### PUBLIC NOTICE

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) and HOME Investment Partnerships Program (HOME and HOME-ARP). In accordance with the City of Aurora's Citizen Participation Plan and the requirements of HUD, a public hearing will be held at 1:00 p.m. on January 5, 2024, City Hall, 5<sup>th</sup> Floor Conference Room, 44 E. Downer Place, Aurora, IL 60507 to provide the public an opportunity to comment on the City of Aurora 2024 Annual Action Plan and Substantial Amendment 2023-#3 proposed funding recommendations.

Please be advised that effective December 18, 2023, summaries of the proposed *2024 Annual Action Plan* and *Substantial Amendment 2023-#3* will be available for review and public at the following locations: City of Aurora-Community Development Division, 44 E. Downer Place, 4<sup>th</sup> Floor, 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's website: www.aurora-il.org/1175/Community-Development. The proposed Amendments to the City's 2019, 2020, 2021, 2022, and 2023 Annual Action Plans will result in the re/allocation of CDBG and HOME-ARP funds and adjustments needed to ensure the integrity of the City's spending obligations and to also further address the City's effort to comply with HUD's regulatory requirements in administering the City's CDBG and HOME-ARP Programs.

As per 24 CFR 570.200(h), 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 and HOME activities identified in the City's 2024 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 \$300,000 or 25% of the amount of the City's anticipated 2024 CDBG allocation. Costs related to the HOME program may not exceed 25% of the City's current program amount. Citizens are advised that such pre-award costs will have no effect on future grants, and will be in compliance with the regulations that govern the CDBG and HOME Programs as stated at 24 CFR Part 570, 24 CFR 92, and 24 CFR Part 576, respectively, as well as the Environmental Review Procedures stated in 24 CFR Part 58. To provide the required public disclosure of the City's intent to use unobligated carry forward funds as necessary for such 2024 pre-award costs, the regulatory provisions for incurring pre-award costs will be discussed at the public hearing. This may include using unobligated front funding for CDBG public service, program administration, community amenities/neighborhood revitalization/infrastructure, and housing activity costs as well as HOME administration and project costs. Questions should be directed to the Community Development Division at (630) 256-3320 or COACDD@aurora.il.us.

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 the Community Development Division (CDD), 44 E. Downer Place, Aurora, IL 60507, (630) 256-3320 or COACDD@aurora.il.us.

Written and verbal comments will be accepted no later than 4:00 p.m., January 16, 2024. All responses will be addressed by the CDD and submitted to HUD. The City of Aurora's 2024 Annual Action Plan and Substantial Amendment 2023-#3 are scheduled for review and adoption at the City Council's January 23, 2024 meeting at 6:00 p.m., City Hall, 5<sup>th</sup> Floor Conference Room, 44 E. Downer Place, Aurora, IL 60507. Please be advised that the public hearing and meeting dates are subject to change. This page left intentionally blank.



## City of Aurora, Illinois Housing & Community Development Block Grant Consolidated Plan Program Years 2020 – 2024

2024 Annual Action Plan

DRAFT (December 2023)

Community Development Division • 44 E. Downer Place • Aurora, Illinois 60507 (630) 256- 3320 • coacdd@aurora.il.us



#### **Executive Summary**

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

#### 1. Introduction

This document contains the Annual Action Plan for the City of Aurora, effective from January 1, 2024 through December 31, 2024. This Plan 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 2020-2024 Consolidated Plan, which include physical, economic, demographic, and social conditions throughout the city. As the lead agency, the City of Aurora's Community Development Division (CDD) 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 2024 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 HOME Investment Partnerships Program (HOME).

The City's 2024 allocations are based upon an estimate as per 100% of the City's 2023 annual allocations.

#### 2. Summarize the objectives and outcomes identified in the Plan

Please see Sections AP-15 and AP-35 for the City's specific 2024 Goals, Objectives and anticipated outcomes.

#### 3. Evaluation of past performance

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

Over the next year, the CDD hopes to improve on a variety of issues to increase efficiency and utilize federal funds in an efficient and timely matter. The CDD would like to increase the pipeline of projects to spend funds in a timely fashion. The goal is to have several shovel-ready projects, should additional funds be received or become available. This will reduce the City's CDBG timeliness ratio and prevent the loss of HOME funding due to inactivity.

The City would also like to increase the number of agencies and city departments that have the capacity to apply for and receive CDBG and HOME funds. There are numerous non-profit agencies that qualify based on their services and clientele, but need to increase their reporting and recordkeeping practices and learn about the additional requirements of federal funding.

The City will also continue to review its community development trends and needs on an ongoing basis and make amendments to the Plan as required over the next two years.

#### 4. Summary of Citizen Participation Process and consultation process

The City announced its pre-application CDBG workshop on August 11, 2023. The non-mandatory workshop was conducted via the Zoom online platform for potential 2024 applicants on August 25, 2023. At that time, in addition to presenting the City's anticipated 2024 CDBG allocation, the City's application period was open for approximately four weeks (application deadline was September 22, 2023). Twenty-two (22) applications were submitted. City staff reviewed the applications and submitted its proposed recommendations for review by the Block Grant Working Committee. The results of staff analysis of the applications and their ability to meet the goals and objectives established by the City's 2020-2024 Consolidated Plan formed the recommendations for the City's 2024 Annual Action, which were subsequently forwarded to the City's Block Grant Working Committee for approval. City staff also considered alternative funding such as the City's 2024 Quality of Life (QoL) which is funded by the City's gaming tax, and Home Investment Partnerships Program – American Rescue Plan (HOME-ARP) funding if the applicant applied for CDBG and/or QOL opportunities or if a proposed activity was a better fit for one of the other funding programs. The Block Grant Working Committee recommended approval for ten (10) of the applications. Although some of the denied applications were denied due to CDBG program qualification concerns (i.e. agency capacity, demonstration of funding need, past performance, etc.), one of the denied applications was referred to the City's QoL Program, A public hearing is scheduled for January 5, 2024. The 2024 Annual Action Plan public comment period concludes on January 16, 2024. Final approval of the Block Grant Working Committee's recommendations is required by City Council. The anticipated date for City Council review and approval is scheduled for January 23, 2024.

#### 5. Summary of public comments

To date, the City has not received any comments.

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

The wide range of perspectives in the public participation process pointed to the need for flexibility of the use of funds to address Aurora's affordable housing gap, de-concentrate poverty, and provide neighborhood-based amenities in underserved communities. A more detailed summary of the public participation process is provided in the Citizen Participation Outreach Table in PR-15 – Citizen Participation.

#### 7. Summary

The Community Development Block Grant (CDBG) program is Aurora's most flexible funding resource and can be used for housing and non-housing activities, including those that revitalize neighborhoods, promote economic development, improve community facilities/infrastructure, and provide public services, all of which must benefit the City's low and moderate income residents. The CDD anticipates receiving approximately \$1.3 million each year.

The HOME Investment Partnerships (HOME) program supports building, acquiring, and/or rehabilitating affordable housing for rent, homeownership, or provides direct rental assistance to low-income residents. CDD anticipates receiving approximately \$700,000 each year.

The City anticipates level funding throughout implementation of the Plan. The total funding anticipated over the next year is \$1.3 million, though this number may change pending annual appropriations and program income (i.e. repayment of loans).

	2020	2021	2022	2023	2024	Total
CDBG	\$1,533,216	\$1,497,494	\$1,374,767	\$1,304,706	\$1,304,706	\$7,014,889
HOME	\$737,077	\$752,348	\$768,434	\$701,962	\$701,962	\$3,661,783

Table 1 - Anticipated 5-Year HUD Program Funding

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

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

Agency Role	Name	Department/Agency
Lead Agency	AURORA, IL	Community Development Division
CDBG Administrator	AURORA, IL	Community Development Division
HOME Administrator	AURORA, IL	Community Development Division

Table 2 – Responsible Agencies

#### Narrative (optional)

As a HUD entitlement grantee, the City of Aurora has designated its Community Development Division (CDD) as the lead agency for administration of the CDBG and HOME 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 CDD 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 Community Development Division Community Services Department City of Aurora 44 E. Downer Place Aurora, IL 60507 P: 630-256-3320

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

#### 1. Introduction

The City's 2024 Annual Action Plan (AAP) was prepared by its Community Development Division. As the lead agency, the City of Aurora's Community Development Division (CDD) is responsible for carrying out activities to meet priority needs. The City followed its Citizen Participation Plan in announcing its 2024 AAP funding cycle.

