market Rent (FMR) and Reasonableness apply to arrearages as well as rent going forward. See HUD's guidance on calculating FMR & determing Rent Reasonableness.

To document rent reasonableness, the agency must determine rent reasonableness using one of the following methods:

- o 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;
- o Any amenities, services and utilities to be provided by the owner.

Documentation of the comparable review will be retained in the participant file. See HUD's Rent Reasonableness Checklist and Certification form.

Minimum Habitability Standard

HUD has set minimum standards for permanent housing. ESG funds may only be used to help a program participant remain or move into housing which meets these minimum habitability standards. This includes funds for Housing Stabilization Services as well as Tenant Based Rental Assistance. ESG provider agencies are to ensure that housing meets the minimum criteria as outlined in CFR 576.403.

Housing inspections completed by a Public Housing Authority for units that will receive a HUD-VASH or Housing Choice Voucher program are acceptable as long as they have been completed within 60 days of the clients ESG application. Client files must contain documentation from the respective Public Housing Authority to confirm that the unit passed inspection prior to a provider issuing financial assistance.

Lease Requirements

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

- The landlord must agree to work with the ESG provider agency to accept rent payment and to stop eviction proceedings upon receipt of notification.
- 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 in general. HUD does not specifically exclude month-to- month leases. The ESG provider agency will attempt to engage the landlord to work on a long-term lease arrangement when this benefits the client. IF ESG assistance is used to assist a household secure new housing, HUD requires a minimum of a one-year lease.
- ESG provider agencies must have a copy of the valid lease to assist with rent unless financial assistance is limited solely to payment of rental arrears. Valid leases must include signatures of both the client and/or a member of the household and the owner/authorized representative, and must be dated.
- 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. Only the owner of record or Management Company may be
 paid.

Rental Assistance Agreement

Rental Assistance cannot be provided without an agreement between the ESG provider agency and the owner/property manager.

- ESG provider agencies will ensure that a rental assistance agreement between the provider and the owner/property manager is completed for each participant household receiving rental assistance.
- ESG provider agencies must ensure timely rent payments are made on behalf of participant households receiving ongoing financial assistance. ESG regulations specifically prohibit late payment fees incurred by the ESG provider under Rental Assistance Agreement with the owner/property manager.
- The Agreement must contain the same rent payment due date, grace period and late payment penalty requirements as the program participant's lease.

HMIS Standards

HMIS is locally administered by the Kane County Continuum of Care locally referred to as HMIS or Homeless Management Information Systems. HMIS was developed by HUD to gather and analyze data to determine the effectiveness of McKinney-Vento Act Programs. HMIS provides the ability to: develop unduplicated counts of clients served at the local level; analyze patterns of use of people entering and exiting the homeless system; and evaluate the effectiveness of those systems.

ALL Kane ESG providing agencies must enter client-level data into the Kane County Continuum of Care's HMIS system. Baseline requirements include: Data collection; program descriptors; universal data elements; and program specific data elements. These elements have been revised for the implementation of ESG and may be updated as necessary at the discretion of the HMIS Committee and Board of the Kane County Continuum of Care.

All ESG provider agencies must:

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

The Kane County Continuum of Cares HMIS Privacy Plan, baseline privacy policy and additional documents can be found at http://www.countyofkane.org/Pages/ocr/continuumCare.aspx.

ESG provider agencies should be prepared to promptly enter client and service level data into HMIS; share information within HMIS; send and receive electronic referrals via HMIS. The HMIS Committee contributed to the development of a standardized assessment, referral and reporting requirements.

- ESG provider agencies must adhere to the following requirements for **each** member of a participating household:
 - Complete the Continuum MDR
 - Complete the ESG Assessment- upon initial assessment, updated quarterly or annually at recertification per applicable HUD requirements, and upon exit
 - Complete a ESG Program Entry & Exit
 - Applicable ESG Financial Services for each service provided
 - Applicable ESG Relocation & Stabilization Services for each service provided-a case management service must be entered for each member of a participating household every quarter

In addition to a valid authorization to release information from the head of household and each adult member, each ESG provider agency has agreed to participate in ESG provider groups within HMIS to share information required for reporting purposes and to prevent duplication of services. See *Kane Homelessness Prevention Partnership Community Partnership Agreement 2011 (updated annually)*.

