



# City of Aurora

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City of Aurora – Policies and Procedures  
Tenant Placement Assistance (TPA) Program  
Drafted: XX XX, 2025

## 1. Background, Applicability

As of January 2025, the City of Aurora (the City) Community Development Division (CDD) finalized its City of Aurora 2025-2030 Affordable Housing Strategy directed to be drafted by the Mayor and City Council to create strategies to preserve and expand affordable housing in the City. The CDD took a comprehensive approach to complete this defining what affordable housing is, conducting stakeholder engagement focusing on affordable housing broadly, and also looking specifically by population type which included subject matter experts, and residents in need of affordable housing in which over 20,000 data points were collected, and finally the analysis of this data to formulate recommendations that the City could put in action to preserve and expand affordable housing in Aurora. One of the recommendations in the Affordable Housing Strategy was the creation of an Aurora Affordable Housing Fund to allocate funds to programs to preserve and expand affordable housing opportunities for Aurora residents.

One of the programs identified by the CDD to offer as an opportunity for local partners to apply and administer is the Tenant Placement Assistance (TPA) Program, hereinafter referred to as the Program. A common theme heard by local stakeholders, as well as seen across other plans, strategies, and best practices across the nation is that many individuals have barriers to obtain rental housing, which either force them to be homeless, or obtain housing that is unsanitary and unsafe. Some of these most common barriers are low credit scores, past evictions, past convictions, living in a homeless shelter, etc. The goal of this program is to place those that experience the most barriers to obtaining housing in safe and sanitary rental housing.

## 2. Authority

*City of Aurora 2025-2030 Affordable Housing Strategy*

## 3. Eligible Clients to be Served (Full flowcharts of eligibility outlined in Exhibit A)

Low to moderate income individuals, identified by partners that will be administering this program, that experience the most barriers to obtaining rental housing, as well as those that have the most likelihood to maintain the rental housing and become self-sufficient.

#### 4. Eligible Program Costs

The Program funds may be used for first and last month rent, up to a double security deposit, rental application fees, moving costs, for the household to obtain housing. City staff may increase or decrease an award on a case-by-case basis by reviewing small area fair market rents or other localized data, duplication of benefits review, and unique circumstances included by the applicant in their application. To be eligible for the Program, tenants must submit all required supporting documentation to qualify. The City will determine the amount of assistance provided.

#### 5. Ineligible Program Costs

The eligible costs are listed above to assist a household to obtain rental housing. Any other costs other than the costs provided above, will be ineligible.

#### 6. Maximum Subsidy

The Program provides funding from the Aurora Affordable Housing Fund and can provide first and last month rent, up to a double security deposit, rental application fees, moving costs, for the household to obtain housing. City staff can review this policy and provide additional assistance on a case by case basis. The amount of rental assistance is based on the rent amount outlined in a signed lease, with maximum amounts established by HUD's current fair market rents, which vary by bedroom size (see table below). City staff may increase or decrease an award on a case-by-case basis by reviewing small area fair market rents or other localized data, conducting a duplication of benefits review, and considering unique circumstances included in the applicant's application. To be eligible for the Program, tenants must submit all required supporting documentation to qualify.

Zip Code	Number of Bedrooms*	Maximum Amount for 1 Month of Assistance	Maximum Amount for 2 Months of Assistance	Maximum Amount for 3 Months of Assistance
60504	0 (Studio)	\$2,010	\$4,020	\$6,030
	1 Bedroom	\$2,140	\$4,280	\$6,420
	2 Bedrooms	\$2,430	\$4,860	\$7,290
	3 Bedrooms	\$3,130	\$6,260	\$9,390
	4 Bedrooms	\$3,660	\$7,320	\$10,980
60505	0 (Studio)	\$1,330	\$2,660	\$3,990
	1 Bedroom	\$1,430	\$2,860	\$4,290
	2 Bedrooms	\$1,610	\$3,220	\$4,830
	3 Bedrooms	\$2,070	\$4,140	\$6,210
	4 Bedrooms	\$2,430	\$4,860	\$7,290
60506	0 (Studio)	\$1,380	\$2,760	\$4,140
	1 Bedroom	\$1,480	\$2,960	\$4,440
	2 Bedrooms	\$1,670	\$3,340	\$5,010
	3 Bedrooms	\$2,150	\$4,300	\$6,450
	4 Bedrooms	\$2,520	\$5,040	\$7,560

\*Per Chicago-Joliet-Naperville, IL HUD Metro FMR Limits, 4/28/2025

## 7. **Program Boundaries**

The Program assistance must be used for tenants who will reside in rental units within the City limits of Aurora confirmed by a search on [MyPlace](#). Unincorporated areas of Aurora are excluded from the Program. The program operator agencies do not need to be located within the City's limits.