The City announced its pre-application CDBG workshop on August 11, 2023. The non-mandatory workshop was conducted via the Zoom online platform for potential 2024 applicants on August 25, 2023. At that time, in addition to presenting the City's anticipated 2024 CDBG allocation, the City's application period was open for approximately four weeks (application deadline was September 22, 2023). Twenty-two (22) applications were submitted. The results of staff analysis of the applications and their ability to meet the goals and objectives established by the City's 2020-2024 Consolidated Plan formed the recommendations for the City's 2024 Annual Action, which were subsequently forwarded to the City's Block Grant Working Committee for approval. City staff also considered alternative funding such as the City's 2024 Quality of Life (QOL), and Home Investment Partnerships Program – American Rescue Plan (HOME-ARP) funding if the applicant applied for CDBG and/or QOL opportunities or if a proposed activity was a better fit for one of the other funding programs. . The Block Grant Working Committee recommended approval for ten (10) of the applications. Although some of the denied applications were denied due to CDBG program qualification concerns (i.e. agency capacity, demonstration of funding need, past performance, etc.), one of the denied applications was referred to the City's QoL Program, A public hearing is scheduled for January 5, 2024. The 2024 Annual Action Plan public comment period concludes on January 16, 2024. Final approval of the Block Grant Working Committee's recommendations is required by City Council. The anticipated date for City Council review and approval is scheduled for January 23, 2024.

A summary of citizen consultation efforts, including a summary of comments or views submitted and reason comments or views were not accepted to satisfy the City's HUD Funding Program Requirements and a description of the corresponding public notification process are attached to the Citizen Comments Attachment.

# 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))

Staff from the Mayor's Office participate in a variety of non-profit roundtables and coordinates meetings to identify needs for service and investment within the community.

<u>Aurora Housing Authority</u>: The City of Aurora maintains a positive relationship with the Aurora Housing Authority (AHA) and its Executive Director, Ralph Jordan. The CDD has will continue its partnership with the Housing Authority to create, maintain, and further affordable housing opportunities throughout the City.

<u>Nonprofit Service Providers</u>: The City also 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, including agencies that provide housing assistance, such as including the Association for Individuals with Disabilities (AID) and Community Housing Advocacy and Development (CHAD).

<u>Frequent Users System Engagement (FUSE)</u>: The FUSE initiative is a collaborative partnership of local agencies representing government - City of Aurora, Aurora Fire Department, Aurora Police Department, health care - Presence Mercy Medical Center, Rush Copley Medical Center - and nonprofit service providers - Hesed House, Breaking Free and Association for Individual Development. The explicit mission of the FUSE Initiative is to develop innovative solutions for the chronically homeless individuals who frequently use public services like ambulances and emergency rooms.

<u>Financial Empowerment Center (FEC) Replication Initiative</u>: The Cities for Financial Empowerment (CFE) fund provides both funding and focused technical assistance to mayors and their teams to promote systemic financial empowerment programs and policies into city services that improve individual and financial stability. Since 2021, The Neighbor Project has partnered with the City to manage the FEC as well as coordinate and build partnerships among other organizations, and will continue to administer the program through 2024. Services at the FEC include financial counseling assistance – reducing debt, establishing and improving credit, connecting to safe and affordable banking services, building savings, and budgeting, among other activities.

<u>Invest Aurora</u>: Invest Aurora is a public-private partnership that works to promote, attract, and retain commercial, industrial, retail, and mixed-use development in the City of Aurora by providing assistance and prospective businesses by way of community data, land and building availability, development assistance, and financing resources.

## Describe coordination with the Continuum of Care and efforts to address the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans, and unaccompanied youth) and persons at risk of homelessness.

The City is 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 homelessness issues in the City. The City, Elgin, and Kane County currently serve in a co-leadership position for the Kane County Continuum of Care, and utilize this

position to coordinate the efforts of essential County-wide networks and coalitions. The City also partners with the CoC to identify priority needs, strategies, and funding opportunities, putting forth an objective view of performance, and finally, to share the information to help planning efforts of diverse providers within Kane County. This allows the City to coordinate efforts with partner agencies to achieve a collective impact on priority needs throughout 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 is the second largest homeless shelter in the State of Illinois and has established a comprehensive resource center to help transition individuals and families out of homelessness. The City has actively sought to expand this community resource and other homeless services over the last three years through the completion of facilities improvement infrastructure projects funded via the CDBG program and local funds.

A primary goal of Hesed House is to assist individuals and families in becoming self-sufficient, enabling them to transition from temporary to permanent housing. Both organizations have within their goals and outcomes that of working toward permanent housing and self-sufficiency. To meet this goal, each organization provides case management that includes life skills training, advocacy, and referrals to partner agencies. This case management is meant to assist in stabilizing a homeless person's situation so that they can concentrate on addressing the root cause of their homelessness and gaining access to stable housing.

The City and its CoC partners continue to advocate 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 shelter as a strategic response to reducing homelessness.

The City 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.

# 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 Kane County COC consults with the State of Illinois and plans for the efficient use of ESG Funds in the County. ESG funds are allocated according to a ranking system. Evaluation criteria includes but are not limited to; program/agency capacity and duplicity of services. The CoC reports on and evaluates the performance of ESG recipients and sub recipients. The COC's geographic area includes the entire Kane County area.

Annually, the COC establishes priorities for funding projects in Kane County. The selection process is transparent and inclusive and based on the standards indicated in 24 CFR Part 578.19(b). The COC develops and follows a collaborative process for the development of applications in response to a HUD Notice of Funding Availability (NOFA). Priorities for funding are determined based on HUD's priorities found in the NOFA, annual gap analysis, and consistency with the COC's plan to end homelessness.

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

1	Agency/Group/Organization	Aurora Housing Authority
	Agency/Group/Organization Type	РНА
	What section of the Plan was addressed by Consultation?	Public Housing Needs Market Analysis
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Efforts to include all agency types relevant to the Annual Action Plan were contacted for input into the process and development of the 2024 AAP. These efforts included email notices, public notices on the City's website, a newspaper notice, and public hearing. Additionally, the Community Development Division communicates throughout the year with the various agencies, partners, and government bodies to gather information and identify needs.
2	Agency/Group/Organization	Various non-profit and governmental agencies
	Agency/Group/Organization Type	Housing Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Persons with HIV/AIDS Services-Persons with HIV/AIDS Services-Victims of Domestic Violence Services-Victims of Domestic Violence Services-Health Services-Health Services-Education Services-Education Services-Employment Services-Employment Services – Victims Health Agency Child Welfare Agency Other government – State Other government - County Other government – Local Planning organization Business and Civic Leaders

What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Non-Homeless Special Needs HOPWA Strategy Market Analysis Economic Development Lead-based Paint Strategy
Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Anti-poverty Strategy Efforts to include all agency types relevant to the Annual Action Plan were contacted for input into the process and development of the 2024 AAP. These efforts included email notices, public notices on the City's website, a newspaper notice, and public hearing. Additionally, the Community Development Division communicates throughout the year with the various agencies, partners, and government bodies to gather information and identify needs.

Table 3 – Agencies, groups, organizations who participated

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

Not applicable.

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

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Continuum of Care	Kane County	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 agencies that assist individuals and families that are at-risk of being homeless or are in various stages of homelessness. These social service agencies provide: Outreach, Assessment and Intake; Emergency 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 2020-2024 Consolidated Plan goal to mitigate or prevent homelessness.

Table 4 – 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 (amended August 13, 2019 and April 28, 2020).

The following dates reflect the City's public comment periods for its 2024 Annual Action Plan Approval:

The City's Draft 2024 Annual Action Plan was made available for public comment on Monday, December 18, 2023. A public hearing is scheduled for January 5, 2024 at 1:00 p.m. The public comment period is scheduled to conclude on January 16, 2024 at 4:00 p.m. Copies of the City's Draft 2024 Annual Action Plan were made available online at https://www.aurora-il.org/1175/Neighborhood-Redevelopment, at the Community Development Division, and at the City's three library branches.