Tracking Services and Outcomes

Services and program outputs must be tracked according to HMIS standards. The Board of the Continuum of Care determined that the HMIS-generated Annual Performance Report (APR) and the annual Kane County CoC Homelessness Prevention Reporting Tool are, together, sufficient to track outcomes. However, all ESG agencies must complete a follow up call in 90 days from the date households were exited from ESG to determine whether the household remained stably housed.

See the <u>CoC APR Guidebook</u> for more information. Additional performance outcomes may be proposed by the Board of the Continuum of Care. Consistent HMIS data entry will increase potential for continuum-wide ESG performance.

Non-Discrimination and Equal Access Policy

The Continuum of Care for Kane County, which is comprised of local service agencies and providers, does not, and shall not, discriminate on the basis of race, color, religion (creed), gender, gender expression, national origin (ancestry), disability, marital status, sexual orientation, or military status, in any of its activities or operations. These activities include, but are not limited to, provision of any and all services, hiring and firing of staff, and selection of volunteers and vendors. The Continuum of Care for Kane County is committed to providing an inclusive and welcoming environment for all members of our staff, clients, volunteers, subcontractors, vendors, and clients.

Additionally, the Continuum of Care for Kane County, and all affiliated agencies and providers, adhere to the *Equal Access in Accordance with an Individual's Gender Identity in Community Planning and Development Programs*, which ensures that all projects are open to all eligible individuals and families, regardless of sexual orientation, gender identity, or marital status. Equal access to all accommodations, benefits, and services are provided to individuals and families.

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. To facilitate coordination, to ensure non-duplication and to aid in the consistent reporting of ESG services provided within the HMIS service system, all participating adults must be informed of the HMIS Privacy Policy. Participant's information will be utilized and shared per the standards in the Privacy Plan and policy. All participating adults are required to sign an Authorization to Release Information, including household demographics, income, and service information and case plan that may be shared amongst all providers in the Homelessness Prevention Provider Committee. Participating household members may decline sharing of certain assessment information which is not essential to coordination/non-duplication. It is the responsibility of the ESG provider agency to protect the confidential nature of such information. However, participant refusal to share essential information for service coordination/non-duplication will affect eligibility for ESG services.

Recordkeeping Requirement

Sufficient records must be established and maintained by ESG Providers to demonstrate that all ESG requirements are being met.

Record Retention Period

ESG providers must maintain documentation on all households seeking assistance. If determined ineligible, documentation must reflect reasons. Documentation of participant eligibility and assistance provided must be retained for 5 years after the expenditure of all funds from the grant under which the program participant was served.

Reporting Requirements

ESG Recipients will submit annual performance reports to HUD via Consolidated Annual Performance and Evaluation Reporting (CAPER). Kane ESG HPRR providers will ensure necessary data is available in the required format per the grantors (State of Illinois and/or Kane County) requests.