## 8. **Eligible Applicants**

Eligible Applicants must meet HUD income limits in order to receive assistance through this program. Refer to Section 12 for the specific income limits. Funds provided under the Program may only be used for the eligible costs listed in Section 4 and associated late fees and demonstrate a major barrier to obtaining rental housing such, but not limited to, a loss in employment, reduction in hours or earnings, unexpected expense, or affected in another negative matter to be summarized by the applicant. A signed executed lease between the tenant and landlord must be provided that includes the address and the cost of rent. Tenants that are renting only a room may be eligible if a signed executed lease is submitted in the application and the unit is registered with the City. The City will take the following actions when reviewing if units are licensed with the City:

<b>Licensed Status</b>	<b>Eligibility</b>	<b>Required Action</b>
In good standing	Eligible	No action
Unit licensed, but has an open violation	Eligible	No initial action, staff will send a request to Property Standards
License expired less than 12 months ago	Eligible	No initial action, staff will send a request to Property Standards
License expired more than 12 months ago	Eligible with follow up required	No assistance will be provided until the unit is up to date with Property Standards
No license	Not eligible	A notice will be sent to Property Standards to identify the violation

The City and selected Subrecipient Agency(ies) will consider unique situations on a case-by-case basis and all payments will be sent directly to the landlord. The tenant will also be responsible for reaching out to their respective landlord to collect the required documents for the City and selected Subrecipient Agencies to directly pay the landlord. The applicant must also demonstrate that the household can afford to make monthly rent payments moving forward based on the total household income or other benefits that are received or approved for future monthly rent payments.

## 9. **Housing Standards / Inspections**

The Division of Property Standards is required to conduct annual inspections on every rental unit within the City. In some instances, if the unit is in excellent condition, a pass may be given, and the property will be scheduled for an inspection within a two (2) year period.

Inspector checklist is at Property Standards page prior to inspections to ensure properties are in good condition. If an inspection fails, Property Standards will allow reasonable time to fix the failed items and then perform a re-inspection on the items.

Property Standards follows specific standards to determine units are safe, sanitary, and free of life-threatening conditions. Occupancy requirements, a sleeping space chart, and a recently updated City Ordinance are used during the inspection process.

The City currently uses the International Property Maintenance Code / 2015 Edition and adopted codes to determine if rental units are safe, sanitary, and free of life-threatening conditions. The link to the standards can be found below:

[Code of Ordinances | Aurora, IL \(aurora-il.org\)](http://www.aurora-il.org/CodeofOrdinances)

## **10. Good Standing Check**

A good standing check will be completed, and the following protocols will be used as part of the application review process:

1. Amounts outstanding and owed to the City will not be used to disqualify a recipient if they cannot regain good standing status.
2. All amounts owed are still owed and not forgiven, and liens, etc., will still be used to make collection.
3. A copy of any past due balances will be included in award letters and applicants must acknowledge that they are not in good standing with the City of Aurora.

## **11. Tenant Selection**

The City has not identified a preference for administering the Program funds to households and will rely on partner agencies administering the funding to establish a method of prioritization based on the activities they administer. The methods of prioritization will be determined by level of need to maximize funding and outcomes based on outcomes established in the partner agencies' signed agreement and prioritization matrix as applicable. The City's Affordable Housing Strategy has outlined a variety of unmet needs amongst those with the most rental housing barriers in Aurora with eligible costs that reflect the needs. Partners must adopt and follow written policies and criteria for approving households under the Program:

## **12. Income Eligibility**

For clients that utilize income to qualify as a QP, families must be determined to be income eligible prior to receiving assistance. The "Part 5" method of income qualification will be utilized. At least two months of source documentation are required to determine income along with any financial hardship that may have impacted household income and expenses. All Families' income cannot exceed 30% of the median family income within the City if income certification is required to qualify as Qualifying Population #2 and cannot exceed 50% of the median family income to qualify as Qualifying Population #4 if other conditions

are met (which can be found on the HOME-ARP QP Eligibility Flowchart; Exhibit A), as promulgated by HUD from time to time at the time of application.

The CPD Income Eligibility Calculator will be used to determine/verify the Annual Income and the Adjusted Gross Income for each household requesting assistance.

<b>Household Size</b>	<b>30% MFI Maximum Income Qualifying Population #2</b>	<b>50% MFI Maximum Income Qualifying Population #4</b>
1	\$25,200	\$42,000
2	\$28,800	\$48,000
3	\$32,400	\$54,000
4	\$35,950	\$59,950
5	\$38,850	\$64,750
6	\$43,150	\$69,550
7	\$48,650	\$74,350
8 or more	\$54,150	\$79,150

\*Per Chicago-Joliet-Naperville, IL HUD Metro MFI Limits, 4/1/2025

### **13. Expectation of Family to Utilize Additional Resources**

Although encouraged, families are not required to participate in a self-sufficiency program through the Subrecipient handling its case to receive Tenant Placement Assistance. CDD staff will work with Subrecipient Agencies to develop an optional Self-Sufficiency Program plan.