Efforts to include all agency types relevant to the Annual Action Plan were contacted for input into the process and development of the 2024 AAP. These efforts included an estimated520 email notices to representatives from non-profit agencies, elected officials, advisory boards, interested businesses, and residents of the City, public notices on the City's website, newspaper notice in The Beacon News and a public hearing. Additionally, the CDD communicates throughout the year with the various agencies, partners, and government bodies to gather information and to identify needs. The CDD emailed announcements, posted public notices online and in the newspapers regarding its CDBG application workshop. The CDD also posted public hearing notices online, The Beacon News, and at City Hall regarding its 2023 Annual Action Plan. The City's 2024 Annual Action Plan was also displayed for the public on the City's website, at the City's three library branches, and at the City's Community Development Division office at City Hall.

A summary of citizen participation efforts, including a summary of comments or views submitted and reason comments or views were not accepted to satisfy the City's HUD Funding Program Requirements and a description of the corresponding public notification process will be attached to the Citizen Participation Attachment.

To date, the City has not received any public comments.

#### **Citizen Participation Outreach**

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comment s not accepted and reasons	URL (If applicable)
1	Internet Outreach	Non- targeted/broad community General Public/Non Profit Organizations	8/11/23: Public Announcement posted online	Not Applicable	Not Applicable	
2	Newspaper Ad	Non- targeted/broad community	8/13/23: Public announcement posted in Beacon News	Not Applicable	Not Applicable	
3	Internet Outreach	Non- targeted/broad community	8/25/23: 81 participants, representing approximately 50 different agencies/organization s.	No comments received	Not Applicable	
4	Public Meeting	Non- targeted/broad community	12/13/23: Block Grant Working Committee	TBD		

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comment s not accepted	URL (If applicable)
5	Public Hearing	Non- targeted/broad community	1/5/24	TBD	and reasons	
6	Public Meeting	Non- targeted/broad community	1/9/24:Public Health, Safety and Transportation Committee	TBD		
7	Public Meeting	Non- targeted/broad community	1/16/24: Committee of the Whole Meeting	TBD		
8	Public Meeting	Non- targeted/broad community	1/23/24: City Council	TBD		

Table 5 – Citizen Participation Outreach

#### **Expected Resources**

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

#### Introduction

The Office of Community Planning and Development at the U.S. Department of Housing and Urban Development (HUD) allocates CDBG, HOME, and ESG to Aurora's Community Development Department.

The Anticipated Resources Matrix below outlines each of these funds, expected amounts available in Year 5and a projection of resources between fiscal year 2020 and fiscal year 2024, and a pre-populated list of available uses of funds from the HUD's planning system (Integrated Disbursement and Information System). The amounts include funds that can be used towards administrative caps. For example, the CDBG program allows up to 20% and the HOME program allows up to 10% of its programs funds to be spent towards planning and administrative expenses. As a result, the full five-year entitlement may not be fully allocated in the Goals section of SP-45.

Program income dollars are collected annually by the Community Development Division, for both the CDBG and HOME programs. Program income is derived primarily from repayment of loans provided to citizens to assist in the purchase of homes or from developers provided to assist in the development of affordable housing and non-housing community development projects within Aurora.

Contingency Statement: The City is making assumptions on its receipt of level funding as per its 2023 funding allocations and has the following contingency plan in place for when actual amounts are announced. If the total HUD grant received by the City of Aurora is lower or higher than the funds allocated to projects/activities in AP-20 and AP-35, then each project/activity's budget may be reduced or increased in the same proportion as the percentage difference between the estimated total grant and the actual total grant. For example, a CDBG funding decrease will result in a drop in administration and public service funding to their maximum regulatory threshold percentages (20% and 15%, respectively). Public service activities will be reduced upon an applicant and/or subrecipient's demonstrated financial need. If the 2024 CDBG funding is increased, the City's administration will be increased to its respective percentage cap. In the event that there is a funding increase, the City reserves the right to allocate funds to City administered projects (such as, but not limited to: public works projects, neighborhood revitalization projects, housing activities, etc.) and/or additional funds to existing and/or new projects depending upon an applicant and/or subrecipient's demonstrated financial need. Additional funding will then be reviewed by staff and may require further approval by the Block Grant Working Committee and City Council.

Additionally, with regard to CDBG funds, should City staff and the CDBG subrecipient determine that a

2024 project is no longer in need of its allocated funds, the funds will be recaptured and reprogrammed to the City's 2024 Community Facilities/Infrastructure/Amenities: Contingency Funds.

Special Note: Per 24 CFR 570.200(h), "Reimbursement for Pre-award Costs", under certain conditions, the City and its subrecipients may incur costs prior to the effective date of the City's grant agreement with HUD. Pre-award costs may not exceed 25% of grant amount or \$300,000, whichever is greater. To provide the required public disclosure of the City's intent to use unobligated carry forward funds as necessary for such 2024 pre-award costs, the regulatory provisions for incurring pre-award costs under 24 CFR 570.200(h)(1) will be discussed at the public hearing. This may include using unobligated front funding for public service, program administration, neighborhood revitalization/infrastructure, and housing activities.

#### **Anticipated Resources**

Program S	Source	Uses of Funds	Expected Am	ount Availa		Expected	Narrative	
	of Funds		Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$	Amount Available Remainder of ConPlan \$	Description
-	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	1,304,706	0	0	1,304,706	1,304,706	Total amounts to \$1,304,706 which is the projected total for the remaining year of the City's entitlement allocation (based upon 2023 allocation). Amount is subject to change depending upon unexpended prior year funds and program income.

Program	Source of Funds	Uses of Funds	Expected Am	Expected	Narrative			
				Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$	Amount Available Remainder of ConPlan \$
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	701,962	0	0	701,962	701,962	Total amounts to \$701,962 which is the projected total for the remaining year of the City's entitlement allocation (assuming level funding as per 2023 allocation) and prior year resources. Amount is subject to change depending upon unexpended prior year funds and program income.

Table 6 - Expected Resources – Priority Table

## Explain how federal funds will leverage those additional resources (private, state and local funds), including a description of how matching requirements will be satisfied

The HOME program requires participating jurisdictions to provide match in an amount equal to no less than 25% of the total HOME funds drawn for the project cost. 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 encourages applicants to submit proposals that leverage eligible HOME match dollars. Since 2010, the City has partnered with developers and non-profit agencies to produce an approximate match surplus of \$1.6 million dollars. This surplus will ensure the City will meet the required match obligations for the next several years without the need for any additional match contributions. Additionally, CDBG projects are often only a portion of the total budget, producing additional match for activities identified as public service and capital improvements.

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

The City's Financial Empowerment Center is located at 712 S. River Street, a vacant, city-owned building that was once an administrative office for the Fox Valley Park District. During this consolidated planning period, this property has been transformed into a collaborative center for nonprofit organizations and social entrepreneurs to share the space and resources. The City's Financial Empowerment Center is also housed at this location.

#### Discussion

The City may not submit its 2024 AAP for HUD approval until it receives its funding allocation notice.

#### Annual Goals and Objectives

#### AP-20 Annual Goals and Objectives

#### **Goals Summary Information**

oals Summary Information								
Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Expand the Affordable	2020	2024	Affordable	Neighborhood	Affordable Housing	HOME:	Other: 0 Other
	Housing Stock			Housing	Revitalization	Homeless Prevention	\$631,766	
				Public	Strategy Area	Capacity-Building		
				Housing	City of Aurora			
				Homeless				
				Non-				
				Homeless				
				Special Needs				
2	Ensure Housing Stock is	2020	2024	Affordable	City of Aurora	Affordable Housing	CDBG:	Homeowner Housing
	Safe/Healthy/Accessible			Housing			\$300,000	Rehabilitated: 43
				Non-				Household Housing
				Homeless				Unit
				Special Needs				
3	Strengthen	2020	2024	Affordable			CDBG:	Direct Financial
	Homeownership Among			Housing			\$50,000	Assistance to
	LMI Households							Homebuyers: 12
								Households Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
4	Public Service Assistance	2020	2024	Affordable	Neighborhood	Homeless Prevention	CDBG:	Public service
				Housing	Revitalization	Capacity-Building	\$200,000	activities other than
				Homeless	Strategy Area			Low/Moderate
				Non-Housing	City of Aurora			Income Housing
				Community				Benefit: 7,121 Persons
				Development				Assisted
5	Enhance and Improve	2020	2024	Non-Housing	City of Aurora	Affordable Housing	CDBG:	Public Facility or
	Access to Amenities			Community		Homeless Prevention	\$376 <i>,</i> 765	Infrastructure
				Development		Neighborhood		Activities other than
						Investments that affirm		Low/Moderate
						fair housing		Income Housing
						Capacity-Building		Benefit: 92 Persons
						Sustainability/Community		Assisted
						Resiliency		
6	Program Administration	2020	2024		Neighborhood	Affordable Housing	CDBG:	Other: 0 Other
	(CDBG and HOME)				Revitalization	Homeless Prevention	\$260,941	
					Strategy Area	Neighborhood	HOME:	
					City of Aurora	Investments that affirm	\$70,196	
						fair housing		
						Capacity-Building		
						Sustainability/Community		
						Resiliency		
7	Foster Small and Local	2020	2024	Non-Housing	City of Aurora	Neighborhood	CDBG:	Other: 0 Other
	Business Development			Community		Investments that affirm	\$117,000	
				Development		fair housing		
				Table 7 –	Goals Summary	·		•