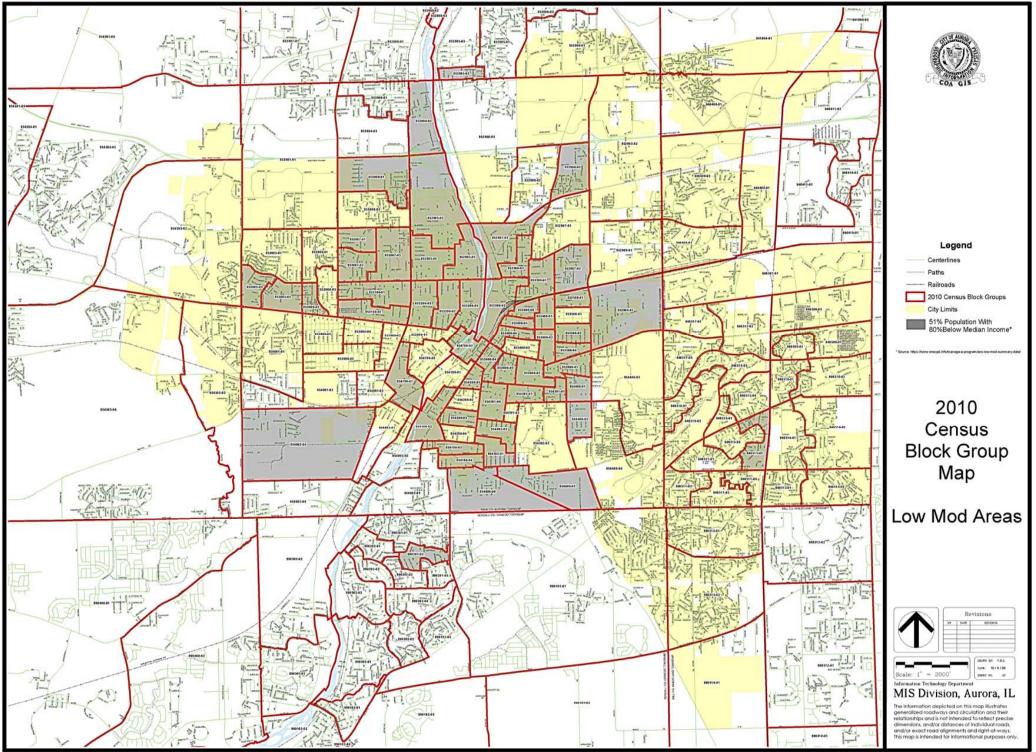
Monitoring

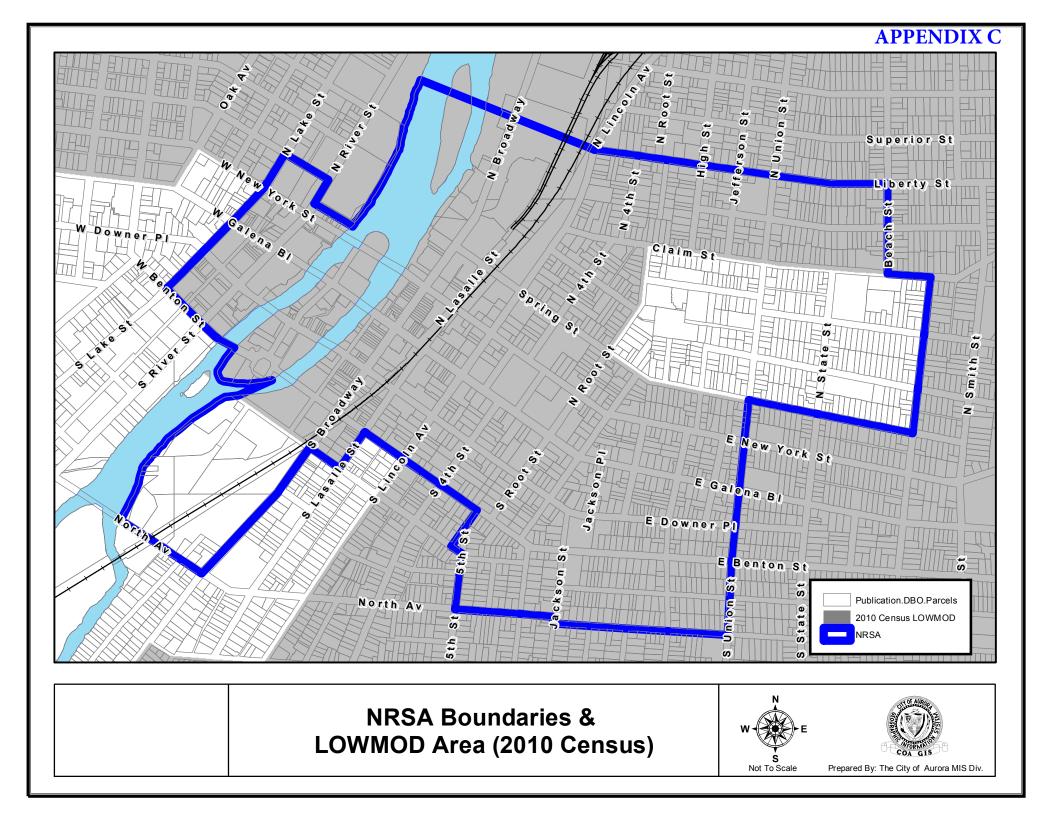
Kane ESG providers have received funding from either or both state and county grantees. As with program implementation guidance, monitoring requirements are expected to be met as they are outlined by each grantor. The requirements may be included in contracts, Memorandum of Understanding, or manuals. As ESG program has been in development, some updates to procedures may be provided via email.

County guidance for direct federal allocation states the following:

Sub grantee monitoring reinforces accountability; provides for continuous improvement; and is required by the ESG Notice. Monitoring goals include the improvement of program and financial performance and ensure regulatory compliance in all areas. Monitoring the ESG in the County is done through a variety of measures consisting of desk top review, which also includes evaluation of requests for payment, and on-site visits with file review.

APPENDIX B





City of Aurora Draft 2019 Annual Action Plan

ATTACHMENT 3

Grantee SF-424's and Certification(s) - To be added in final version