### **14. Violence Against Women Act (VAWA)**

The Violence Against Women Act (VAWA) provides expanded protections to victims of domestic violence, dating violence, sexual assault, and stalking across HUD housing and homelessness programs. VAWA Subrecipients must comply with the Violence Against Women Act (VAWA) requirements set forth in 24 CFR 92.359. Generally, applicants, occupants, service participants, and tenants may not be denied assistance or have assistance terminated on the basis of or as a direct result of their status as a victim. Subrecipient will be required to incorporate the VAWA Lease Addendum into the approved lease in accordance with 24 CFR 92.359(e). [24 CFR 92.253(a)].). This notice also applies to men and qualifying members within the definition of a family.

### **15. Recommendation to receive services from the Aurora Financial Empowerment Center**

Applicants will be encouraged by Subrecipients to take advantage of ongoing free, one-on-one financial coaching that will be offered through Aurora's Financial Empowerment Center (FEC). Consultation with the Aurora is FEC is not required to receive emergency rental assistance, but applicant contact information including phone numbers and email addresses may be provided to the FEC for follow-up pending approval from the applicant.

## **16. Program Operation**

The City will operate the program through Subrecipient Agencies that have the capacity to operate the Program and the ability to provide the particular types of services that are appropriate for those with barriers to rental housing receiving Program assistance. The Subrecipient Agency shall provide funding directly to the unit's landlord on behalf of the family, in accordance with the terms of the lease, and receive reimbursement from the City under the terms of its subrecipient agreement. Each lease must be held in the name of the tenant. The Subrecipient Agency must ensure that landlord payments are timely in accordance with the Subrecipient and landlord financial agreement and that the financial assistance agreement contains the same payment due dates as the assisted tenant's lease.

No TPA funding will be provided past the term of the contract.

## **17. Verified and Documented Cash Reserves Thresholds**

Cash reserves or other assets determined to be liquid assets must be identified in the application. If cash reserves are identified to be greater than 3 months of the total tenant rent, or \$5,000 in documented reserves, then these applications will be denied. A determination of this calculation will be conducted on a case by case, and partial awards may be granted based on this calculation. Retirement accounts will not be considered in this calculation.

## **18. Duplication of Benefits Review**

A duplication of benefits review will be required for each awarded application. The Program funds will only be used as the gap if additional funds are received from another federal, state, county, or other program offering rental financial assistance. Should an applicant receive additional funding that is considered duplicative, the applicant will be required to pay back the assistance to the City in full within 30 days after receiving TPA funding.

## **19. Inspection**

In order to be eligible for the Program, the condition of the property must be free from life threatening conditions and verified as safe, decent, and sanitary by the applicant. Applications received where the tenant is living in substandard housing (lacking in complete kitchen or plumbing facilities) may be recommended for emergency funding but will be also referred to local nonprofit agencies for assistance in finding a new residence that is identified as safe, decent, and sanitary. A report of the most recent inspection will also be obtained from the Property Standards Division for review.

## **20. Records**

Records of all leases, subleases, and financial assistance agreements for the provision of rental payments, documentation of payments made by the PJ to owners, The program sponsor, or qualifying households for the provision of financial assistance for rental payments, and supporting documentation for these payments, including dates of occupancy by qualifying individuals and families needs to be submitted and kept in the client file.

## **21. Subrecipient Agencies**

Any agency that can demonstrate it has previously served households with barriers to obtaining rental housing and has the demonstrated capacity and previous experience administering federal, state, and local funding may apply to participate as a Subrecipient Agency under the City's Program. Acceptance into the Program will be based on the agency's ability to demonstrate through its completion of an application process that it can provide the types of services or can demonstrate partnerships that are appropriate for households with barriers to obtaining rental housing, and has the capacity to hold clients accountable to the terms of the City's Program, and has the capacity to operate the Program. Approval to participate does not guarantee that there will be sufficient funding available to operate the Program through multiple agencies.

## **22. Appeal Process**

Due to the nature of the Program, no appeals will be accepted. City staff and selected partners will utilize a fair process for determining awards including review of the application, standard documentation, and the same underwriting standards for each application. The City and selected partners reserve the right to request additional supporting documentation to consider awarding an applicant, and failure of the applicant to provide the requested supporting documentation by the deadline communicated with the request for more information will result in the denial of the application.

## **23.**

If an applicant knowingly makes a misstatement or omission in any statement, document, or application in connection with the Applicant's request for assistance, as determined at the sole discretion of the subrecipient agency and in direct consultation with the City, the Applicant will be immediately disqualified from the program. In addition to the disqualification from the program, the Applicant may be subject to both civil and criminal prosecution and a demand for immediate repayment of any funds disbursed on behalf of the applicant for rent assistance.

## **24. Project Completion**

Project completion for the Program means the client has been provided the maximum allowed award and/or final drawdown from the subrecipient has been disbursed.