#### **Goal Descriptions**

1	Goal Name	Expand the Affordable Housing Stock
	Goal Description	Expanding the existing affordable housing stock with newly produced units will better meet the current unmet need for affordable housing. Throughout this Consolidated Planning period, housing restricted to households below 80% AMI will be considered; however, RFPs will prioritize projects that increase the stock of permanent supportive housing, family-sized units, housing restricted to households who earn less than 50% of the area median income, and special needs groups, including housing for older adults, physically and developmentally disabled, persons who are mentally ill, persons with substance use disorders, victims of domestic violence, and persons with HIV/AIDS.
		Of the \$701,962, 15% of the total funds (\$105,294) will be set-aside for CHDO activities. (Although the CHDO set-aside will remain at 15%, the actual CHDO amount will be determined upon HUD's notification of the City's 2024 HOME allocation.) Currently, the City does not have an affordable housing development project. As a result, the Affordable Housing
		Development Goal Outcome Indicators are TBD and currently marked as "0" under "Other." The number will be adjusted when the City allocates funding towards an affordable housing development.
2	Goal Name	Ensure Housing Stock is Safe/Healthy/Accessible
	Goal Description	Housing rehab activities will promote long-term, community-based housing options for older adults and persons with physical and developmental disabilities to age in place; promote actions that decrease environmental hazards, such as lead-based paint or lead poisoned drinking water, and other hazards as part of the Healthy Homes Rating System. Funds may also be used to support policies and programs that increase a community's ability to respond to natural disasters and other impacts of climate change, particularly for vulnerable populations.
3	Goal Name	Strengthen Homeownership Among LMI Households
	Goal Description	Direct first-time homebuyer assistance.

oal Name oal escription oal Name oal escription	Public Service Assistance         Activities that promote this goal include tenant-based rental/mortgage assistance for the prevention of homelessness, rapid-rehousing, the development of new permanent supportive housing units, community-based shelter facilities, and needed public services that increase economic opportunities, reduce poverty, or support special needs populations.         Enhance and Improve Access to Amenities         Targeted neighborhood investments that provide safe and accessible pedestrian modes of transportation from affordable housing communities to neighborhood amenities and public transit, promote crime prevention through environmental design standards, and adds neighborhood amenities (i.e. public art, community gardens, playgrounds, and parks) that					
escription oal Name oal	rapid-rehousing, the development of new permanent supportive housing units, community-based shelter facilities, and needed public services that increase economic opportunities, reduce poverty, or support special needs populations. Enhance and Improve Access to Amenities Targeted neighborhood investments that provide safe and accessible pedestrian modes of transportation from affordable housing communities to neighborhood amenities and public transit, promote crime prevention through environmental design standards, and adds neighborhood amenities (i.e. public art, community gardens, playgrounds, and parks) that					
oal	Targeted neighborhood investments that provide safe and accessible pedestrian modes of transportation from affordable housing communities to neighborhood amenities and public transit, promote crime prevention through environmental design standards, and adds neighborhood amenities (i.e. public art, community gardens, playgrounds, and parks) that					
	housing communities to neighborhood amenities and public transit, promote crime prevention through environmental design standards, and adds neighborhood amenities (i.e. public art, community gardens, playgrounds, and parks) that					
	enhance the quality of life.					
oal Name	Program Administration (CDBG and HOME)					
oal escription	Staff Salaries, program management-related expenses related to the City's CDBG and HOME Programs.					
oal Name	Foster Small and Local Business Development					
oal escription	Section 108 Debt Service Reserve to cover interest and repayment on Aurora Arts Centre Section 108 Loan.					
	The Community Indicator is marked as "0" under "Other" due to the administrative (non-service oriented) nature of the activity.					
	al scription al Name al					

#### Projects

#### AP-35 Projects – 91.220(d) Introduction

Through the City of Aurora's Request for Proposal process, the Community Development Division gives preference for affordable housing projects that integrate neighborhoods racially, ethnically, and economically. In addition, the City targets neighborhood investments that affirmatively further fair housing choice by increasing the number of non-housing investments that increase the desirability of distressed neighborhoods through increasing community amenities, public investments, and economic opportunities. To balance any unintentional housing cost increases as a result of infrastructure or community amenity investments, Aurora is committed to promoting housing affordability and preservation efforts to keep residents in their homes as property values rents rise around them.

#### Projects

#	Project Name			
1	Housing: HOME-Assisted Affordable Housing Projects			
2	Housing: Community Housing Development Organization Reserve (CHDO)			
3	Housing: The Neighbor Project			
4	Housing: Rebuilding Together Aurora			
5	Housing: Choose Aurora			
6	Public Service: CASA Kane County			
7	Public Services: COA Innovation & Strategy Division			
8	Public Services: Hesed House			
9	Public Services: Mutual Ground			
10	Public Service: Quad County Urban League			
11	Public Service: Senior Services Associates			
12	Community Facilities: Jennings Terrace			
13	Community Facilities/Infrastructure/Amenities: Contingency Funds			
14	Program Administration: City of Aurora (HOME)			
15	Program Administration: City of Aurora (CDBG)			
16	Section 108 Debt Service Reserve: Aurora Arts Centre			

#### **Table 8 - Project Information**

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

In its 2020-2024 Consolidated Plan, the City has identified eight goals to address housing and community development needs during its five-year performance period. On an annual basis, the City will try to achieve as many of these goals as feasible. For 2024, the City has selected projects that meet six of its

Consolidated Plan's goals and also for financial reporting consistency, added administration as an additional funding goal.

Priority is assigned based on: the level of need that is demonstrated by the data collected during the preparation of the Consolidated Plan, specifically in the Needs Assessment and Market Analysis; the information gathered during the consultation and citizen participation process; and the availability of resources to address these needs.

Project selection and funding award considers the applicants' proposal and demonstrated financial need, the sub-recipient's experience and capacity, performance goals, and ability to leverage other funds. One of the primary obstacles to meeting underserved needs of residents and organizations is the availability of funding and the declining funding to address the many housing and community development needs.

AP-38 Project Summary

**Project Summary Information** 

#	Project	Goals Supported	Geographic Areas	Needs Addressed	Funding		
	Housing: HOME-Assisted Affordable Housing Projects	Expand the Affordable Housing Stock	City of Aurora - Other	Affordable Housing	HOME : \$526,471		
	Description	Funding will be made available for new affordable housing units, tenant-based rental assistance, and additional resources for homebuyers.					
	Target Date for Completion	12/31/2024					
1	Estimate the number and type of families that will benefit from the proposed activities	Low and moderate income households - TBD					
	Location Description	TBD					
	Planned Activities	TBD					
	Housing: Community Housing Development Organization Reserve (CHDO)	Expand the Affordable Housing Stock	City of Aurora - Other	Affordable Housing	HOME : \$105,295		
	Description	At least 15% of the annual HOME allocation must be spent towards certified CHDOs.					
2	Target Date for Completion	12/31/2024					
	Estimate the number and type of families that will benefit from the proposed activities	Low and moderate income households - TBD					

	Location Description	TBD						
	Planned Activities	TBD						
	Housing: The Neighbor Project	Expand the Affordable Housing Stock	City of Aurora - Other	Affordable Housing	CDBG : \$200,000			
	Description	Safety First						
	Target Date for Completion	12/31/2025	12/31/2025					
3	Estimate the number and type of families that will benefit from the proposed activities	25 low and moderate income households						
	Location Description	Citywide						
	Planned Activities	Provide funding assistance for urgent or safety-related repairs in the homes of income-eligible homeowners including: HVAC/mechanical, electrical and plumbing systems; roof repairs/replacements; porch repairs; mold/radon mitigation; and more.						
	Housing: Rebuilding Together Aurora	Expand the Affordable Housing Stock	City of Aurora - Other	Affordable Housing	CDBG : \$100,000			
	Description	Safe at Home						
4	Target Date for Completion	12/31/2025						
	Estimate the number and type of families that will benefit from the proposed activities	18 low and moderate income households.						

	Location Description	Citywide				
	Planned Activities	To provide ADA compliant accessibility modifications to qualified low-income, owner-occupied, households in which at least one person has an independently verified disability that can be aided through home modification.				
	Housing: Choose Aurora	Strengthen Homeownership Among LMI Households	Neighborhood Revitalization Strategy Area - Strategy area City of Aurora - Other	Affordable Housing	CDBG : \$50,000	
	Description	First-time Homebuyer Assista	nce			
5	Target Date for Completion	12/31/2024				
	Estimate the number and type of families that will benefit from the proposed activities	Approximately 12 low and moderate income households.				
	Location Description	Citywide				
	Planned Activities	Program currently offers up to \$3,000 or \$5,000 forgivable loans to households who earn below 80% AMI, with \$3,000+ loans awarded to homebuyers who purchase in the NRSA. The resources help homebuyers with down payment and closing cost assistance to help increase access to homeownership to low- and moderate-income households. The City will continue to implement this program during this FY2024, and will monitor and augment this program as needed.				
	Public Service: CASA Kane County	Public Service Assistance	City of Aurora - Other	Homeless Prevention	CDBG : \$35,000	
6	Description	Child Advocacy for Abused & Neglected Children in Aurora				
	Target Date for Completion	12/31/2024				

	Estimate the number and type of families that will benefit from the proposed activities	186 low and moderate income children					
	Location Description	100 S. Third St., Suite 460 Geneva IL 60134					
	Planned Activities	Funding for CASA will be in the supervision of children in the program from Aurora and to ensure the proper systems and people are in place to help the children in care heal and thrive.					
	Public Services: COA Innovation & Strategy Division	Public Service Assistance	City of Aurora - Other	Affordable Housing Homeless Prevention	CDBG : \$35,000		
	Description	Aurora Financial Empowerment Center					
	Target Date for Completion	12/31/2024					
7	Estimate the number and type of families that will benefit from the proposed activities	210 low and moderate income individuals					
	Location Description	712 S. River St., Aurora, IL 60506					
	Planned Activities	The Aurora Financial Empowerment Center provides families free financial counseling services to become more financially stable, access to public support programs, workforce development opportunities and child savings toward post-secondary education.					
	Public Services: Hesed House	Public Service Assistance	City of Aurora - Other	Homeless Prevention	CDBG : \$40,000		
8	Description	SEEDS Case Management: SEEDS case manager work with homeless clients of Hesed House, addressing the issues that made them homeless in order to return them to independent living.					
	Target Date for Completion	12/31/2024					

	Estimate the number and type of families that will benefit from the proposed activities	600 low and moderate income individuals					
	Location Description	659 S. River St., Aurora, IL 60506					
	Planned Activities	Funds will be used for SEEDS Case Management staff salaries.					
	Public Services: Mutual Ground	Public Service Assistance	City of Aurora - Other	Homeless Prevention	CDBG : \$40,000		
	Description	MGI's 24-hour Emergency Domestic Violence shelter program exists to be a beacon of hope for those seeking a path away from violence, and continually works to meet the needs of adults and children at risk.					
	Target Date for Completion	12/31/2024					
9	Estimate the number and type of families that will benefit from the proposed activities	325 low and moderate income individuals					
	Location Description	City of Aurora					
	Planned Activities	Funds will be used for domestic violence case manager salaries.					
	Public Service: Quad County Urban League	Public Service Assistance	City of Aurora - Other	Homeless Prevention	CDBG : \$10,000		
10	Description	Community Empowerment Program (Adults)					
	Target Date for Completion	12/31/2024					

	Estimate the number and type of families that will benefit from the proposed activities	50 low and moderate income clients (adults)					
	Location Description	1685 N. Farnsworth Avenue Aurora IL 60505					
	Planned Activities	The Community Empowerment Program will accomplish workforce development outcomes by providing occupational/job and customized training that increases access to skilled workers to meet the workforce needs of local businesses who are industry partners.					
	Public Service: Senior Services Associates	Public Service Assistance	Neighborhood Revitalization Strategy Area - Strategy area City of Aurora - Other	Homeless Prevention	CDBG : \$40,000		
	Description	Connection Center for Senior Assistance					
	Target Date for Completion	12/31/2024					
11	Estimate the number and type of families that will benefit from the proposed activities	5,750 low and moderate income senior citizen individuals					
	Location Description	2111 Plum St, Aurora, IL 60506					
	Planned Activities	Provision of services for seniors, veterans of all ages and persons with disabilities that will allow them to live safely with improved, maintained health, security and dignity in their homes and communities as long as possible.					
12	Community Facilities: Jennings Terrace	Enhance and Improve Access to Amenities	Neighborhood Revitalization Strategy Area - Strategy area City of Aurora - Other	Sustainability/Community Resiliency	CDBG : \$312,000		
	Description	Electrical Service Upgrade					

	Target Date for Completion	12/31/2024					
fami	Estimate the number and type of families that will benefit from the proposed activities	92 low and moderate income	92 low and moderate income individuals				
	Location Description	275 S Lasalle St, Aurora, IL 60505					
	Planned Activities	This project will upgrade electrical service to increase capacity and modernize the existing1960-installed equipment in order to provide enough amperage to power current cooling, heating, IT, and other equipment needs and eliminate power losses.					
	Community Facilities/Infrastructure/Amenities: Contingency Funds	Enhance and Improve Access to Amenities	Neighborhood Revitalization Strategy Area - Strategy area City of Aurora - Other	Sustainability/Community Resiliency	CDBG : \$64,765		
	Description	Set-Aside Public Facility Improvement/Infrastructure/Neighborhood Investment Funds					
	Target Date for Completion	12/31/2024					
.3	Estimate the number and type of families that will benefit from the proposed activities	The community Goal Outcome Indicator is TBD and currently marked as "0" under "Other." The number will be adjusted when the City allocates funding towards a community amenities project.					
	Location Description	TBD					
	Planned Activities	Funds are reserved for future community amenities' activities (existing or new projects). Activities will be approved via the City's minor or substantial amendment process.					
.4	Program Administration: City of Aurora (HOME)	Program Administration (CDBG and HOME)		Affordable Housing	HOME : \$70,196		
		Up to 10% of HOME funds may be spent on planning and administrative activities.					

	Target Date for Completion	12/31/2024				
	Estimate the number and type of families that will benefit from the proposed activities	Not Applicable				
	Location Description	44 E. Downer Place, Aurora, IL 60507				
Planned Activities HOME staff Salaries, program management-related expenses						
15	Program Administration: City of Aurora (CDBG)	Program Administration (CDBG and HOME)	Neighborhood Revitalization Strategy Area - Strategy area City of Aurora - Other	Affordable Housing Homeless Prevention Neighborhood Investments that affirm fair housing Capacity-Building Sustainability/Community Resiliency	CDBG : \$260,941	
	Description	Up to 20% of CDBG funds may be spent on planning and administrative activities.				
	Target Date for Completion	12/31/2024				
	Estimate the number and type of families that will benefit from the proposed activities	Not applicable				
	Location Description	44 E. Downer Place, Aurora, IL 60507				
	Planned Activities	CDBG staff Salaries, program management-related expenses				

	Section 108 Debt Service Reserve: Aurora Arts Centre	Foster Small and Local Business Development	Neighborhood Revitalization Strategy Area - Strategy area City of Aurora - Other	Sustainability/Community Resiliency	CDBG : \$117,000
	Description	Additional security for repayment of Aurora Arts Centre Section 108 Loan.			
	Target Date for Completion	12/31/2024			
16	Estimate the number and type of families that will benefit from the proposed activities	Not applicable. As such, the goal outcome indicator is "0" under "Other".			
	Location Description	Not applicable			
	Planned Activities	Additional security for repayment of Aurora Arts Centre Section 108 Loan (and interest).			

# 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

Activities funded under the Community Development Block Grant Program are restricted to census tracts where more than 51% of the residents earn less than 80% of the area median income. HOME funds may be spent across the city.

The City intends on using the NRSA designation as a tool to leverage HUD's flexible regulations, financial resources from Invest Aurora and other partners, and a concentration of nonprofit offices located in the boundary to address housing, economic empowerment, and neighborhood revitalization issues. The City may provide increased funding limits for projects or programs within the NRSA in order to incentivize revitalization work in this area.

## **Geographic Distribution**

Target Area	Percentage of Funds
Neighborhood Revitalization Strategy Area	10
City of Aurora	90

Table 9 - Geographic Distribution

## Rationale for the priorities for allocating investments geographically

Given the concentration of households experiencing housing issues as well as the additional incentives offered in the Neighborhood Revitalization Strategy Area, preference and incentives will be given to projects and programs within the NRSA.

## Discussion

Through the City of Aurora's Request for Proposal process, the Community Development Division will give preference for affordable housing projects that integrate neighborhoods racially, ethnically, and economically. In addition, the City will target neighborhood investments that affirmatively further fair housing choice by increasing the number of non-housing investments that bolster the desirability of distressed neighborhoods with additional community amenities, public investments, and economic opportunities. To balance any unintentional housing cost increases as a result of infrastructure or community amenity investments, Aurora is committed to promoting housing affordability and preservation efforts to keep residents in their homes as nearby property values and/or rents rise in their neighborhoods. The CDBG housing rehabilitation activity partners focus their activities on the NRSA, and the City's first-time homeowner program offers an additional incentive for prospective NRSA homebuyers.

# Affordable Housing

## AP-55 Affordable Housing – 91.220(g)

## Introduction

This section specifies the goals for the number of homeless, non-homeless, and special needs populations estimated to be provided affordable housing and the number of affordable housing units supported by program type in the FY2024 program year.

One Year Goals for the Number of Households to be Supported	
Homeless	0
Non-Homeless	55
Special-Needs	0
Total	55

Table 10 - 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	0
Rehab of Existing Units	43
Acquisition of Existing Units	12
Total	55

 Table 11 - One Year Goals for Affordable Housing by Support Type

## Discussion

Affordable housing is one of the key priority needs identified as a result of community consultations and discussions and represents one of the most significant challenges facing lower-income households in the City of Aurora. Four out of the nine goals in the Annual Action Plan explicitly call for actions that address housing affordability issues. They include: 1) Expand the affordable housing stock, 2) Strengthen homeownership among low- and moderate-income households, and 3) Ensure the housing stock is safe, healthy, and accessible for all residents.

# AP-60 Public Housing – 91.220(h)

## Introduction

The Aurora Housing Authority (AHA) provides housing assistance through its federal Public Housing and Housing Choice Voucher programs to nearly 2,000 households. AHA's public housing portfolio consists of 502 units at five developments, serving families, seniors and non-elderly disabled individuals. In addition, the agency administers 1,428 federally funded vouchers through its Housing Choice Voucher program.

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

• Continue to streamline work order requests so that issues are corrected more quickly than they have been in the past;

- Re-evaluate preference criteria for Housing Choice Vouchers, and open the waitlist;
- Continue to modernize the existing portfolio;
- Seek out new opportunities for public housing units.

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

The agency holds public hearings, community meetings, and public comment periods to discuss resident concerns and solicit input/feedback on current and proposed policies, programs and activities as part of the Annual Plan and Capital Fund Program. AHA continues to host monthly meetings at each site to give the residents a forum to express their concerns about their living environment, which is fostering relationships between AHA staff and the residents and will lead to more streamlined approaches to addressing issues and improving the living environment in public housing.

The AHA allocates resources to a tenant services budget, which will be used to foster partnerships with other social service agencies that may be able to provide efficient youth and adult resident programming for residents.

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

Not applicable.

## Discussion

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

#### Introduction

Aurora will continue to address its homelessness prevention goals and actions by continuing its participation 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.

Under a competitive request for proposal process, the Community Development Division intends to provide targeted public services that promote the Consolidated Planning Goal to Prevent and End homelessness. The following programs include youth education, case management and a workforce development initiative that promotes self-sufficiency:

- CASA Kane County Child Advocacy for Abused & Neglected Children in Aurora
- City of Aurora: Financial Empowerment Center
- Hesed House: SEEDS Case Management
- Mutual Ground: Domestic Violence Shelter
- Quad County Urban League: Community Empowerment Program Adults
- Senior Services Associates: Community Connection Center

## Describe the jurisdictions one-year goals and actions for reducing and ending homelessness including reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs

The City will continue to 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.

• Work with homeless service providers and funders to ensure that local outreach efforts are culturally competent and designed to meet the needs of people with addictions and mental illnesses.

 Grow the Continuum of Care's Coordinated Entry process with a goal to develop interagency collaboration, partnerships and coordination of services.

 Work with homeless services providers to review restrictive program rules and make adjustments as appropriate to reduce barriers that keep people from obtaining and retaining permanent housing.

- The City will continue its Frequent Users of Systems Engagement (FUSE) partnership with other area rapid re-housing, health, and mental health and service agencies.
- Work with local municipalities as appropriate to advocate for solutions to critical issues, such as affordable housing, local wages and public transportation. Hesed House regularly reaches out to unsheltered homeless individuals by:
- Collaborating with the Aurora Police Department to jointly canvas the City at least three times a year **Draft Annual Action Plan**

as part of the Point-in-Time Count.

• If a homeless individual is found, they are invited to utilize the shelter. However, if the person is unwilling to utilize the shelter, Hesed House continues to follow up and meet the individual where they are.

• Whether on the street or in the shelter, Hesed House case managers follows up with the individuals to help foster relationships.

• Hesed House case managers puts the individual on VI-SPDAT, which gets them on a county list for HUD programs and is part of the coordinated entry process.

#### Addressing the emergency shelter and transitional housing needs of homeless persons

The PADS Program is managed by Hesed House and is an overnight shelter for men, women, and children. The facility offers a place to sleep, shower, do laundry, eat a meal, find medical and legal assistance and other life-sustaining services. The shelter operates from 7pm to 7am every night of the year. The men's sleeping area accommodates 88 sleeping mats. After 9:30 pm, additional mats are placed in our double duty dining room. Several other smaller sleeping areas provide mats and volunteer oversight for single women. Over 70 faith-based communities with teams of volunteers provide food and serve meals, oversee the shelter dining room, store, laundry facilities, and four sleeping areas. Volunteers also make sack lunches and breakfasts to serve guests as they depart for work or other destinations in the morning. Shelter residents are also eligible to sign up for case management services, assistance in finding housing, help securing identification/personal documentation, access to employment training, medical and legal assistance, as well as help obtaining veterans' benefits.

Hesed House also manages a daytime drop-in center that provides shelter, food, access to critical ancillary services for self-sufficiency five days a week. This facility serves 500 men, women and children through its daytime services on a weekly basis.

The City of Aurora currently does not have any transitional housing programs.

The City assists service providers with their facility needs by providing letters of support and providing financial resources.

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

<u>Increase the Supply of Affordable Housing</u>: Increasing the supply of supportive and affordable housing is central to Aurora's efforts to prevent and end homelessness. During this consolidated planning period,

Aurora will:

- Align federal and local investment to meet the Permanent Supporting Housing inventory need for individuals and families who were formerly homeless or who have disabling conditions.
- Ensure there is adequate supply of housing affordable at 30% of income for lower-income households to a range of income levels.
- Work with funders to ensure all new and turnover opportunities are filled via the Coordinated Assessment and Housing Program (CAHP) system.
- Develop common protocol to assist with the identification of individuals and families ready to "move on" from Permanent Supportive Housing.
- Increase access to housing opportunities by providing funding assistance to get in the door with help paying for security deposit/first month's rent assistance.

Increase Economic Security of Households: Households are more stable when resources are in place to pay for basic necessities such as food, transportation, and medical care. Helping households increase income is critical for the homeless services system as a whole. In Permanent Supportive Housing, the household pays no more than 30% of their income towards housing costs. To the extent that Aurora can increase income, the homelessness system can serve more households and spread resources more broadly. Economic security is particularly important for households provided with Rapid Re-Housing assistance, a tool that moves persons experiencing homelessness more quickly into safe, stable housing, but is not intended to be a long-term affordable housing solution. In order to increase the success of families and individuals in the program, and to reduce the likelihood of a return to homelessness, Aurora will increase efforts to provide targeted employment assistance to these households both quickly and intentionally.

<u>Increase Homelessness Prevention Efforts</u>: The City of Aurora will support programs to prevent new individuals from becoming homeless, including individuals transitioning out of other systems (i.e. adult and juvenile justice systems, child welfare and foster care systems, behavioral and other health institutions).

<u>Housing stability/Case Management</u> – Time limited case management for helping people in the transition from emergency or transitional housing into permanent supportive housing to create additional stability.

<u>Aurora Information Referral System</u> - The Aurora Information Referral System (AIRS) connects people with the resources and services they need in the Aurora and Fox Valley region.

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.

In addition to the actions listed in the narrative above, the City of Aurora will pursue the following actions to assist individuals exiting institutions:

<u>Home Rehab/Accessible Housing Modifications:</u> The Safety First and the Safe at Home program finances home repairs that address safety issues and remove threats to health and safety and remove accessibility barriers for persons with limited mobility or other physical impairments. The program currently offers grants and loans specifically for roof repairs and handicapped improvements. The Community Development Division will continue to monitor and augment these programs to ensure lowand moderate-income residents can not only access affordable housing, but maintain safe, stable housing.

<u>Frequent Users System Engagement (FUSE)</u>: The City will continue its Frequent Users of Systems Engagement (FUSE) partnership with other area rapid re-housing, health, and mental health and service agencies. Established in 2016, the FUSE's vision was to create a new intervention strategy and system of communication and coordination to immediately impact the most vulnerable residents through supportive housing and to sustain a process that would prevent other high-need individuals from getting trapped in the cycle of emergency services. Through an agreed upon assessment strategy and a housing placement strategy, and the group created an interagency coordination process that had not previously existed. The group conducts monthly phone conferences as well as quarterly in-person meetings to complete planning activities and propose short and long term policy recommendations that will help the City respond to all of its vulnerable residents.

<u>Discharge Coordination Policy</u>: Aurora will continue to work with the Kane County Continuum of Care and State of Illinois Agencies on adequate discharge policies of persons coming from publicly funded institutions and systems of care, including foster care, health care, mental health, and corrections.

## Discussion

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

## Introduction:

The following barriers were identified from stakeholder consultation, staff comments, and a review of the 2012 Analysis of Impediments to Fair Housing Choice.

<u>Community outreach</u>: Increase information accessibility across the community regarding the existing housing and supportive service resources as well as fair housing laws, including who to contact if discrimination exists and legal rights. Also, strengthen the communication framework to reach limited English proficient residents, particularly Spanish-speaking residents.

<u>Fair housing compliance testing</u>: Stakeholders and citizen input from the online survey as well as respondents from the 2012 Analysis of Impediments noted that discriminatory practices continue to exist, particularly from rental property owners/managers and toward low-income, minority renters, formerly homeless, voucher holders, and households with disabilities. By seeking current real time data to gain an accurate picture of local housing industry practices, the City's decision makers can be better informed on any needed actions to prioritize target populations for local and federal resources.

<u>Underwriting guidelines:</u> Older housing stock in need of significant maintenance and rehab, housing for persons with physical and intellectual disabilities, permanent supportive housing for chronically homeless, and larger unit sizes are all project types that are particularly more challenging to produce, given certain attributes that drive costs per unit higher and reduces the project's ability to achieve economies of scale large enough to recoup the fixed costs to develop the project. Targeting a significant portion of the project to extremely low-income households is difficult to achieve without significant subsidies, including a permanent operating subsidy. The City should continue to ensure that its specific underwriting standards continue to be based upon project type and complexity, and could increase the ratio of subsidy per housing unit on targeted projects where the nature of the project tends to have higher per unit costs, on average.

<u>Voucher selection criteria</u>: Selection criteria among Housing Choice Voucher waitlist candidates prioritized households with a working member, which made access to housing challenging among the unemployed for households out of the labor force (i.e. retired, severely disabled).

<u>Development capacity</u>: Currently, there are few affordable housing developers working in the City; however, the City continues to prioritize capacity-building programming, such as technical assistance trainings for affordable housing developers, to increase the nonprofit capacity and better understand how to promote additional affordable housing development.

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

<u>Funding for affordable housing development</u>: Increasing the supply of quality affordable housing by targeting a portion of HOME and CDBG resources towards new construction or rehabilitation of affordable housing through a request for proposal process. CDD will work with the development community to continue to reduce barriers for development, including the way proposals are received and evaluated.

Leverage greater public and private resources: Federal resources received under this annual action plan are not enough to substantially increase the affordable housing stock. Given the layers of financing often needed to make housing affordable to special needs populations and lower-income households, the City will proactively leverage other local, state, and federal resources (and assist community organizations doing so). In addition, the City will work with private lenders to develop innovative funding mechanisms to support housing and community development goals. This will ensure developers and organizations interested in building housing in Aurora have adequate resources to increase the supply of affordable housing.

<u>Homebuyer Programs</u>: Choose Aurora offers up to \$5,000 forgivable loan to first time homebuyers in City limits. Resources help homeowners who earn below 80% AMI with down payment and closing cost assistance to help increase access to homeownership to low- and moderate-income households. The City will continue to implement this program over this consolidated planning period, and will monitor and augment this program as needed.

<u>Home Rehabilitation Programs</u>: The Safety First and the Safe at Home program finances home repairs that address safety issues and remove threats to health and safety and remove accessibility barriers for persons with limited mobility or other physical impairments. The program currently offers forgivable and deferred loans specifically for construction activities related to safety (code compliance), emergency repairs (e.g. Structural, electrical, mechanical, plumbing, fire prevention and other housing code items), and accessibility modifications (e.g. egress ramps, grab bars, mobility modifications to kitchen and baths) for senior citizens ages 62 and above as well as persons with disabilities... The Community Development Division will continue to monitor and augment these programs to ensure lowand moderate-income residents can not only access affordable housing, but maintain safe, stable housing.

<u>Re-evaluate preference criteria for Housing Choice Vouchers</u>: The Aurora Housing Authority will be reevaluating its preference criteria during this consolidated planning period prior to opening the waitlist for Housing Choice Vouchers.

#### **Discussion:**

# 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 streamline funding processes, and to enhance coordination between public and private housing and social service agencies.

## Actions planned to address obstacles to meeting underserved needs

Over the course of the consolidated planning period, the Community Development Division will continually assess and make adjustments to its policies in response to changing market conditions and service needs, and will ensure projects that serve households and communities with higher needs for services, funding, and housing are awarded preference points during the funding process.

Federal resources received under this annual action plan are not enough to address the needs of households and persons experiencing homelessness who are currently underserved by the market and available programs. Given the layers of financing often needed to deliver services or make housing affordable to special needs populations and the lowest-income households, the City will provide preference points to projects that leverage other resources, so that federal and local funds may be stretched further and assist as many underserved households as possible.

With the available resources, the City anticipates supporting its underserved population by doing the following:

• Provide housing resources (more fully described below) to underserved households identified in the housing and market analysis.

• Provide funding in support of community facilities, infrastructure, and other amenities that increase the desirability of distressed neighborhoods lacking amenities.

• Offer financial support/programs to small businesses that have difficulty securing conventional financing for space acquisition, development, or renovation.

## Actions planned to foster and maintain affordable housing

1. Provide technical assistance to organizations interested in becoming a certified Community Housing Development Organization.

2. Offer incentives/funding for the following activities:

a. Homebuyers with incomes up to 80% of the area median income purchase homes that they can afford.

b. Homeowners with incomes up to 80% of the area median income to rehabilitate homes in disrepair.
c. Make funds available for developers who want to build or rehabilitate housing for-sale or rental housing that would be set aside to households with incomes below 80% of the area median income.
d. Community-based organizations that provide key housing related services that prevent homelessness and help maintain housing for households in need. These services may include foreclosure or eviction prevention, homebuying counseling, legal services, or supportive services for persons with special needs (e.g. mental illness, developmental disability, physical disability, homeless, substance abuse addiction).

#### Actions planned to reduce lead-based paint hazards

The City as well as its CDBG subrecipients for housing rehabilitation (The Neighbor Project and Rebuilding Together Aurora) and down payment assistance follow HUD's Lead Safety Guidance as per 24 CFR 35 by including the distribution of the pamphlet, "Protect Your Family From Lead in Your Home" in their respective programs. All HOME direct housing assistance activities are required to 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).

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).

In addition, the City of Aurora will actively look for funding opportunities in collaboration with the Kane County Health Department and the City of Elgin to administer programs that address lead-based paint hazards in residential units where children reside who have been diagnosed with elevated lead blood levels.

<u>Safety First Program:</u> In partnership with The Neighbor Project, income-eligible homeowners may receive funding to address safety issues at their homes of income-eligible homeowners in the amount of \$7,500 in the form of a three (3) year forgivable loan, and for certain activities, additional funding of up to \$7,500 in the form of a deferred loan. Environmental remediation, including lead pipe replacement, replacement of service line replacement, remediation of lead-based paints, radon, mold, and asbestos.

## Actions planned to reduce the number of poverty-level families

1. Promote community-based economic development by making microloans available to small businesses and explore funding for small business technical assistance.

2. Support community-based organizations that provide public services that increase economic

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opportunities, reduce poverty, and support the needs of special populations. This includes housing related services, services for special needs populations, and workforce development programming. Goals for service-related activities would be focused on promoting self-sufficiency among poverty-level (or at-risk) individuals and families.

3. Improve, maintain, and increase the number of affordable housing units within the City through actions mentioned above that would foster and maintain affordable housing.

4. Support capacity building for nonprofit organizations that would lead to more efficient delivery of public services to poverty-level individuals and families.

## Actions planned to develop institutional structure

Community-based nonprofit organizations, community development corporations, and other public agencies have significantly contributed to the City of Aurora through neighborhood stability and growth. The City will continue to refine the way in which funds are delivered effectively to the community. This year, the city will:

1. Strategically and proactively seek out partnerships with community-based organizations that can more efficiently deliver programs and services.

2. Re-evaluate existing programs and ensure they are appropriately scaled to meet the community's need. The City has recently modified its Safety First Program allow a forgivable loan up to \$7,500 and a second deferred loan up to \$7,500 for certain activities (i.e. environmental hazards). After a few years of program implementation, few homeowners participated, given the older housing stock in need of rehab assistance. In addition, for homeowners participated found the funding amount was inadequate to address the some rehab needs. The City will continue to re-evaluate and scale its programs after documenting the existing program's impact.

3. Increase staff participation and canvassing of neighborhoods to generate greater interest in programs. The greater presence CDD staff has to share information about programs and learn about community needs, the better prepared CDD will be to inform programs and increase participation to ensure that the City is meeting its spending goals.

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

Throughout the implementation of this Annual Action Plan, the City of Aurora intends to enhance coordination with other critical public and private organizations that will be critical partners to help realize the goals outlined in the Consolidated Plan. These actions include:

1. Continue the Community Development Division's active role in the Continuum of Care for Kane County, which provides housing and other forms of support for the homeless.

2. Continue to work with service and housing providers to address the housing needs of lower-income **Draft Annual Action Plan** 

households and special needs populations.

3. Continue to foster its relationship with the Aurora Housing Authority.

4. Improve relationships with the development community to raise awareness about available funds. Increased education and additional capacity building opportunities may increase the number of organizations who apply for funds to develop or preserve affordable housing.

5. Make connections between service providers and the development community to help streamline housing and services for housing for individuals with special needs.

#### **Discussion:**

# **Program Specific Requirements**

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

## Introduction:

This section describes HUD program requirements for the Community Development Block Grant Program (CDBG) and HOME Investment Partnerships (HOME).program.

## Community Development Block Grant Program (CDBG) Reference 24 CFR 91.220(I)(1)

Projects planned with all CDBG funds expected to be available during the year are identified in the Projects Table. The following identifies program income that is available for use that is included in projects to be carried out.

1. The total amount of program income that will have been received before the start of the next	
program year and that has not yet been reprogrammed	0
2. The amount of proceeds from section 108 loan guarantees that will be used during the year to	
address the priority needs and specific objectives identified in the grantee's strategic plan.	0
3. The amount of surplus funds from urban renewal settlements	0
4. The amount of any grant funds returned to the line of credit for which the planned use has not	
been included in a prior statement or plan	0
5. The amount of income from float-funded activities	0
Total Program Income:	0

## **Other CDBG Requirements**

1. The amount of urgent need activities	0
2. The estimated percentage of CDBG funds that will be used for activities that	
benefit persons of low and moderate income. Overall Benefit - A consecutive	
period of one, two or three years may be used to determine that a minimum	
overall benefit of 70% of CDBG funds is used to benefit persons of low and	
moderate income. Specify the years covered that include this Annual Action Plan.	70.00%

## HOME Investment Partnership Program (HOME) Reference 24 CFR 91.220(I)(2)

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

The City of Aurora establishes the terms of assistance for each project funded through a regulatory agreement subject to the HOME requirements. Investment can take a wide range of forms, depending upon the project or program's specific needs, and include:

<u>Interest or non-interest bearing loans or advances</u>: 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, and some, or even all, principal and interest payments are deferred until some point in the future. Loan terms are structured based on a case by case situation and deferred payment loans use the property or some other form of collateral as security for repayment.

<u>Grants</u>: Provided with no requirement or expectation of repayment. They would require no liens on the property or other assets.

<u>Interest subsidies</u>: An upfront discounted payment to a private lender in exchange for a lower interest rate on a loan.

**Equity Investment**: An investment made in return for a share of ownership. Under this form of subsidy, the City of Aurora 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 Guarantee 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 a 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:

Homebuyers must receive housing counseling before receiving HOME assistance to understand all rules and restrictions associated with the federal financing, the long term commitment of purchasing a home, the implications of accepting a mortgage with loan terms, the recapture or resale option, and to consider the family's ability to sustain mortgage payments for the life of the loan. At the sale of the home, the homebuyer will enter into a regulatory agreement (i.e. deed

restriction) with the City of Aurora, which will outline the compliance period.

Affordable compliance periods for homebuyers who receive HOME funds will depend upon the amount of financing provided, and will generally be subject to a compliance period. If a home purchased with HOME assistance is sold during the period of affordability, resale or recapture provisions apply to ensure the continued provision of affordable housing. At the resale, the affordability terms will be reset at the sale of the home.

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

The City of Aurora, through its HOME RFP process, will make HOME funds available to developers interested in acquiring units for affordable housing. Property owners interested in acquiring units with HOME funds will be required to set aside a portion of their project as affordable under HOME guidelines. Projects approved will be required to enter into a regulatory agreement with the City of Aurora and will be subject to a compliance period on the units set aside as affordable under HOME regulations.

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:

The City of Aurora, through its HOME RFP process, will make funds available to multifamily property owners interested in refinancing existing debt in exchange for setting aside a portion of their project as affordable under HOME guidelines. Projects approved will be required to enter into a regulatory agreement with the City of Aurora and will be subject to a compliance period on the units set aside as affordable under HOME regulations.

In the event that the City would permit refinance activities using HOME Program funds, the City will:

- Demonstrate that rehabilitation is the primary eligible activity and ensure that this requirement is met by establishing a minimum level of rehabilitation per unit or a required ratio between rehabilitation and refinancing.
- Require a review of management practices to demonstrate that disinvestment in the property has not occurred; that long-term needs of the project can be met; and that the feasibility of serving the targeted population over an extended affordability period can be demonstrated.
- State whether the new investment is being made to maintain current affordable units, create additional affordable units, or both.
- Specify the required period of affordability, whether it is a minimum 15 years or longer.
- Specify whether the investment of HOME funds may be jurisdiction-wide or limited to a specific geographic area, such as a neighborhood identified in a neighborhood revitalization strategy under

24 CFR 91.215(g) or a federally designated Empowerment Zone or Enterprise Community.

- State that HOME funds cannot be used to refinance multifamily loans made or insured by any federal program, including the CDBG program.
- 5. If applicable to a planned HOME TBRA activity, a description of the preference for persons with special needs or disabilities. (See 24 CFR 92.209(c)(2)(i) and CFR 91.220(I)(2)(vii)).
- 6. If applicable to a planned HOME TBRA activity, a description of how the preference for a specific category of individuals with disabilities (e.g. persons with HIV/AIDS or chronic mental illness) will narrow the gap in benefits and the preference is needed to narrow the gap in benefits and services received by such persons. (See 24 CFR 92.209(c)(2)(ii) and 91.220(I)(2)(vii)).
- If applicable, a description of any preference or limitation for rental housing projects. (See 24 CFR 92.253(d)(3) and CFR 91.220(I)(2)(vii)). Note: Preferences cannot be administered in a manner that limits the opportunities of persons on any basis prohibited by the laws listed under 24 CFR 5.105(a).